CLEAN WATER MONTGOMERY
clean water for all
Dept. of Environmental Protection

National Pollutant Discharge Elimination System Municipal Separate Storm Sewer System

Montgomery County, Maryland

FY25 Annual Report

July 1, 2024, to June 30, 2025

MONTGOMERY COUNTY 17 76 MARYLAND

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Acronyms and Abbreviations

Acronym	Definition
Act	Stormwater Management Act of 2007
BMP	best management practice
CA	community/condo association
CBT	Chesapeake Bay Trust
CIP	capital improvement program
County	Montgomery County
CY	calendar year
DEP	Montgomery County Department of Environmental Protection
DFM	Montgomery County Division of Facility Management
DGS	Montgomery County Department of General Services
DHCA	Montgomery County Department of Housing and Community Affairs
DPS	Montgomery County Department of Permitting Services
E. coli	Escherichia coli
ECCD	Energy, Climate, and Compliance Division
EPA	U.S. Environmental Protection Agency
ESC	erosion and sediment control
ESD	environmental site design
FAP	financial assurance plan
FIB	fecal indicator bacteria
FY	fiscal year
GHP	good housekeeping plan
HOA	homeowners association
I&M	inspection and maintenance
IA	impervious area/acreage
ID	identification
IDDE	illicit discharge detection and elimination
ISR	impervious surface restoration
KCI	KCI Technologies, Inc.
LFWA	Little Falls Watershed Alliance
MBSS	Maryland Biological Stream Survey
MCDOT	Montgomery County Department of Transportation
MCPS	Montgomery County Public Schools
MDE	Maryland Department of the Environment
MDOT	Maryland Department of Transportation
MEP	maximum extent practicable
M-NCPPC	Maryland-National Capital Park and Planning Commission
MS4	Municipal Separate Storm Sewer System
MS4 Permit	Municipal Separate Storm Sewer System Permit Number 06-DP-3320 MD0068349
NOI	notice of intent
NOV	notice of violation
NPDES	National Pollutant Discharge Elimination System
OCA	Office of the County Attorney

Acronym	Definition
PCB	polychlorinated biphenyl
Permit	Municipal Separate Storm Sewer System Permit Number 06-DP-3320 MD0068349
ROE	right-of-entry
ROW	right-of-way
RPC	responsible personnel certification
SFR	single-family residence or residential
SHA	State Highway Administration
SMP	Salt Management Plan
SOP	standard operating procedure
SR	stream restoration
SSO	sanitary sewer overflow
SVP	Stream Valley Park
SVU	stream valley unit
SW Industrial GP	General Permit for Discharges of Stormwater Associated with Industrial Activity
SWIM	stormwater inspection and maintenance program
SWM	stormwater management
SWPPP	Stormwater pollution prevention plan
TMDL	total maximum daily load
TPC	Tournament Players Club
WLA	wasteload allocation
WQPC	water quality protection charge
WSSC	Washington Suburban Sanitation Commission
WWTP	wastewater treatment plant

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Executive Summary of Accomplishments

July 1, 2024, to June 30, 2025

Montgomery County (the County) manages multiple programs that assess and address impacts from stormwater and surface water pollution. By implementing a comprehensive stormwater management program, the County staff and partners work to protect and improve water quality in the County's streams and waterways.

A significant component of the County's stormwater program is its Municipal Separate Storm Sewer System (MS4) Permit, a 5-year permit issued by the Maryland Department of the Environment (MDE) on November 5, 2021 (the 2021 MS4 Permit). The Permit term will expire on November 5, 2026. The County submitted its reapplication for coverage under the MS4 Permit in December 2025.

For most urban and suburban areas like Montgomery County, what goes into our storm drains makes its way into our local streams. Those streams are part of larger watersheds that lead to major rivers, like the Potomac River, and eventually the Chesapeake Bay. Because our waters are interconnected and not confined by county or state lines, MDE regulates everything that goes through the storm drain systems by issuing the County an MS4 permit. The reason for the permit is to protect water quality and ensure the County is meeting the requirements of the Clean Water Act.

WHAT'S THE PROBLEM?

As the County has become more developed, its natural landscapes have been replaced with impervious areas such as asphalt, concrete, buildings, and roadways.

Before development, water from rain or snow melt was absorbed naturally into the soil or flowed over the ground to a nearby stream. Development has disrupted this natural water flow cycle.

Currently during rain and snow melt, this stormwater runoff flows across paved surfaces and picks up whatever is in its path – oil, litter, pesticides, fertilizer, leaves, animal waste, and more.

Instead of filtering into the ground, stormwater runoff can also cause flash flooding and significant erosion, as well as damage to properties and infrastructure, as it flows over land or through storm drains to local streams.

WHAT'S THE SOLUTION?

Effective stormwater management:

- Improves the quality of stormwater runoff, by reducing the pollutants it carries to local waterways.
- Reduces the quantity of stormwater, by helping more of it soak into the ground.

PERMIT REPORTING STRUCTURE

Stormwater management involves several methods to address the quality and quantity of stormwater runoff at several points between when the rainfall hits impervious surfaces and becomes stormwater runoff and when the stormwater runoff is discharged into the County's streams:

- Using stormwater BMPs to control and reduce pollution in stormwater runoff before it enters the County's stormwater system.
- Maintaining the County's storm drains, pipes, and other stormwater infrastructure.
- Reducing the amount of polluted stormwater runoff discharging into the County's streams.

Elements of the 2021 MS4 Permit require efforts to improve stormwater management at each of these points. Other permit elements include increasing public education, implementing plans to control the quantity of pollutants that can enter watersheds, and ensuring the County's stormwater programs have adequate funding.

A Best Management Practice (BMP) is a device designed to temporarily store or treat runoff to reduce pollution, and provide other amenities. BMPs include structural practices such as constructed stormwater retention ponds, and nonstructural Environmental Site Design (ESD) practices such as micro-bioretentions.

Montgomery Airpark Stormwater Pond Retrofit, FY25

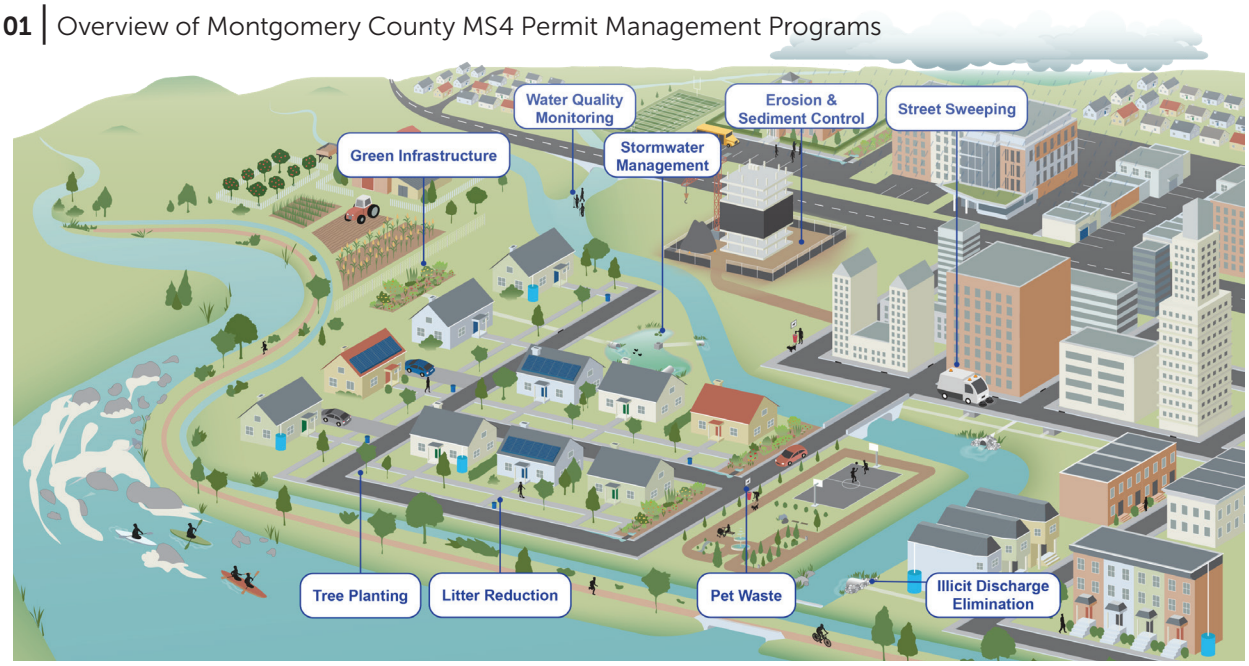
This executive summary of accomplishments follows the structure of the 2021 MS4 Permit, and provides the County's FY25 accomplishments, progress, and compliance with meeting the requirements in the permit.

MANAGEMENT PROGRAMS

To control stormwater quantity and quality, the County implements a diverse set of management programs that target stormwater facility maintenance and inspections, erosion and sediment control (ESC), the detection and elimination of illicit discharges of pollutants, management of pollutants from County property, and public outreach and education. More detail on each of these programs is found in the FY25 MS4 Annual Report and the National Pollutant Discharge Elimination System (NPDES) MS4 Geodatabase.

Figure 1 illustrates the variety of Best Management Practices (BMPs) and programs the County is implementing in support of its MS4 Permit in the county's urban, suburban, and rural areas.

FIGURE 01 | Overview of Montgomery County MS4 Permit Management Programs



Stormwater Management Program Inspection and Maintenance

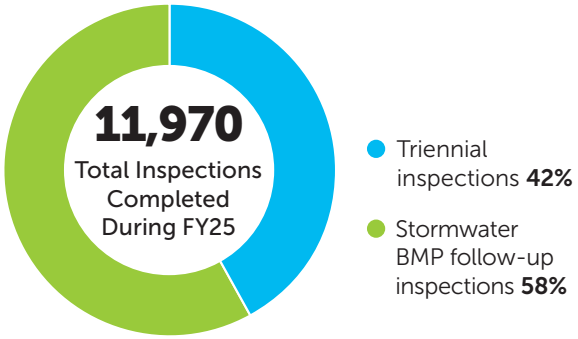
All new development and redevelopment in the County must comply with MDE stormwater design standards. In some cases, the County's requirements are stricter than state standards. Examples include requiring sediment control and stormwater management to be addressed for any new home or commercial building construction, regardless of how much ground is disturbed. The County's Department of Permitting Services (DPS) is responsible for implementing the programmatic requirements for stormwater management plan review and permitting.

During FY25, DPS approved 91 concept designs, 5 site development plans, 476 final plans, 26 redevelopments, and 181 waivers.

The County's Department of Environmental Protection (DEP) is responsible for the triennial inspection and preventative maintenance of stormwater management facilities under the County's jurisdiction. These facilities include BMPs owned by the County, Montgomery County Public Schools, and the Maryland-National Capital Park and Planning Commission, as well as environmental site design (ESD) practices located on County property and rights-of-way. In addition to inspections, the DEP stormwater facility maintenance program oversees structural and nonstructural maintenance of all facilities under the County's jurisdiction.

DEP also conducts maintenance follow-up inspections outside of the triennial inspection program. These inspections verify completed maintenance work, confirm compliance, and investigate public complaints. The stormwater inspection and maintenance group issues notices of violation (NOVs) or citations to property owners responsible for noncompliant structural and nonstructural BMPs. The total number of inspections completed in FY25 is provided in Figure 2.

FIGURE 02 | Total Inspections Completed



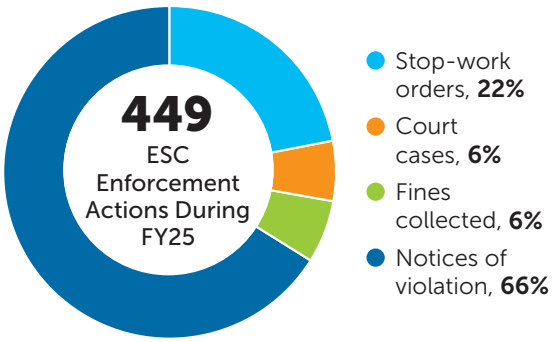
Environmental Site Design (ESD) is a design strategy for maintaining pre-development runoff characteristics and protecting natural resources. ESD BMPs integrate site design, natural hydrology, and smaller controls to capture and treat runoff. These practices include micro-bioretention, rain gardens, permeable pavement, and green roofs.

Micro-bioretention located in a residential community in Clarksburg, Maryland

Erosion and Sediment Control

DPS implements an ESC program designed to reduce pollutants during construction of new development and redevelopment. County staff review permit applications, inspect ESC practices, issue NOVs, and collect fines. Figure 3 provides the number of ESC enforcement actions taken during FY25.

FIGURE 03 | ESC Enforcement Actions During FY25



Illicit Discharge Detection and Elimination

The County implements an inspection and enforcement program to ensure that pollutants are found and prevented from entering the storm drain system and our streams. This program includes the following actions:

- Inspecting storm drain outfalls and looking for pollutants in stormwater (Figure 4).
- Conducting surveys of properties in different commercial and industrial areas of the County (Figure 5).
- Implementing an enforcement program by investigating water quality and illegal dumping complaints and issuing citations, NOVs, and warnings as appropriate.

FIGURE 04 | Summary of FY25 Outfall Inspections

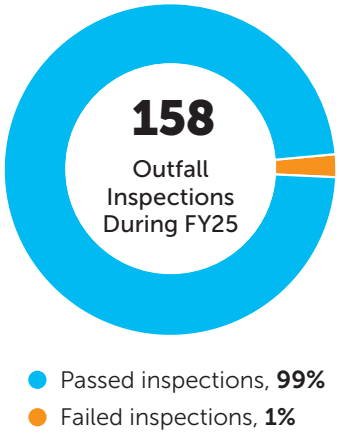
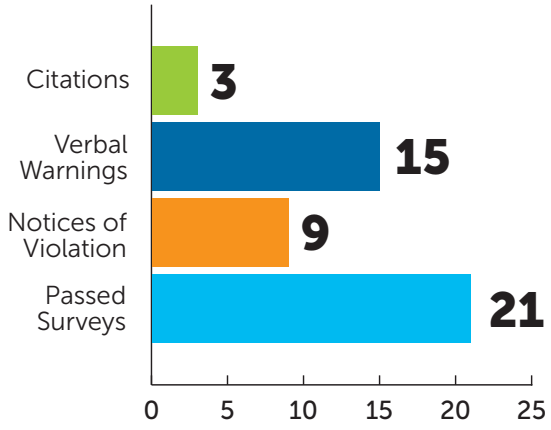


FIGURE 05 | Summary of FY25 Commercial and Industrial Surveys



Storm drain outfall inspected in 2025

Property Management and Maintenance

All County agencies that operate maintenance facilities must comply with the General Permit for Industrial Activities. Eleven County facilities, the Town of Poolesville, and six Montgomery County Public Schools facilities maintain a stormwater pollution prevention plan. County facilities are inspected monthly, and stormwater outfalls on the sites are inspected quarterly. Annual training, including ways to minimize the use of hazardous substances, pollutants, and contaminants and prevent their exposure to precipitation and stormwater runoff, is delivered to all facility operation employees. Additionally, as part of the permit requirement, the County submitted a Good Housekeeping Plan (GHP) to MDE in December 2024 – over 500 county facilities were assessed to determine if a GHP was required based on the activities at the facilities such as car washing. In accordance with the 2021 Permit requirements, the County also submitted a Salt Management Plan to MDE in December 2024, and an updated plan will be submitted to MDE in December 2026. The plan details the County's public road salt application strategies.

In addition, the County administers a street sweeping program that prevents tons of pollutants from entering the County's streams. The County's Department of Transportation removes material from clogged inlets, storm drains, drainage ditches, and adjacent drainage areas. The County also implements direct litter removal and litter reduction programs to reduce material that may enter streams.

Direct litter removal involves removing litter and debris from our streets, sidewalks, and communities before it enters the storm drain or ends up in our streams. Litter reduction programs help reduce the sources of litter. Several programs run by the County provide enforcement and compliance of our laws and outreach and education to prevent and stop littering. During FY25, the County's street sweeping, inlet cleaning and litter removal programs removed 501 tons of debris and litter.

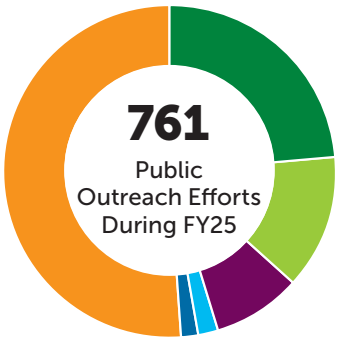
Public Education and Outreach

The County continues to implement a robust public education and outreach program designed not only to meet Permit requirements, but also to increase local awareness of stormwater management benefits and bring associated behavior changes to protect the County's water quality.

The My Green Montgomery (https://mygreenmontgomery.org) online education portal continued as the news and communication arm of the DEP. The public education programming provided social media posts on Facebook, Instagram, X, YouTube, and Nextdoor.

DEP events continued to focus on targeting specific audiences, increasing stormwater and water quality awareness, and encouraging residents to take specific environmentally friendly actions. Figure 6 provides a breakdown of the public education and outreach efforts conducted in FY25.

FIGURE 06 | Public Outreach Efforts during FY25



- Other environmental outreach, **180**
- General water quality/watershed restoration, **101**
- Residential and community SWM implementation and facility maintenance, **65**
- Lawn care and landscape maintenance, **15**
- Litter reduction, **13**
- Reducing, reusing, and recycling, **387**

RainScapes and Tree Montgomery installations with Habitat for Humanity at Allium Place, Wheaton, May 2025

STORMWATER RESTORATION

Watershed restoration work performed in the County is implemented to improve water quality under the guidelines set by MDE in the MS4 Permit. The work is funded primarily through the County's Water Quality Protection Charge. The permit requires the County complete restoration of 1,814 impervious acres by November 4, 2026. The County continues to make progress toward meeting this goal. In FY25, the County has completed 72 percent of the restoration goal. Figure 7 shows the County's current progress, as well as the yearly restoration benchmarks from the Permit.

Glenallen stream restoration completed in FY25

The restoration work the County does to improve water quality includes street sweeping, inlet cleaning, outfall stabilization and stream restoration, planting of street trees and canopy trees through Tree Montgomery, reforestation, installation of small scale BMPs funded by RainScapes and Clean Water Montgomery Grants, and capital program funded ESD and stormwater pond retrofits. Figure 8 shows the percent of impervious acres treated by BMP type, and Figure 9 shows the associated number of projects per BMP type for the County's restoration work completed through FY25.

FIGURE 07 | Annual Restoration Progress

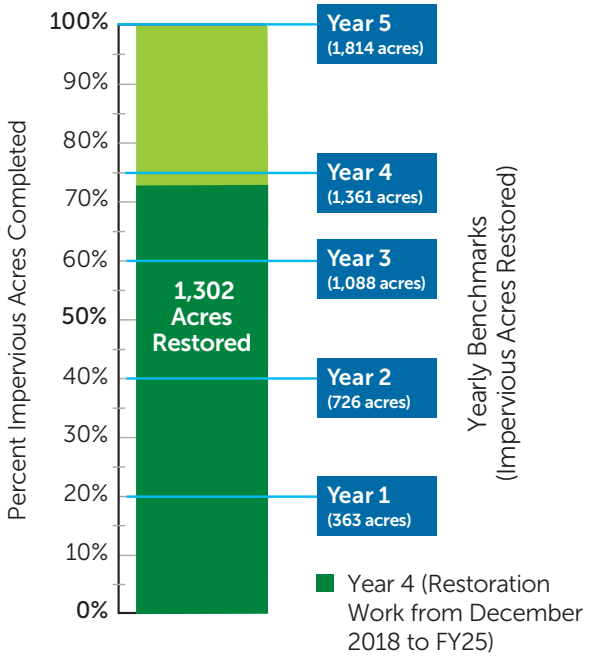


FIGURE 08 | Summary of Stormwater Restoration Projects and Alternate BMPs Implemented during FY25

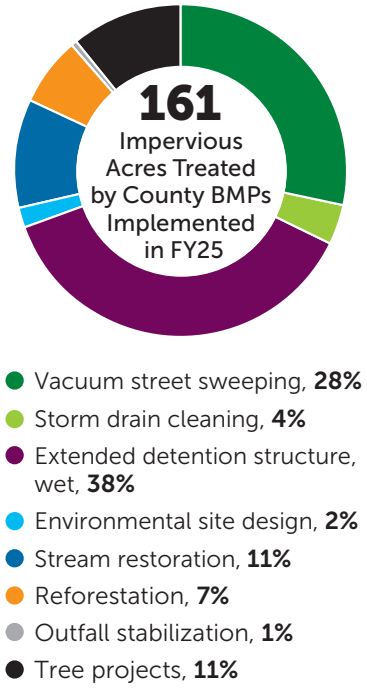
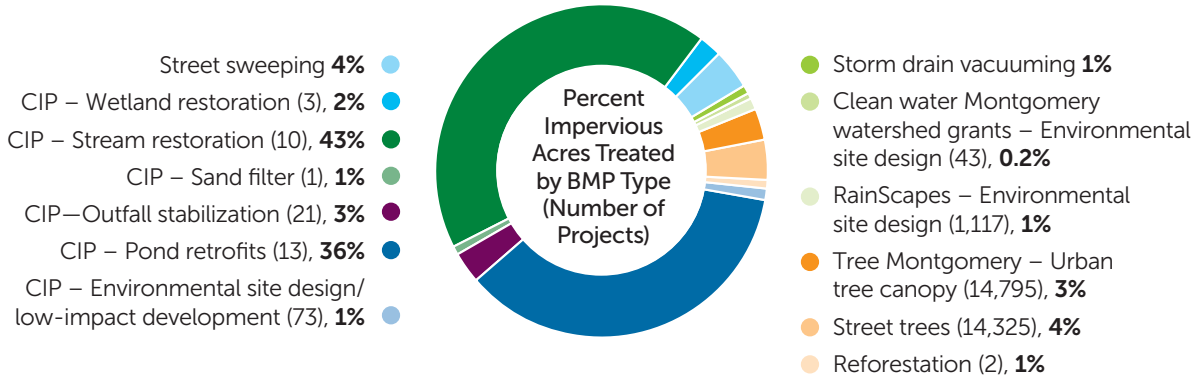


FIGURE 09 | Number of Projects and % Acres by BMP Type in FY25



ASSESSMENT OF CONTROLS

The County is responsible for meeting the 2021 MS4 Permit requirements for both BMP effectiveness and watershed assessment. To support BMP effectiveness monitoring, the County joined the Chesapeake Bay Trust's Pooled Monitoring Program on October 13, 2023. For watershed assessment, the County conducts chloride monitoring at two sites and bacteria monitoring in Total Maximum Daily Load (TMDL) watersheds, and maintains a Countywide benthic macroinvertebrate monitoring program. MDE approved the County's monitoring plan in January 2024. Since then, the County has launched chloride and bacteria monitoring efforts and continued its biological and habitat assessments.

In FY25, County activities included benthic macroinvertebrate and habitat monitoring, maintenance of conductivity loggers, and sample processing in accordance with Maryland Biological Stream Survey protocols. Additionally, bacteria (E. coli) samples were collected starting in September in those watersheds with a bacteria TMDL. Monitoring data from FY22 and FY23, including benthic macroinvertebrates, spring habitat and water quality sampling, and FY25 bacteria (E. coli) were submitted with the FY25 MS4 Annual Report. Results from FY24 chloride and biological monitoring will be included in the next annual report.

Red salamander

Water Quality Protection Charge (WQPC) funds the County's stormwater management programs. The WQPC is assessed based on how much impervious area is on an owner's property, thereby contributing to stormwater runoff. WQPC credits are granted to property owners who install and maintain stormwater facilities on their properties to reduce and/or treat stormwater runoff.

PROGRAM FUNDING

During FY25, reported expenditures associated with all MS4 Permit requirements were $100,871,746, which is an increase of 26 percent over FY24 MS4 Permit expenditures. The increase in expenditures is due to winter weather in FY25 and increased watershed restoration capital expenditures to help the County to meet its Permit goals.

The County has demonstrated its commitment to meet stormwater initiatives by budgeting $81.8 million for FY26. The program funding is supported by revenue generated from the WQPC, BMP monitoring fee, tree canopy fee, stormwater waivers fee, and bag tax.

Highlights of the budget include continuing the planning and implementation of stormwater management projects, public outreach, stream monitoring, and other actions needed to continue to comply with the County's MS4 Permit. Expanding the use of contracts and partnerships through a new Capital Improvement Program continues to help the County meet Permit goals in a more cost-effective manner.

Youth volunteers at the "Gift Outside the Box" campaign event at the Montgomery Mall on December 15, 2024

TOTAL MAXIMUM DAILY LOAD

RainScapes Workshop en Español, Planting at Veteran's Park, Wheaton, June 2025

The County has 23 local total maximum daily loads (TMDLs) for bacteria, nitrogen, phosphorus, sediment, trash, and PCBs. A TMDL is a regulatory term that describes the maximum amount of pollutants that a water body can receive while still meeting water quality standards. The County received approval for all submitted TMDL Implementation Plans with the exception of the Anacostia River, which was under review by MDE in FY25. The updated PCB Implementation Plans were submitted to MDE in August 2024. The Permit also requires the County to develop a Countywide Stormwater TMDL Implementation Plan for each fiscal year. The FY25 plan was provided to MDE in December 2025 and covers the County's progress for FY25.

REAPPLICATION FOR NPDES STORMWATER DISCHARGE PERMIT

The 2021 MS4 Permit required the County to reapply for National Pollutant Discharge Elimination System (NPDES) MS4 permit coverage through its fourth-year annual report. The County submitted its reapplication for coverage under the NPDES MS4 permit in December 2025. As provided in the Code of Maryland Regulations (COMAR) § 26.08.04.06A(3), if a new permit is not issued by MDE after timely reapplication by the permittee, "the terms and conditions of the existing permit shall continue and remain fully effective and enforceable." The permit reapplication is required to ensure the County continues to have coverage under a NPDES MS4 permit and remains in compliance with COMAR and the Clean Water Act.

The County continues to take every reasonable step towards satisfying the 2021 MS4 Permit requirements. Major accomplishments by the County in meeting the permit requirements since 2021, include:

RainScapes Site Assessment Training for Landscape Professionals, January 2025

STORMWATER MANAGEMENT

Approved over **2,500** final plans

Conducted over **45,000** BMP inspections

EROSION AND SEDIMENT CONTROL

Conducted over **84,000** Erosion Sediment Control inspections

IDDE

Conducted over **600** outfall screenings

PROPERTY MANAGEMENT

Prevented over **2,300** tons of materials from entering the storm drain system

Established a Countywide Salt Management Plan

Published a Good Housekeeping Plan

PUBLIC EDUCATION

Conducted over **2,200** outreach efforts

STORMWATER RESTORATION

Achieved over **1,300** acres of impervious surface restoration since FY19

Achieved over **7,200** acres of impervious surface restoration since FY02 (first generation of MS4 permits)

FINANCIAL

Expanded over **$269** million in operating fund and **$57** million in capital fund

1. Introduction

This submission by the Montgomery County (the County) Department of Environmental Protection (DEP) to the Maryland Department of the Environment (MDE) fulfills the annual progress report requirement as specified in Part V of the Municipal Separate Storm Sewer System (MS4) Permit Number 20-DP-3320 MD0068349 (MS4 Permit or the Permit). DEP is submitting its fourth report in this current permit cycle (November 5, 2021, through November 4, 2026), the georeferenced database, referred to in this report as the National Pollutant Discharge Elimination System (NPDES) MS4 Geodatabase, and supplemental databases (MDE 2021; MDE 2025). The NPDES MS4 Geodatabase has been developed in accordance with MDE's NPDES MS4 Geodatabase Design and User's Guide (Version 2.1; MDE 2025) and Draft Supplement to the Geodatabase Design and User's Guide (Version 1.2 Draft Updates; MDE 2021). This report highlights the progress the County has made between July 1, 2024, and June 30, 2025.

The County continues to implement restoration projects required to meet the current permit restoration goal and local total maximum daily loads (TMDLs). As of fiscal year 2025 (FY25), the County has achieved 72 percent of its restoration goal by deploying street sweeping and catch basin cleaning programs, installing environmental site design (ESD) projects, constructing stream restorations (SRs), constructing pond retrofits and outfall stabilization projects, and volunteer programs such as RainScapes and Tree Montgomery.

The County continues to maintain adequate legal authority, conduct illicit discharge detection and elimination (IDDE) inspections, implement a best management practice (BMP) inspection and maintenance (I&M) program, enhance property management programs to reduce stormwater pollution, expand water quality pollution awareness outreach programs, and assure adequate funding for Permit-required programs.

In December 2025, the County submitted a Countywide TMDL Stormwater Implementation Plan to MDE. The Countywide TMDL Stormwater Implementation Plan demonstrates the County's progress toward meeting waste load allocations (WLAs) for approved local TMDLs and Chesapeake Bay TMDLs. The County also submitted monitoring data for the spring 2022 and spring 2023 monitoring seasons in accordance with the Statewide MS4 Biological Database Data Guide.

According to the requirements of the MS4 Permit, the County must reapply for NPDES stormwater discharge permit coverage in its fourth-year annual report. The reapplication must include an executive summary of the NPDES stormwater management (SWM) program that specifically describes how the County is meeting the overall goal of thoroughly evaluating each County watershed. The reapplication must also describe the County's progress in implementing water quality improvements to the maximum extent practicable (MEP). The reapplication is provided in Section 3 of this report.

This FY25 MS4 Annual Report has been organized based on the headings in Permit Part IV (Standard Permit Conditions) to document the implementation of required elements. Required elements of the Permit are presented in a box format at the beginning of each main section.

2. Standard Permit Conditions

2.A Permit Administration

The Permit language of the County's MS4 Permit Part IV.A, Permit Administration, is provided as follows:

> << Montgomery County shall designate an individual to act as a liaison with the MDE (Department) for the implementation of this Permit. The County shall provide the coordinator's name, title, address, phone number, and email address. Additionally, the County shall submit in its annual reports to the Department an organizational chart detailing personnel and groups responsible for major NPDES program tasks in this Permit. The Department shall be notified in annual reports of any changes in personnel or organization relative to NPDES program tasks. >>

The designated individual to act as a liaison with the MDE is as follows:

Amy Stevens, Chief
Watershed Restoration Division
Department of Environmental Protection
2425 Reedie Drive, 4th Floor
Wheaton, Maryland 20902
240-777-7766
Amy.Stevens@montgomerycountymd.gov

Table 2.A-1 lists County personnel responsible for major NPDES program tasks and their contact information (as of September 2025).

Table 2.A-1. Organization Chart for Montgomery County Permit-required Programs

Permit Section	Permit Section Description	Department	Name	Title	Telephone
Part IV.A	Organization Chart—Liaison with MDE for Permit Implementation	DEP	Amy Stevens	Chief, Watershed Restoration Division	240-777-7766
Part IV.B	Legal Authority	OCA	Walter Wilson	Associate County Attorney	240-777-6759
Part IV.C	Source Identification	DEP	Vicky Wan	Chief, Strategic Services Division	240-777-7722
Part IV. D.1	SWM (Implementation, Information, and Construction Inspections)	DPS	Linda Kobylski	Chief, Land Development Division	240-777-6346
Part IV. D.1	SWM Facility Inspections and Maintenance	DEP	Pam Parker	Chief, Stormwater BMP Inspection and Maintenance Section	240-777-7758
Part IV. D.2	Erosion and Sediment Control	DPS	Linda Kobylski	Chief, Land Development Division	240-777-6346
Part IV. D.3	IDDE (Outfall Inspection and Commercial and Industrial Surveys)	DEP	Amy Stevens	Chief, Watershed Restoration Division	240-777-7766
Part IV. D.3	IDDE (Compliance and Enforcement)	DEP	Steve Martin	Supervisor, Environmental Compliance Group	240-777-7746
Part IV. D.4	Property Management and Maintenance	DGS	Gus MontesDeOca	Chief, Division of Facilities Management	240-777-6175
Part IV. D.4	Property Management and Maintenance	MCDOT	Richard Dorsey	Chief, Division of Highway Services	240-777-7600
Part IV.D.4	Property Management and Maintenance	DEP	Willie Wainer	Chief, Recycling and Resource Management Division	240-777-6402
Part IV.D.4	Property Management and Maintenance (Trash and Litter Control Efforts)	DEP	Amy Stevens	Chief, Watershed Restoration Division	240-777-7766
Part IV.D.5	Public Education	DEP	Amy Stevens	Chief, Watershed Restoration Division	240-777-7766
Part IV.E	Stormwater Restoration	DEP	Amy Stevens	Chief, Watershed Restoration Division	240-777-7766

Permit Section	Permit Section Description	Department	Name	Title	Telephone
Part IV.E	Stormwater Restoration	MCDOT	Dan Sheridan	Chief Engineer, Department of Transportation	240-777-7283
Part IV.F	Countywide TMDL Stormwater Implementation Plan	DEP	Amy Stevens	Chief, Watershed Restoration Division	240-777-7766
Part IV.G	Assessment of Controls	DEP	Amy Stevens	Chief, Watershed Restoration Division	240-777-7766
Part IV.H	Program Funding	DEP	Anthony Skinner	Chief Business Operations	240-777-6438
Part V.	Program Review and Annual Progress Reporting	DEP	Amy Stevens	Chief, Watershed Restoration Division	240-777-7766
Part VI.	Special Programmatic Conditions	DEP	Amy Stevens	Chief, Watershed Restoration Division	240-777-7766

DEP = Montgomery County Department of Environmental Protection, 2425 Reedie Drive, 4th Floor, Wheaton, Maryland 2090
DGS = Montgomery County Department of General Services, 101 Monroe Street, 9th Floor, Rockville, Maryland 20850
DPS = Montgomery County Department of Permitting Services, Division of Land Development Services, 2425 Reedie Drive, 4th Floor, Wheaton, Maryland 20902
MCDOT = Montgomery County Department of Transportation, Division of Highway Services, 101 Orchard Ridge Drive, 2nd Floor, Gaithersburg Maryland 20878
OCA = Office of the County Attorney, 101 Monroe Street, 3rd Floor, Rockville, Maryland 20850

2.B Legal Authority

The Permit language of the County's MS4 Permit Part IV.B, Legal Authority, is provided as follows:

> <<Montgomery County shall maintain adequate legal authority to meet this Permit's requirements in accordance with NPDES regulations at 40 CFR §122.26 throughout the term of this Permit. In the event that any provision of its legal authority is found to be invalid, the County shall notify the Department in writing within 30 days and make the necessary changes to maintain adequate legal authority within one year of notification. All changes shall be included in the County's annual report.>>

2.B.1 Montgomery County Code

County laws in the County Code Chapter 19, Erosion, Sediment Control, and SWM, provide sufficient legal authority to enable the County to meet the MS4 Permit requirements. Beyond Chapter 19, other legislation has been enacted to support water quality protection programs required under the Permit. The laws are as described in Table 2.B-1.

Table 2.B-1. MS4 Permit Requirements and Established Legal Authority

MS4 Permit Section	Montgomery County Code	Authority Description
IV.D.1. Stormwater Management	Chapter 19, Article II: Storm Water Management	Governs County SWM program, including BMP I&M requirements.
IV.D.2. Erosion and Sediment Control	Chapter 19, Article I: Erosion and Sediment Control	Establishes Countywide erosion and sediment control (ESC) requirements.
IV.D.3. Illicit Discharge Detection and Elimination	Chapter 19, Article IV: Water Quality Control	Prohibits non-permitted pollutant discharge to waterbodies and establishes an inspection and enforcement regime.
IV.D.4.c.iii. Reduce pollutants associated with the maintenance of County-owned properties	Chapter 19, Chapter 33B: Pesticides	Restricts using certain substances on lawns, places notification requirements on pesticide retailers and applicators, and requires the County Parks Department to implement a pesticide -free program.
IV.D.4.e. Evaluate current litter control problems	Chapter 48, Article VI: Solid Waste, Disposable Food Service Products and Packaging Materials	Requires disposable food service ware purchased and used in the County to be either recyclable or compostable.
	Chapter 52, Article IX: Taxation, Carryout Bag Tax	Generates revenue for the County's SWM programs and reduces paper or plastic bags provided at point of sale.
IV.D.3.f. and g. Respond to illegal discharges, dumping, and spills	Chapter 48, Article I: Solid Waste, In General	Prohibits disposing of garbage and other solid waste on certain public and private properties.

2.B.2 Co-permittees

The County continues its oversight, inspection, and enforcement authority over the Towns of Chevy Chase, Kensington, Poolesville, and Somerset; Chevy Chase Village; and one special tax district, the Village of Friendship Heights. The Town of Somerset is not listed under Part I.B Permit Area of the 2021 Permit but continues to be overseen by the County following Part I.B Permit Area of the 2010 Permit. Municipality contacts are shown in Table 2.B-2.

Montgomery County Public Schools (MCPS) designated Brian Mullikin, Division of Maintenance Environmental Team Leader, and Agustin Diaz, Environmental Specialist, as staff responsible for implementing SWM programs and coordinating Permit issues.

Table 2.B-2. List of Contacts for Co-permittees

Co-permittee	Contact Name and Title	Address	Telephone
MCPS	Brian Mullikin, MHS Environmental Team Leader	8301 Turkey Thicket Drive, Building A, 1st Floor Gaithersburg, Maryland 20879	240-740-2324
Chevy Chase Village	Shana R. Davis-Cook, Village Manager Jacqueline Parker, Director of Municipal Operations	Chevy Chase Village Hall 5906 Connecticut Avenue Chevy Chase, Maryland 20815	301-654-7300
Village of Friendship Heights	Julian Mansfield, Village Manager	4433 South Park Avenue Chevy Chase, Maryland 20815	301-656-2797
Town of Chevy Chase	Todd Hoffman, Town Manager	4301 Willow Lane Chevy Chase, Maryland 20815	301-654-7144
Town of Kensington	Matthew J. Hoffman, Town Manager	3710 Mitchell Street Kensington, Maryland 20895	301-949-2424
Town of Poolesville	Wade Yost, Town Manager	P.O. Box 158 Poolesville, Maryland 20837	301-428-8927
Town of Somerset[1]	Matthew Trollinger, Town Manager	4510 Cumberland Avenue Chevy Chase, Maryland 20815	301-657-3211

[1] The Town of Somerset is not listed under Part I.B Permit Area of the 2021 Permit but continues to be overseen by the County under Part I.B Permit Area of the 2010 Permit.

MHS = Master of Health Science

2.C Source Identification

The Permit language of the County's MS4 Permit Part IV.C, Source Identification, is provided as follows:

<< Sources of pollutants in stormwater runoff jurisdiction-wide shall be identified by Montgomery County and linked to specific water quality impacts on a watershed basis. A georeferenced database shall be submitted annually in accordance with *Maryland Department of the Environment, National Pollutant Discharge Elimination System, Municipal Separate Storm Sewer System, Geodatabase Design and User's Guide (Version 1.2, May 2017),* (hereafter MS4 Geodatabase) or as noted below that includes information on the following:

1. Storm drain system: all infrastructure, major outfalls, inlets, and associated drainage areas delineated (to be submitted as a supplemental geodatabase);
2. Industrial and commercial sources: industrial and commercial land uses and sites that the County has determined have the potential to contribute significant pollutants (to be submitted as a supplemental geodatabase);
3. Urban best management practices (BMPs): stormwater management facility data for new and redevelopment, including outfall locations and delineated drainage areas;
4. Impervious surfaces: public and private land cover delineated, controlled and uncontrolled impervious areas based on, at a minimum, Maryland's hierarchical eight-digit sub-basins;
5. Monitoring locations: locations established by Montgomery County for chemical, biological, and physical monitoring of watershed restoration efforts and the 2000 Maryland Stormwater Design Manual, unless participating in the pooled monitoring program, as described in PART IV.G; and
6. Water quality improvement projects: Restoration projects implemented in accordance with PART IV.E.3 including stormwater BMPs, programmatic initiatives, and alternative control practices in accordance with the *Accounting for Stormwater Wasteload Allocations and Impervious Acres Treated Guidance for National Pollutant Discharge Elimination System Stormwater Permits (2021)*, hereafter (2021 Accounting Guidance), including projects proposed, under construction, and completed with associated drainage areas delineated. >>

The County has transitioned the MS4 Permit data into the required MDE NPDES MS4 Geodatabase (Version 2.1, MDE 2025). Due to the complexity of transitioning the data, the County has identified several gaps in the data and continues to work toward bridging these data gaps.

2.C.1 Storm Drain System

The County's storm drain system data are provided in the Supplemental Geodatabase. This data set contains the known storm drain infrastructure, major outfalls, and inlets; it also includes the outfall feature class and outfall drainage area feature class.

2.C.2 Industrial and Commercial Sources

The industrial and commercial land uses and sites that the County has determined to have the potential to contribute significant pollutants are submitted in the Supplemental Geodatabase.

2.C.3 Urban Best Management Practices

SWM facility data, outfalls, and associated drainage area data can be found in the BMP Feature Class, BMP Drainage Area Feature Class, Outfall Feature Class, and Outfall Drainage Area Feature Class of the NPDES MS4 Geodatabase. The County continued to identify and close data gaps for urban BMPs that were previously not collected or collected in a format that does not meet the requirements of the NPDES MS4 Geodatabase. A description of those data gaps for each feature class follows:

- BMP Feature Class:
  - QUAN_MGMT, PE-REQ, and PE_ADR – The data are not available for most records, because the County did not track this information in a database format. The County is working on gathering these data for permits issued after FY22 and will populate new BMPs added to the NPDES MS4 Geodatabase with the data, if available. BMPs with a 2022 or earlier built date will not have the data.
  - IMP_ACRES – A few records do not have impervious acres (IAs) calculated. The County will populate the data after the IAs are calculated.
  - PE_PRE_CONV and PE_TOTAL_STORAGE – These data are not available for some restoration BMPs. The County is working on gathering this information and will populate the NPDES MS4 Geodatabase with the data after they are available.
  - WQT_IMP_ACR_CREDIT, TN_REDUCTION, TP_REDUCTION, and TSS_REDUCTION – Most BMPs from new and redevelopment and past restoration projects do not have this calculated. The County will populate the data after they are calculated.
  - WM_IMP_ACR_CREDIT and GSI_IMP_ACR_CREDIT – The data for extra credit are not being claimed for some BMPs; therefore, the data are not populated.
  - TOT_IMP_ACR_CREDIT – The data have not been calculated for some BMPs. The County will populate the data after they are calculated.
  - IMPL_COST – Cost data were not available for the individual BMPs for some past restoration projects. The County is gathering the restoration project cost data and will populate the NPDES MS4 Geodatabase with the data after they are available.
- BMP Drainage Area Feature Class:
  - The County has not delineated drainage areas for 129 BMPs. The County will continue to work on delineating these drainage areas.
- Outfall Feature Class:
  - SIZE_OUTFALL – These data are not available. The County will continue to work on gathering and populating the data.
  - OUT_YEAR – These data are not available. Because this field cannot be null, a placeholder date of January 1, 1900, is provided. The County will continue to work on gathering and populating the data.
- Outfall Drainage Area Feature Class:
  - The County has delineated some drainage areas in FY25, decreasing the number of outfalls without a drainage area from 10,828 outfalls in FY24 to 10,719. The County will continue to work on delineating these drainage areas.

2.C.4 Impervious Surfaces

The Impervious Surface Associated Table of the NPDES MS4 Geodatabase summarizes the County's impervious surfaces. The controlled and uncontrolled impervious surface within the County's permit area by Maryland's hierarchical eight-digit sub-basins are summarized below in Table 2.C-1.

Table 2.C-1. Impervious Surfaces by Maryland HUC-8 Sub-basins

MD HUC-8 Sub-basins	Impervious Surface within the County's Permit Area (acres)	Impervious Surface Controlled (acres)	Impervious Surface Uncontrolled (acres)
Anacostia River	7,886.22	3,411.29	4,474.93
Cabin John Creek	3,534.91	572.72	2,962.19
Lower Monocacy River	257.90	44.28	213.62
Potomac Direct	6,041.24	1,377.65	4,663.59
Rock Creek	8,329.02	2,074.43	6,254.59
Rocky Gorge Dam	1,536.39	468.02	1,068.37
Seneca Creek	7,407.04	3,872.11	3,534.93
Upper Patuxent River	202.37	16.90	185.48
Total:	**35,195.09**	**11,837.39**	**23,357.70**

2.C.5 Monitoring Locations

The County concluded the Breewood Tributary monitoring at the end of calendar year (CY) 2022 and entered into the Pool Monitoring Program administered by the Chesapeake Bay Trust (CBT) on October 13, 2023. This feature class was removed from the latest geodatabase schema.

2.C.6 Water Quality Improvement Projects

The NPDES MS4 Geodatabase contains the geographic information system coverage and associated attribute information for watershed restoration projects completed, under construction, and under design. As mentioned, the County invested a considerable effort over the last year to transition the MS4 data to the NPDES MS4 Geodatabase format. As part of this effort, the County discovered data gaps for water quality improvement projects data that were previously not collected or were collected in a format that does not meet requirements for the NPDES MS4 Geodatabase. Following are descriptions of those data gaps for each feature class:

- Alternative BMP Line Feature Class:
  - **IMPL_COST –** Cost data were not available for individual BMPs for some past restoration projects. The County is working on gathering restoration project cost data and will populate the NPDES MS4 Geodatabase with the data once they become available.

- Stream Restoration Protocols Associated Table:
  - MDE requested the following item be addressed in the County's FY25 MS4 Annual Report: "*Continue to provide supporting documentation verifying credits and pre- and post-restoration photos for stream restoration projects completed during FY25*."

    County response: Supporting documentation for completed stream restoration and outfall stabilization projects are reported in the NarrativeFiles feature table.
  - The County maintains extensive documentation on completed projects in its inventory for monitoring, inspection, and maintenance purposes.
  - The geodatabase includes documents for completed stream restoration and outfall stabilization projects credited using restoration protocols. Moving forward, the County will provide documentation for completed projects as they are completed and reported in the geodatabase.
- Alternative BMP Point Feature Class:
  - **IMPL_COST –** Cost data were not available for wastewater treatment plant (WWTP) connections and septic denitrification points because this work was completed by the private owner. This gap will not be filled and remain as $0.
  - **BUILT_DATE –** Built date information for WWTP connections is not available. The County is working on gathering these data and will populate the database, if available.
- Alternative BMP Polygon Feature Class:
  - **TN_REDUCTION, TP_REDUCTION, and TSS_REDUCTION –** These data have not been calculated for projects credited towards the 2010 Permit. The County will populate these data after they are calculated.
  - **IMPL_COST –** Cost data were not available for individual BMPs for some past restoration projects. The County is working on gathering the restoration project cost data and will populate the NPDES MS4 Geodatabase with the data after they are available.

2.C.7 Other Data Gaps

This section presents data gaps not addressed in the previous sections. These data gaps are a result of the data not being previously collected or being collected in a format that does not meet the requirements of the NPDES MS4 Geodatabase. The following are descriptions of those data gaps:

- Geodatabase Schema
  - MDE requested the following items be addressed in the County's FY25 MS4 Annual Report: *"The Maryland Department of the Environment (Department) sent out an updated version in October 2024 and requests that all jurisdictions use the 2024 version of the Geodatabase in future submissions."*

    County response: The County is submitting its FY25 Geodatabase in accordance with the updated October 2024 version with the FY25 Annual Report.
- BMP Inspections Associated Table:
  - **INSP_STATUS –** The County's asset maintenance management system incorporated a pass/fail inspection status field in FY24. The inspection status field was populated for the BMPs inspected during the CY. All other BMPs will be assigned an inspection status as they are inspected in the

future. MDE noted the following on the County's FY25 MS4 Annual Report: *"The BMP Inspections table contains 24,458 total records, of which 2 BMPs are marked as failed (BMP IDs MO24BMI000803, MO24BMI000706)."*

County response: Status update and resolution for BMP IDs MO24BMI000803 (Local BMP ID 11040) and MO24BMI000706 (Local BMP ID 11152) are reported in Section 2.D.1.d of the County's FY24 MS4 Annual Report.

- **INSP_DATE –** Approximately 46 percent of the County's BMP inspection data do not have a valid inspection date. A small percentage of these BMPs were voluntarily installed as part of the County's RainScapes and Watershed Restoration Grant programs. The County started an inspection program for these BMPs and will continue populating the inspection date as the BMPs are inspected. The County also has several thousand single-family residential (SFR) BMPs installed on private property through the new development and redevelopment permit process. A portion of these BMPs was permitted without an easement. The County has an inspection program specific for these BMPs and continues to work on conducting the inspection; however, several thousand BMPs do not have a valid inspection date. More information is provided on these SFR BMPs in Section 2.D.1.d of this report. MDE noted the following on the County's FY24 MS4 Annual Report: *"The Department recognizes that the County recently developed a contractual mechanism to begin inspections of BMPs on SFR lots and that these inspections are underway in the current fiscal year (FY2025). Please provide a best-estimate schedule of when the County anticipates all inspections of SFR BMPs to be completed."*

  County response: The County began contractual inspections of BMPs on SFR lots with easements in FY25. These inspections are planned on a triennial cycle, with completion targeted by the end of CY27. For the SFR lots without easements or right-of-entry (ROE) agreements, the County continues outreach efforts to encourage self-reporting. However, because of limited property access, providing a reliable schedule for completing inspections at those locations is difficult.

- Alternative BMP Inspections Associated Table:
  - **INSP_DATE and ALTBMP_STATUS –** The County data provided for Alternative BMP Inspections Associated Table have known data gaps for inspection date and status for streams, outfalls, RainScapes impervious surface removal, trees, and septic systems. The County is working on developing a program to ensure all trees are inspected and inspection data and status are tracked. The County has a contractor performing stream and outfall inspection and will close this gap for this data over the next year. The County is working on addressing the data gaps for inspection data of best available technology septic systems, street sweeping, and inlet cleaning. MDE noted the following on the County's FY24 MS4 Annual Report:
    - *"5,577 active Poly BMPs (Tree Planting) have an inspection date prior to FY2022, of which 2,044 have an inspection date prior to FY2020. Please ensure land cover conversion BMPs (tree plantings in this case) are inspected on a triennial basis to confirm the saplings are flourishing and well maintained to achieve the associated credit."*

      County response: The referenced BMP in this case is Street Trees, which are widely distributed across the County. Because of the high volume of trees and their broad geographic spread, conducting triennial inspections for each site presents logistical challenges. The County recognizes the importance of confirming that these plantings thrive and remain well-maintained to support the associated credit. To address this, the County is

currently developing an alternative inspection method that will allow for a more effective assessment of tree health and maintenance status while accounting for the scale and distribution of the program.

- *"Ensure septic pumping (SEPP) BMPs are inspected annually with the date reported in the Geodatabase."*

  County response: The County is developing a pilot program for inspection and reporting of septic pumping.

- *"Ensure septic denitrification (SEPD) BMPs are verified annually; reporting dates is optional."*

  County response: The County is aware of this program gap and is working toward a resolution.

- SWM Associated Table:
  - **PLAN_EXPT –** This information is not tracked. The County does not issue SWM exemptions. If a project is exempt from SWM requirements, then no application is required.
  - **WAIV_REQ, WAIV_REQ_QT, COMB_REQ, and TOTAL_REQ –** This information is not tracked by the County. Each project is reviewed on its merits, and full stormwater compliance is required by the County where feasible.
- Erosion Sediment Control Associated Table:
  - **OTHER_ISSUED, OTHER_ACTIVE, and DIST_ACTIVE_OTH** – This information is not available.

2.D Management Programs

2.D.1 Stormwater Management

The Permit language of the County's MS4 Permit Part IV.D.1, Stormwater Management, is provided as follows:

<< An acceptable stormwater management program will be maintained by the County in accordance with the Environment Article, Title 4, Subtitle 2, Annotated Code of Maryland. Activities to be undertaken by the County shall include, but not be limited to, the following:

a. Implementing the stormwater management design policies, principles, methods, and practices found in the latest version of the *2000 Maryland Stormwater Design Manual.* This includes the following:
    i. Complying with the Stormwater Management Act of 2007 (Act) by implementing environmental site design (ESD) to the maximum extent practicable (MEP) for all new and redevelopment projects
    ii. Tracking the progress toward satisfying the requirements of the Act and annually identifying and reporting the problems and modifications necessary to implement ESD to the MEP
    iii. Reporting annually the modifications that have been or need to be made to all ordinances, regulations, and new development plan review and approval processes to comply with the requirements of the Act

b. Maintaining programmatic and implementation information related to the stormwater management program including, but not limited to, the following:
    i. Number of Concept, Site Development, and Final plans received and number of those approved (plans that are resubmitted as a result of a revision or in response to comments should not be considered as a separate project)
    ii. Number of redevelopment projects received and number of those approved
    iii. Number of stormwater exemptions issued
    iv. Number and type of waivers received and issued, including those for quantity control, quality control, or both (multiple requests for waivers may be received for a single project and each should be counted separately, whether part of the same project or plan)

c. Maintaining construction inspection information according to COMAR 26.17.02 for all ESD treatment practices, structural stormwater management facilities, and stable stormwater conveyance and capacity to receiving waters, including the number of inspections conducted and violation notices issued by the County.

d. Conducting preventative maintenance inspections, according to COMAR 26.17.02, of all ESD treatment systems, structural stormwater management facilities, and stable stormwater conveyance and capacity to receiving waters, at least on a triennial basis. Documentation identifying the ESD systems and structural stormwater management facilities inspected, the number of maintenance inspections, follow-up inspections, the enforcement actions used to ensure compliance, the maintenance inspection schedules, and any other relevant information will be submitted in the County's annual reports. >>

2.D.1.a Implementing Stormwater Management Design

DPS administers SWM design policies, principles, methods, and practices found in the latest version of the *2000 Maryland Stormwater Design Manual* in the County (MDE 2000). DPS also has additional requirements for some SWM practices. New development and redevelopment in the County complies with or exceeds the requirements of the Stormwater Management Act of 2007 (Act).

Local SWM requirements are stricter than state minimum standards. MDE standards include a SWM exemption for projects that disturb fewer than 5,000 square feet, while DPS requires sediment control and SWM to be addressed for any new home or commercial building construction regardless of the disturbance area. This requirement accounts for many SWM waivers issued by DPS during FY25 because SFR teardown projects would not have been required to address SWM by the state minimum standards. DPS also exceeded the state standard for SWM compliance for redevelopment projects when it incorporated ESD into the County Code. DPS requires all redevelopment projects to address ESD to the MEP. This approach, while generally successful in obtaining ESD compliance on most projects, can be expected to generate additional waivers due to limitations of existing site conditions, such as poor soils and shallow receiving storm drain systems.

DPS tracks progress on satisfying Act requirements. During FY25, no problems or modifications were identified, and no modifications were made to ordinances, regulations, or approval processes.

2.D.1.b Program Implementation

DPS is responsible for implementing programmatic requirements for SWM plan review and permitting. Table 2.D-1 summarizes reviews and approvals during FY25. A full list of all SWM plans is provided in NPDES MS4 Geodatabase, SWM Associated Table.

Table 2.D-1. MS4 Permit and Plan Reviews during Fiscal Year 2025

MS4 Permit Requirement	Quantity
Approved concept designs	91
Site development	5
Final plans[1]	476
Redevelopment	26
Waivers	181

[1] Total sediment control plan approvals within FY25 are based on unique grading permit numbers and includes permits issued for SWM concept applications submitted in previous years, multiple permits under the same concept file number, and projects for which a separate stormwater conceptual submission is not required.

2.D.1.c Construction Inspections

Section 2.D.2 provides details for the County's ESC program and inspections during construction. Data for construction inspections are provided in NPDES MS4 Geodatabase, Erosion Sediment Control Associated Table.

2.D.1.d Best Management Practice Documentation, Maintenance, and Inspections

Inventory and Maintenance Responsibilities

The DEP Stormwater BMP Inspection and Maintenance (SWIM) Program oversees I&M of all SWM BMPs under County jurisdiction. DEP performs all triennial preventative maintenance inspections on SWM BMPs to identify maintenance needs. DEP performs structural maintenance on BMPs owned by the County, MCPS, and the Maryland-National Capital Park and Planning Commission (M-NCPPC), as well as structural and nonstructural maintenance on ESD BMPs located on County property and rights-of-way (ROWs). DEP is also responsible for performing structural maintenance of BMPs on residential properties where maintenance responsibility has been transferred to the County (the private property owner remains responsible for nonstructural maintenance). Property owners are responsible for all maintenance on ESD BMPs on their property. SWM BMPs are also in place for private commercial and residential properties where all structural and nonstructural maintenance is the responsibility of the property owner.

The data reported for FY25 represent DEP's I&M responsibilities as defined in County Code (Chapter 19) and Part IV.D.1.d of the 2021 MS4 Permit. Data for all inspections are provided in NPDES MS4 Geodatabase, BMP Inspections Associated Table.

Stormwater Management Best Management Practice: Inspections and Enforcement

DEP conducts, tracks, and reports all SWM BMP inspections, including the following:

- Triennial preventative maintenance inspections, which also include water quality protection charge (WQPC) self-inspections by SFR property owners for WQPC credit.
- Maintenance follow-up inspections, which also include unscheduled inspections for compliance, enforcement, and responses to complaints.

DEP also annually inspects County-owned property and maintained high and significant hazard dams and levees. To enforce SWM BMP maintenance, DEP issues notices of violation (NOVs). The number of FY25 SWM BMP triennial inspections, follow-up inspections, and NOVs are summarized in Table 2.D-2.

Table 2.D-2. Stormwater Management Best Management Practice Inspections and Enforcement Completed during Fiscal Year 2025

Inspection Type	Quantity
SWM BMP Triennial Inspections	5,048
SWM BMP Follow-up Inspections	6,922
SWM BMP Maintenance NOV	1,121

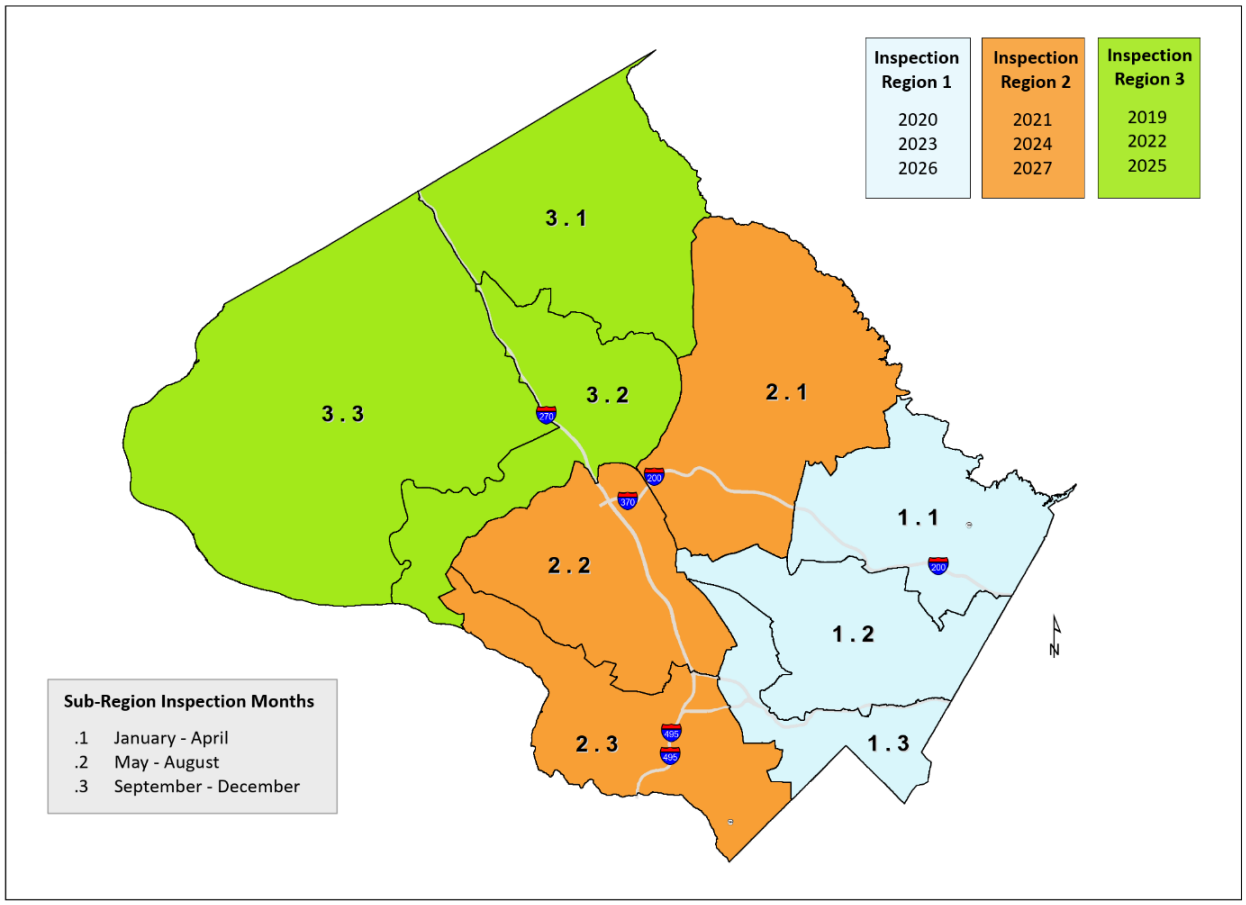
Stormwater Management Best Management Practice: Triennial Inspections

The purpose of the triennial inspections, which are conducted under DEP's triennial inspection contract, is to identify repairs and maintenance needs. The County is divided into three geographical regions for triennial inspections, and each geographical region is divided into three subregions, as depicted on Figure 2.D-1. Figure 2.D-1 also shows the CY that the triennial inspections will be performed for any given inspection region, through 2027. Fiscal reports will always include I&M information for two regions because DEP schedules work on CY. The number of triennial inspections conducted in FY25 are listed in Table 2.D-2.

DEP inspects ESD BMPs located primarily on nonresidential and public property where the County has a SWM easement and maintenance agreement. ESD BMPs on SFR properties are inspected under a different program. Where DEP has ROE to perform inspections, DEP makes additional efforts to contact the private residents to inform them of the inspection and provide information on the practice, its function, and maintenance.

When ESD BMPs were first required by County Code (beginning July 2010), the County did not require easements on SFR properties that would allow the County access to inspect permitted ESD BMPs. The County began requiring easements for ESD on SFR properties on January 1, 2017. However, many permits were approved before January 1, 2017, including a large number (more than 6,600) of existing ESD BMPs on SFR lots where DEP has no legal access via an easement to conduct inspections. Thus, the County continues to have thousands of SFR BMPs where DEP cannot perform inspections.

Figure 2.D-1. Triennial Stormwater Inspection Regions and Subregions



As MDE noted in the comments on the FY22 MS4 Annual Report, SFR ESD BMPs "remain the County's largest hurdle to ramping up its triennial inspections. The County should continue these efforts to fulfill its triennial inspection requirement."

To address MDE's comment, DEP has taken the following actions to increase the number of triennial inspections of ESD BMPs on SFR properties:

- DEP continues to promote the online self-inspection approach that allows property owners to claim credit against their WQPC for any ESD BMPs on their property. DEP considers self-certification to be

equivalent to a triennial inspection. The online inspection form provides ESD BMP maintenance information, and DEP continues to work with private property owners to provide resources to help them perform yearly inspections and required maintenance on the ESD BMPs on their property. DEP recommends owners inspect their ESD BMPs annually and perform maintenance as necessary.

- DEP sends postcards with WQPC credit program information to SFR property owners with ESD BMPs. DEP then approves compliant self-inspections. In FY25, DEP has continued outreach and education efforts to reach SFR property owners where no ROE is provided, through developing partnerships with watershed groups and homeowners associations (HOAs).
- DEP conducts site visits to verify asset maintenance conditions reported by SFR property owners who participate in the WQPC self-inspection program. The goal of this effort is to conduct annual audits of 10 percent of the approved applications for the credits granted in the prior levy year. This goal was accomplished for FY25. Audits verify that the actual field conditions of the BMPs are accurately self-reported by the property owners in their online WQPC credit application.
- During FY22, a partnership was launched with the Alliance for the Chesapeake Bay and surrounding jurisdictions through a National Fish and Wildlife Foundation grant to develop a residential SWIM Program for Private Property Owners in the Anacostia Watershed. The inspections and outreach through this program began in FY24 and continues through December 2025. Plans for FY26 include expanding a cost-share maintenance element of the grant to property owners with MS4 Permit ESD practices on lots with ROE and developing and piloting a potential County Clean Water Grant track to continue these efforts.
- In FY24, DEP developed a contractual mechanism to perform inspections of SFR ESD BMPs on a property basis rather than an individual BMP basis since there are often multiple BMPs on a single property. This contractual approach allows for cost savings over the cost of conducting each inspection individually. These inspections began in FY25 in Region 1 and DEP will continue to make progress on inspections of SFR ESD BMPs with ROE on a triennial basis. Although inspections are contractually conducted on a property basis, the inspection results for each asset are recorded and individually reported to MDE.

Stormwater Management Best Management Practice: Follow-up Inspections

DEP conducts maintenance follow-up inspections outside of the triennial inspection program. These inspections verify completed work, confirm compliance, and investigate public complaints. Table 2.D-2 summarizes the completed follow-up inspections. The number of all enforcement actions is provided in NPDES MS4 Geodatabase, SWM Associated Table.

Stormwater Management Best Management Practice: Maintenance Enforcement

DEP issues NOVs to enforce SWM BMP maintenance. The number of NOVs issued in FY25 are included in Table 2.D-2. During FY25, no maintenance violations required issuance of citations or additional enforcement actions outside of the NOVs. However, two BMPs failed inspection. For BMPs that failed inspection, DEP takes action to resolve the issue. Table 2.D-3 lists BMPs that failed inspection and how the issue is being resolved.

Table 2.D-3. Best Management Practices that Failed Inspection

BMP Identification	Location	Year Failed	Reason Failed	Resolution
11574	Pond Ridge HOA	FY25	Corroded corrugated metal pipe	SWM facility is owned by a defunct HOA. There is no property owner to hold accountable. DEP will schedule abandonment or repair subject to Council appropriation of funding.
11045	Chesney	FY25	Corroded corrugated metal pipe	This is a 1980 facility with no access and no SWM easement or SWM maintenance agreement. DEP will schedule abandonment or repair subject to Council appropriation of funding.

In the FY24 MS4 Annual Report, three BMPs were reported as failing inspection. Status updates on the three BMPs are provided in Table 2.D-4.

Table 2.D-4. Best Management Practices that Failed Inspection during Fiscal Year 2024

BMP Identification	Location	Year Failed	Reason Failed	Resolution
12866	Rock Spring Park	FY24	Corroded corrugated metal pipe	In 2024, repairs were scheduled but would be made after date of last report. New information indicates pipe repair was more extensive than expected and original contractor referred owner to another company to bid on pipe replacement. DEP is preparing a Notice of Violation and will elevate as needed until compliance is reached.
11040	Highlands of Darnestown	FY24	Void in dam and corroded corrugated metal pipe riser	This facility is being evaluated for a capital improvement project to repair and/or retrofit, subject to Council appropriation of funding.
11152	Brighton Knolls	FY24	Erosion, corroded corrugated metal pipe, and trees on dam	SWM facility is owned by a defunct HOA. There is no property owner to hold accountable. DEP will schedule abandonment or repair subject to Council appropriation of funding.

In the FY23 MS4 Annual Report, two BMPs were reported as failing inspection. Status updates on the two BMPs are provided in Table 2.D-5.

Table 2.D-5. Best Management Practices that Failed Inspection during Fiscal Year 2023

BMP Identification	Location	Year Failed	Reason Failed	Update
15564	Montgomery County Airpark	FY23	High-hazard dam does not meet MDE 378 standards.	Retrofit was completed in September 2024. This facility no longer has a "failed" status.
11025	Montgomery Village Golf Course	FY23	Privately owned SWM pond built before 1971. Corroded barrel and riser and serious erosion of dam embankment. MDE Dam Safety Division issued NOV to property owner on November 26, 2019. There has been no further action on the part of the property owner to do repairs.	Under enforcement action: Upon the initial failed inspection, the matter was referred to MDE Dam Safety. MDE issued a Notice of Unsafe Condition to the owner. The County continues to work with MDE and the property owner to resolve the issue.

2.D.2 Erosion and Sediment Control

The Permit language of the County's MS4 Permit Part IV.D.2, Erosion and Sediment Control, is provided as follows:

> << An acceptable erosion and sediment control program shall be maintained by the County and implemented in accordance with the Environment Article, Title 4, Subtitle 1, Annotated Code of Maryland. Activities to be undertaken by the County shall include, but not be limited to:
>
> a. Implementing program improvements identified in any Department evaluation of the County's erosion and sediment control enforcement authority;
>
> b. Ensuring that construction site operators have received training regarding erosion and sediment control compliance and hold a valid Responsible Personnel Certification as required by the Department; and
>
> c. Reporting quarterly, information regarding earth disturbances exceeding one acre or more. Quarters shall be based on calendar year and submittals shall be made within 30 days following each quarter. The information submitted shall cover permitting activity for the preceding three months. >>

DPS is responsible for implementing the County's ESC program. The ESC program goal is designed to reduce pollutant loads from new development and redevelopment during construction. The County employs inspection and enforcement actions by issuing violation notices and stop-work orders to enforce compliance with the ESC program. The following are elements of the County's ESC program:

- Reviewing the grading permit applications for earth disturbance
- Inspecting and enforcing grading and ESC regulations
- Inspecting all ESD treatment practices, structural SWM facilities, and stable stormwater conveyance and capacity during and on completion of construction
- Conducting compliance investigations
- Reporting earth disturbances exceeding 1 acre

ESC program implementation information is provided in NPDES MS4 Geodatabase Erosion Sediment Control Associate Table and Quarterly Grading Permit Feature Class. Table 2.D-6 summarizes the ESC enforcement actions taken by DPS during FY25.

Table 2.D-6. Erosion and Sedimentation Control Program Inspection and Enforcement Summary during Fiscal Year 2025

ESC Program Element	Quantity
ESC inspections	26,465
NOV	297
Stop-work orders	98
Number of court cases	27
Number of fines collected	27
Amount of fines collected	$21,000

2.D.2.a Improvements Required by Maryland Department of the Environment

MDE's biennial evaluation of the County's ESC program, as part of its review of the County's application for the delegation of ESC enforcement authority, started on September 2023. Continued delegation was granted through June 30, 2026 (end of FY26), by a letter from Stewart Comstock, P.E., Chief of the MDE Stormwater, Dam Safety, and Flood Management Program. In the letter dated February 6, 2024, Comstock stated the following: "[MDE] also determined the County's program is in compliance with the ESC program requirements of its (MS4) permit (20-DP-3320, MD0068349)." MDE encouraged the County to set deadlines and conduct re-inspections in a timeframe based on severity of the issue and what is realistic for the County and responsible personnel at each site. MDE recommended guidance on required information on inspection reports. DPS made several changes to its inspection report to align with MDE guidance.

2.D.2.b Responsible Personnel Certification

MDE offers an online responsible personnel certification (RPC) program that provides personnel with convenient training that can be scheduled by the individual staff member. Because MDE conducts RPC training online according to its own correspondence, training related data is not provided in this report. DPS verifies that personnel have attended training and hold a valid certification.

2.D.2.c Quarterly Reporting of Grading Permits

The County does not provide MDE with the grading permits on a quarterly basis because MDE has strengthened their notice of intent (NOI) process and receives this information via that process. The County provides FY25 grading permit data for earth disturbances in the County measuring greater than 1 acre in the NPDES MS4 Geodatabase.

2.D.3 Illicit Discharge Detection and Elimination

The County's MS4 Permit Part IV.D.3, IDDE, is as follows:

<< The County shall implement an inspection and enforcement program to ensure that all discharges into, through, or from the MS4 that are not composed entirely of stormwater are either issued a permit by the Department or eliminated. Activities shall include, but not be limited to:

a. Reviewing all County outfalls to prioritize field screening efforts in areas with the greatest potential for polluted discharges. The County must submit the process developed to prioritize outfall screenings to the Department for approval with the first year annual report;

b. Submitting a plan and schedule for field screening the prioritized outfalls for the Department's approval with the first year annual report. The plan and schedule shall include the annual screening of at least 150 outfalls. Each outfall having a dry weather discharge shall be sampled at the time of screening using a chemical test kit. An alternative program may be submitted by the County for the Department's approval that methodically identifies, investigates, and eliminates illegal discharges into, through, or from the County's MS4;

c. Conducting annual visual surveys of commercial and industrial areas as identified in PART IV.C.2 above for discovering, documenting, and eliminating pollutant sources. Areas surveyed and the results of the surveys shall be reported annually;

d. Maintaining written standard operating procedures for outfall screenings, illicit discharge investigations, annual visual surveys of commercial and industrial areas, responding to illicit discharge complaints, and enforcement implementation;

e. Maintaining an ordinance, or other regulatory means, that prohibits illicit discharges into the storm sewer system;

f. Maintaining a program to address and respond to illegal discharges, dumping, and spills; and

g. Using appropriate enforcement procedures for investigating and eliminating illicit discharges, illegal dumping, and spills. When a suspected illicit discharge discovered within the County's jurisdiction is either originating from or discharging to an adjacent MS4, the County must coordinate with that MS4 to resolve the investigation. Significant discharges shall be reported to the Department for enforcement and/or permitting. >>

The MS4 Permit requires the County to implement an inspection and enforcement program to ensure all discharges to and from the MS4 that are not comprised entirely of stormwater are either permitted by MDE or eliminated. The NPDES MS4 Geodatabase includes all outfalls used to identify sites for IDDE screening (Outfall Feature Class) and a list summarizing the results of the FY25 IDDE outfall screening (IDDE Screening Feature Class).

2.D.3.a Selection Process

DEP uses a comprehensive approach to outfall screening that includes screening outfalls each year in a different region of the County, with regions rotating every year. Outfalls near commercial and industrial properties are targeted because these areas have the greatest potential for polluted discharges. The County selects specific outfalls to be screened for illicit discharge using an iterative process. First, watersheds are selected for screening on a rotational basis. Outfalls from the selected watersheds that had pollution issues during a previous screening cycle are the first additions to the yearly list. Outfalls

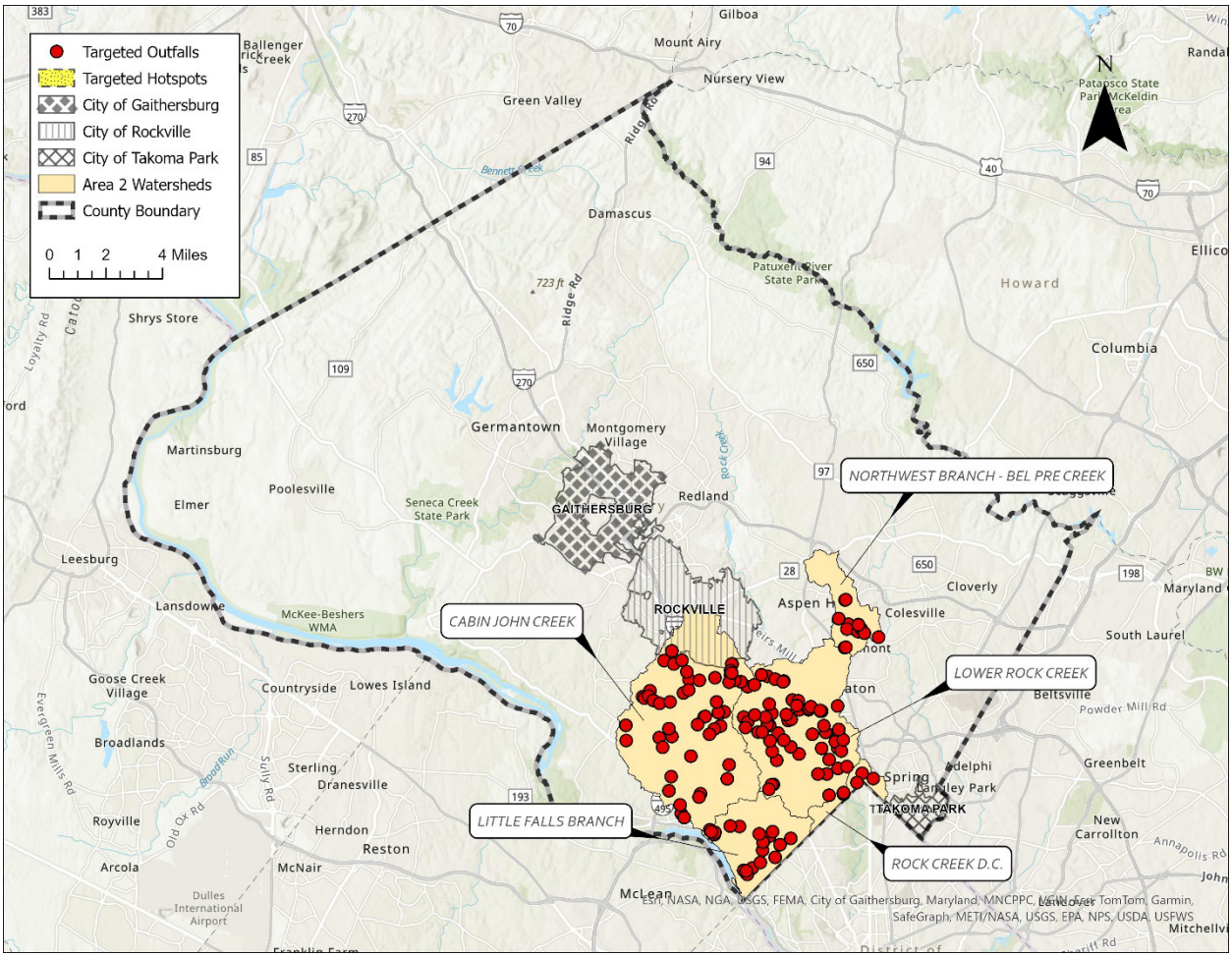
are then added by proximity to commercial and industrial properties, inlets, and streams. Beginning with the closest outfalls, the distance is gradually increased until at least 150 total outfalls have been selected. The standard operating procedures (SOPs) in Appendix A1 provide the annual procedures for identifying and selecting outfalls.

2.D.3.b Plan, Schedule, and Outfall Screening Results

The areas screened during FY25 are in the southern region of the County, predominantly in Silver Spring, Bethesda, and Kensington. NPDES MS4 Geodatabase, IDDE Screening Feature Class, provides all outfalls screened during FY25. All outfalls encountered are categorized, documented, and sampled when dry weather flow is found. Outfalls with no flow are assessed for physical indicators such as pipe benthic growth, corrosion, algae, and structural issues. Outfalls found not currently listed in the County's inventory are assigned identification (ID) numbers in the field, photographed, and their location is marked with a global positioning system point. The ID numbers and pertinent data are forwarded to the DEP geographic information system team for inclusion in the storm drain inventory. Structures, such as road and driveway culverts, that are mistakenly identified in the system as outfalls, are corrected. The SOPs (Appendix A1) detail the annual procedures for performing the outfall screening.

DEP contracted with KCI Technologies, Inc. (KCI) to perform outfall field screening for FY25. During February, March, and April 2025, KCI screened outfalls near commercial and industrial areas in Silver Spring, Bethesda, and Kensington. These areas are located within the Cabin John Creek, Little Falls Branch, Lower Rock Creek, and parts of Northwest Branch watersheds (Figure 2.D-2).

Figure 2.D-2. Locations of the Fiscal Year 2025 Illicit Discharge Detection and Elimination Screening Targeted Outfalls and Targeted Hotspots



DEP does not screen outfalls in the cities of Rockville, Gaithersburg, and Takoma Park.

KCI screened 156 outfalls; no new outfalls were identified during the screening process. Of the 156 outfalls screened, 65 outfalls were found with dry-weather flow. Two outfalls were unable to be sampled because of inadequate flow. Of the 63 outfalls with dry-weather flows sampled, 2 outfalls had a suspicious discharge. The results of the investigations are provided in Table 2.D-7.

Table 2.D-7. Investigation Results of Suspected Illicit Discharges during Fiscal Year 2025

Outfall ID	Location	Problem Found	Resolution
HQ341P0556	10810 Connecticut Avenue Kensington, Maryland, 20895	Elevated chlorine	Source of illicit discharge is still under investigation.
GP561P0204	Contention Ct and Drumaldry Dr. Bethesda, Maryland, 20817	Elevated chlorine	After several follow-ups, no additional chlorine levels were detected. No further issues were observed.

In its comments on the FY24 MS4 Annual Report, MDE noted that 11 sources were still under investigation at the time of the report's submission. During FY24, although all sources were either resolved or no suspicious discharge was detected after subsequent follow-up visits, the follow-up records were unintentionally omitted from the geodatabase because of a data loading issue. The omitted records are attached as a Microsoft Excel document to this year's geodatabase submittal.

2.D.3.c Commercial and Industrial Areas Visual Surveys

The MS4 Permit requires the County to conduct annual surveys of commercial and industrial areas to assess the potential for, and eliminate, if discovered, pollutant sources. DEP conducted 51 surveys of commercial and industrial sites primarily in Silver Spring, Bethesda, and Kensington. Based on the surveys, DEP investigated water quality, grease, and solid waste issues, which resulted in 3 citations, 9 NOVs, and 15 verbal warnings. The formal enforcement actions are summarized in Table 2.D-8, and the entire list of 51 surveyed properties is provided in Appendix A2.

Table 2.D-8. Stormwater Discharge Enforcement Cases Based on Commercial and Industrial Survey Results for Fiscal Year 2025

Case No.	Location Description	Issue	Enforcement Action	Resolved
20251165	Jiffy Lube 3825 DuPont Avenue	Water quality	Verbal warning	Yes
20251166	Stella Point Grille 3739 University Blvd W	Grease	NOV, citation	No
20251171	Dish and Dram Restaurant 10301 Kensington Parkway	Water quality	Verbal warning	Yes
20251200	La Ferme 7101 Brookville Road	Grease	NOV	Yes
20251202	District Taco 1310 East-West Highway	Grease	NOV	Yes
20251202	Giant Food 1280 East-West highway	Water quality	NOV	Yes
20251202	Mamma Lucia 1302 East-West highway	Grease	Citation	Yes
20251204	Sunoco 8384 Colesville Road	Water quality	Verbal warning	Yes
20251207	BBQ Chicken & Beer 2235 Bel Pre Road	Grease	NOV	Yes
20251208	McDonalds 2207 Bel Pre Road	Water quality	Verbal warning	Yes
20251209	Mulheron Tree Experts 2749 Garfield Avenue	Water quality	NOV	Yes
20251211	BP Gas 2601 Forest Glen Road	Solid waste	Verbal warning	Yes

Case No.	Location Description	Issue	Enforcement Action	Resolved
20251212	Black Diamond Restaurant 8407 Ramsey Avenue	Grease	NOV, citation	No
20251244	Mary & Mikes Auto Repair 11500 Schuykill Road	Water quality	Verbal warning	Yes
20251246	Cabin John Village Shopping Center 7817 Tuckerman Lane	Grease, water quality	Verbal warning	Yes
20251296	White Flint Station Shopping Center 11620 Rockville Pike	Grease, water quality	Verbal warning	Yes
20251345	Delnor Center 12100 Nebel Street	Water quality	Verbal warning	Yes
20251346	12001 Nebel Street	Solid waste	Verbal warning	Yes
20251390	Park Potomac Shopping Center 12435 Park Potomac Avenue	Grease	Verbal warning	Yes
20251492	Founding Farmers 12505 Park Potomac Avenue	Grease	NOV	Yes
20251606	Enterprise Rent-A-Car 11760 Parklawn Drive	Water quality	NOV	No
20251808	Bethesda Market 4611 Sangamore Road	Grease	Verbal Warning	Yes
20251809	Georgetown Square Shopping Center 10400 Old Georgetown Road	Water quality	Verbal Warning	Yes
20251858	Montgomery Mall 7101 Democracy Boulevard	Grease	Verbal Warning	Yes
20251904	Audi Bethesda, 5206 River Road	Solid waste	Verbal Warning	Yes

There were no outstanding issues from FY24 that required follow-up.

2.D.3.d Standard Operation Procedures

DEP maintains a set of SOPs for IDDE efforts. These procedures cover outfall screenings, illicit discharge investigations, annual visual surveys of commercial and industrial areas, responding to illicit discharge complaints, and enforcement implementation. These procedures are stored as computer files and can be readily accessed by all personnel involved with IDDE efforts. The County's SOPs are provided in Appendix A1.

2.D.3.e Ordinance and Regulatory Means

DEP addresses water quality issues through the Montgomery County Water Quality Ordinance, Montgomery County Code Chapter 19, Article IV, Section 19-50, subsections (a), (b), and (c).

2.D.3.f Illegal Discharges, Dumping, and Spills

During FY25, the County met MS4 Permit requirements to maintain a program to address and respond to illegal discharges, dumping, and spills. Information on illegal dumping can be found on the County's website (DEP n.d.[c]). Illicit discharge issues tracked to sources outside the County are coordinated with the source location jurisdiction. Illicit discharge sources identified as coming from a state-permitted facility are reported to MDE. The County maintains a 311-call service center that citizens can use to report environmental concerns. DEP is responsible for investigating and enforcing the cleanup of nonemergency small quantity fuel, oil, or chemical spills that do not pose an immediate risk to public health or safety. The County's fire and rescue service responds to emergencies and large quantity spills.

DEP works with Washington Suburban Sanitation Commission (WSSC) by performing follow-up site visits for reported sanitary sewer overflows (SSOs) in the County and performed 57 site visits during FY25. These follow-up site visits verify that SSOs have been corrected, demonstrate a reasonable effort to confirm all affected areas have been adequately treated and cleaned up, and ensure adequate public notice signage has been posted in affected areas. Moreover, DEP continues to work with WSSC's fats, oils, and grease program regarding restaurant grease issues, which directly affect stormwater quality in the County.

2.D.3.g Enforcement

During FY25, 302 complaints were made concerning the illegal dumping of solid waste. The DEP Energy, Climate, and Compliance Division (ECCD) investigated illegal dumping complaints and issued 31 formal enforcement actions (7 civil citations with fines totaling $3,500 and 24 NOVs) and numerous warning letters. Most complaints concerned bags of trash, vegetation (leaves and brush), or other unwanted materials either dumped or being stored on private or public property. Only a small percentage of these cases represented a potential for direct runoff of contaminated material into storm drains or receiving systems. Complaint resolution invariably involved removal and proper disposal of trash and debris and proper storage of other materials (for example, under cover).

During FY25, the ECCD investigated 227 water quality issues: 134 complaints, 57 SSOs, and 36 hazardous materials-related cases. These investigations resulted in 42 formal enforcement actions (14 civil citations with fines totaling $7,500 and 28 NOVs) and numerous warning letters.

DEP began investigating an issue in Willet Branch in FY23. Since summer 2020, the Little Falls Watershed Alliance (LFWA) has been collecting samples of fecal indicator bacteria (FIB) Escherichia coli [E. coli]) at several sites throughout the Little Falls Watershed. During summer 2021, LFWA reached out to the County and WSSC with data showing high levels of FIB coming from an outfall in the Willet Branch tributary. Due to the high FIB, LFWA worked with a private laboratory to collect microbial source information. The information indicated very high levels of human-derived bacteria. Using the information provided by LFWA and WSSC, the County engaged a contractor to perform a bacteria source tracking in the storm drain network upstream of Willet Branch. During the investigation, 16 locations throughout the storm drain network have been sampled and analyzed for signs of illicit discharge, including E. coli and Enterococcus bacteria. Results indicate elevated levels of bacteria in portions of the storm drain network.

During FY24, a significant sewage discharge was tracked to a storm drain line on North Lane in Bethesda. Continued investigations by DEP tracked the source of sewage discharges to the Hyatt Bethesda. DEP engaged with the property owner and building engineers to identify the source; however, due to the complicated construction of the site, professional plumbing assistance was needed to pinpoint the source. During FY25, DEP contracted professional plumbers to assist in the investigation. Hyatt Bethesda

was able to pinpoint the source within their building and made the necessary repairs. After the repair was completed, DEP collaborated with a contractor to monitor the storm drain network and outfall for reductions in E. coli. Monitoring conducted in March 2025 demonstrated a significant improvement, with at least a 90-percent reduction in E. coli levels at storm drain sites downstream from the Hyatt Bethesda and over a 99-percent reduction at the outfall draining that storm drain line, when compared with bacteria counts observed in August 2024. No further sewage was observed at the discharge point. This achievement marks a major success in reducing bacterial discharge into Little Falls Creek and enhancing water quality.

2.D.4 Property Management and Maintenance

The Permit language of the County's MS4 Permit Part IV.D.4, Property Management and Maintenance, is provided as follows:

<< a. Coverage under Maryland's NPDES General Permit for Discharges of Stormwater Associated with Industrial Activity (SW Industrial GP) is typically required at facilities where the following activities are performed: maintenance or storage of vehicles or equipment; storage of fertilizers, pesticides, landscaping materials, hazardous materials, or other materials that could pollute stormwater runoff. The County shall:

i. Ensure that a Notice of Intent (NOI) has been submitted to the Department for each County-owned industrial facility requiring coverage under the SW Industrial GP; and

ii. Submit with the annual report a list of County properties currently covered under the industrial stormwater permit.

b. The County shall develop, implement, and maintain a good housekeeping plan (GHP) for County-owned properties not required to be covered under Maryland's SW Industrial GP where the activities listed in PART IV.D.4.a are performed. The GHP shall be submitted to the Department by the County in its third year annual report and implemented thereafter. A standard GHP may be developed for all County-owned property or separate GHPs may be developed for properties with similar use (e.g., recreation and parks properties, school properties). The GHP shall include, but not be limited to:

i. A description of property management activities;

ii. A map of the locations of properties covered by the GHP;

iii. A list of potential pollutants and their sources that result from facility activities;

iv. Written procedures designed to reduce the potential for stormwater pollution from property activities, including illicit discharges, dumping, and spills;

v. Written procedures for annually assessing County properties in order to prevent the discharge of pollutants, spills, and leaks into its municipal separate storm sewer system;

vi. Written procedures for performing stormwater conveyance system inspections for removing debris that may cause clogging, backups, and flooding; and

vii. Annual training for all appropriate County staff and contractors regarding best practices for preventing, reducing, and eliminating the discharge of pollutants during property activities.

c. The County shall continue to implement a program to reduce pollutants associated with the maintenance of County-owned properties including, but not limited to, local roads and parks. The maintenance program shall include the following activities where applicable:

i. Street sweeping in the amount identified in Appendix B and annually updated thereafter in accordance with PART IV.E.6;

ii. Inlet and conveyance system inspection and cleaning in the amount identified in Appendix B and annually updated thereafter in accordance with PART IV.E.6; and

iii. Reducing the use of pesticides, herbicides, fertilizers, and other pollutants associated with vegetation management. This can include, but is not limited to:

- Developing and implementing an Integrated Pest Management Plan according to EPA guidelines;
- Custom fertilizer property management plans based on soil testing;
- Targeted application or "spot application" of pesticides;
- Alternative and organic fertilizers;
- Manual weed removal, mowing, and trimming;
- Annual training and applicator certification and licensing as required by Maryland Department of Agriculture to ensure accurate application of chemicals according to manufacturer's recommendations;
- Subcontracting to a certified pest control applicator licensed business for some or all of properties;
- Piloting biological pest control programs; and
- Establishing "no mow" areas.

d. The County shall reduce the use of winter weather deicing and anti-icing materials, without compromising public safety, by developing a County Salt Management Plan (SMP) to be submitted to the Department in its third year annual report and implemented thereafter. The SMP shall be based on the guidance provided on best road salt management practices described in the Maryland Department of Transportation, State Highway Administration's Maryland Statewide Salt Management Plan, developed and updated annually as required by the Maryland Code, Transportation §8-602.1. The County's SMP shall include, but not be limited to:

i. A plan for evaluation of new equipment and methods, and other strategies for continual program improvement;

ii. Training and outreach:

- Creating a local "Salt Academy" that annually provides County winter weather operator personnel and contractors with the latest training in deicer and anti-icer management, or the participation of County personnel and contractors in a "Salt Academy" administered by another MS4 permittee or State agency; and
- Developing and distributing best salt management practices outreach for educating residents within the County.

iii. Tracking and reporting:

- Starting with the fourth year annual report, during storm events where deicing or anti-icing materials are applied to County roads, track and record the amount of materials used, and snowfall in inches per event, if applicable; and
- Report the deicing or anti-icing application by event or date, and the monthly and annual pounds used per lane mile per inch of snow.

e. The County shall evaluate current litter control problems associated with discharges into, through, or from portions of its MS4 that are not already addressed under the TMDL implementation plan for trash (litter and floatables) (see Appendix A). Additionally, the County shall continue to remove from or prevent from entering its storm drain system 225 tons of litter and debris in the first year of permit issuance or as updated annually thereafter in accordance with PART IV.E.6.

f. The County shall report annually on the changes in its Property Management and Maintenance programs and the overall pollutant reductions resulting from implementation of the components of the programs listed in this section. >>

2.D.4.a Industrial Stormwater Permit

The County has 11 facilities covered under the General Permit for Discharges of Stormwater Associated with Industrial Activity (SW Industrial GP), MCPS has six facilities, and the Town of Poolesville has 1 facility. Table 2.D-9 lists the County, MCPS, and Town of Poolesville facilities.

MDE accepted NOIs for these facilities in August 2024 for coverage until January 31, 2028.

2.D.4.b Good Housekeeping Plan

The Permit requires the County to develop, implement, and maintain a good housekeeping plan (GHP) for County-owned properties that meet the following criteria: (1) is not required to be covered under the SW Industrial GP and (2) performs activities listed in Part IV.D.4.a of the 2021 Permit (that is, "maintenance or storage of vehicles or equipment; storage of fertilizers, pesticides, landscaping materials, hazardous materials, or other materials that could pollute stormwater runoff"). The County collaborated with other MS4 jurisdictions and MDE on developing the GHP template and identifying County-owned properties that require a GHP. Site assessments were conducted for over 500 County facilities to determine if a GHP is needed. The GHP was submitted in December 2024 and implemented thereafter. The GHP facility list will be reviewed annually and updated as needed.

Table 2.D-9. County and Co-permittee Facilities Covered under the Industrial Stormwater Permit

County or Co-permittee	Lead Agency	Facility Name	Facility Type (Category)	State Permit Number
County	DGS	Equipment Maintenance and Transit Operation Center	Transportation (viii)	20SW0277
County	DGS	Kensington Small Transit Shop	Transportation (viii)	20SW2311
County	DGS	Seven Locks Automotive Equipment Section and Bethesda Depot	Transportation (viii)	20SW0265
County	DGS	Brooksville Maintenance Facility Transit Shop and Silver Spring Depot	Transportation (viii)	20SW0278
County	MCDOT	Colesville Depot	Transportation (viii)	20SW0267
County	MCDOT	Poolesville Depot	Transportation (viii)	20SW0268
County	MCDOT	Damascus Depot	Transportation (viii)	20SW0269
County	MCDOT	Gaithersburg Depot	Transportation (viii)	20SW2487
County	DEP	Shady Grove Processing Facility	Recycling/Salvage (vi)	20SW0262
County	DEP	Gude Landfill	Landfills (v)	20SW0263A
County	DEP	Oaks Landfill	Landfills (v)	20SW0264
MCPS	DFM	Randolph Depot	Transportation (viii)	20SW0522
MCPS	DFM	Shady Grove Depot	Transportation (viii)	20SW0523A
MCPS	DFM	Bethesda Depot	Transportation (viii)	20SW0524
MCPS	DFM	Clarksburg Depot	Transportation (viii)	20SW0525
MCPS	DFM	West Farm Depot	Transportation (viii)	20SW1258
MCPS	DFM	Central Facilities Maintenance Depot	Transportation (viii)	20SW3325
Town of Poolesville	WWTP	Poolesville WWTP	Treatment Works (ix)	20SW1790

DFM = Montgomery County Division of Facility Management

2.D.4.c Maintenance Program of County Properties

The Permit requires the County to reduce pollutants associated with County properties by implementing a maintenance program that includes the following: sweeping streets; cleaning inlets; reducing the use of pesticides, herbicides, fertilizers, and other pollutants associated with roadway vegetation management; and controlling the overuse of winter-weather deicing materials. This section describes pollutant reduction methodologies related to the County's ongoing maintenance programs. The overall goal of these activities is to reduce the amount of trash and sediment from entering streams and waterways, improve aesthetics, and aid in meeting Maryland environmental goals.

2.D.4.d Street-sweeping Program

DEP administers an arterial street-sweeping program. Arterial routes are larger roads with more commercial activity, traffic, and observed trash. The arterial routes are swept at night when traffic volumes are low to reduce traffic impacts, promote safety, avoid parked cars, and reduce energy consumption. The sweeping is regularly inspected to promote consistent quality. In FY25, the County continued to sweep one cycle monthly, except for spring and fall, when a cycle was swept every 1 to 2 weeks at 335.2 lane miles per cycle.

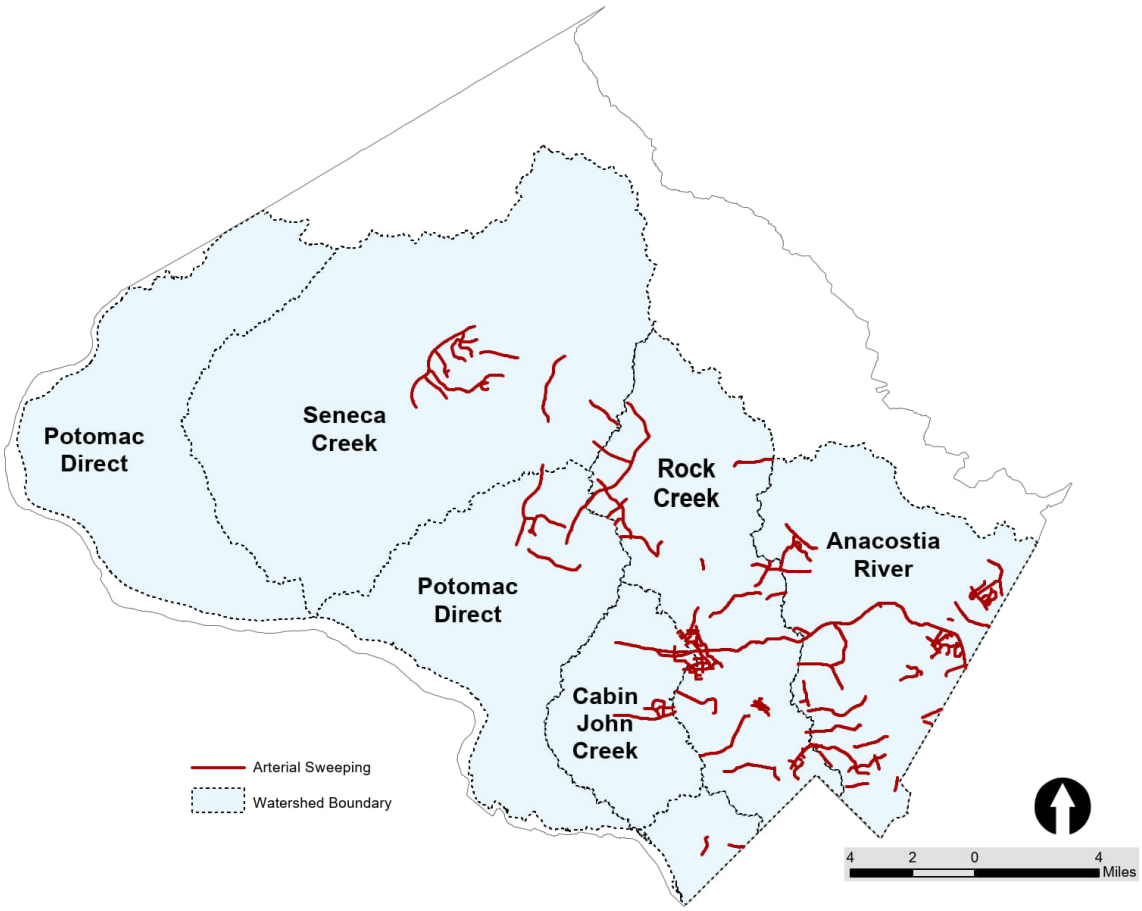
In FY25, a total of 327.64 tons of debris and trash were collected from arterial routes during 17 sweeping cycles. Figure 2.D-2 shows the arterial routes swept in FY25. Because of unusually severe weather conditions, arterial sweeping was not conducted in January 2025. There were multiple snowstorms (January 3, 5, 10, and 19, 2025) along with long periods of extremely cold weather. During very cold weather, freeze-thaw cycles and accumulated ice and snow in the gutters make large-scale sweeping impractical. Freeze-thaw cycles also create new road hazards that require MCDOT's attention. There were concerns about sweeping operations interfering with chemical treatments and snow removal operations. MCDOT applies a salt brine to the roads when snow is predicted and continues treating the roads throughout and after a snow event. In January 2025, MCDOT responded to winter storms most of the month. DEP consults with MCDOT throughout winter storm mobilizations to coordinate operations and confirm that sweeping activities do not conflict with road work or create additional safety hazards.

Several factors allowed MCDOT to sweep salt from the roadways in January, even though DEP was unable to perform the regular arterial sweeping cycle.

- MCDOT has different equipment available for salt sweeping, including loaders and skid loaders with brooms. This allowed them to sweep salt during periods when regular sweeping trucks would have been ineffective because of snow and ice accumulation.
- MCDOT was able to work during brief periods between storms when they could target locations with the largest potential for salt recovery. This included spot sweeping large salt accumulations in the roadway without sweeping entire roads and gutters.
- MCDOT personnel can close roads for maintenance, but DEP does not close roads for arterial sweeping. The hundreds of miles of roadway in an arterial cycle make closures impractical for the highly trafficked arterial routes. There were also safety concerns with street sweepers operating on the roadways at nighttime with ice and snow refreezing as temperatures fell. Sweeping during the daytime under these conditions was also questionable because of conflicts with ordinary highway traffic and hazardous driving conditions.

Ultimately, MCDOT was able to opportunistically sweep targeted areas using creative tactics unavailable to the arterial sweeping program. This allowed them to collect large amounts of salt when little or no progress could be made sweeping the arterial routes.

Figure 2.D-3. Montgomery County Arterial Street-sweeping Routes during Fiscal Year 2025



2.D.4.e Inlet and Conveyance System Inspection and Cleaning

MCDOT's inlet cleaning program includes removing materials from clogged inlets, storm drains, drainage ditches, outfalls, and adjacent drainage areas. This is performed by using a vacuum truck, excavators, and manual labor. Material removed via vacuum truck is disposed of at the Oaks Landfill Leachate Pre-treatment Facility. Other organic and inorganic materials are disposed of at the Shady Grove Transfer Station.

During FY25, MCDOT used a pump truck to remove predominantly organic materials from storm water inlets. This totaled 53.28 tons of material deposited at the Oaks Landfill Leachate Pre-treatment Facility. The inlets are located in Bethesda, Colesville, and Silver Spring. MCDOT's storm water maintenance program maintains thousands of miles of drainage ditches as part of the storm water conveyance system. The drainage ditches normally flow stormwater directly into inlets, basins, or outfalls before entering streams and rivers. Each year, MCDOT receives numerous service requests of clogged and silted

drainage ditches and swales. In FY25, MCDOT removed 9,253 tons of silt, dirt from eroded areas, and other organic materials.

2.D.4.f Pollutants Associated with Vegetation Management

Montgomery Weed Control, Inc. conducts the County's state required roadside weed spraying program for noxious weeds. The County has an integrated pest management plan, which includes specialized spray equipment and targeted application that achieves cost efficient control using minimum herbicides. Operational BMPs are always followed, and all personnel employed by Montgomery Weed Control, Inc. are registered with the County as pesticide applicators and trained in compliance with the state Pesticide Applicator's Law. During FY25, the County applied 4.49 gallons of clopyralid and 7.18 gallons of glyphosate. Other than for noxious weed control, the County uses no other pesticides and no fertilizers for roadside vegetation management.

2.D.4.g Salt Management Plan

MCDOT manages approximately 5,400 lane miles of roads as part of its winter operations program, including salt management. Since 2009, MCDOT has continued to improve its salt management with practices and procedures adapted from the Snow College and Maryland Department of Transportation (MDOT) State Highway Administration's (SHA's) Salt Management Plan (SMP) (MDOT n.d.). In accordance with the Permit, MCDOT worked with DEP to develop a SMP that obligates the County to reduce the use of winter-weather deicing and anti-icing materials without compromising public safety. The plan is based on the guidance provided on best road salt management practices described in the MDOT SHA SMP (MDOT n.d.), which is developed and updated annually as required by the Maryland Code, Transportation Section 8-602.1. This includes best practices for snow removal, salt application, annual training of all personnel, and plan improvements. The plan was submitted to MDE in December 2024.

DEP received comments from MDE on its SMP in Spring 2025 and met with MDE in May to review the feedback and recommendations. In response, DEP will submit an updated SMP in December 2026, which will incorporate planned programmatic expansions and enhanced public outreach strategies.

In FY25, the County encountered seven winter events that consisted of a mix variety of snow, ice, freezing rain, and very low temperatures. Because of the type of winter events, MCDOT did not pretreat roads because of the onset of rain or low freezing temperatures, which renders the salt brine ineffective and is thus a waste of materials. MCDOT still considers salt brine as an important component of winter operations for anti-icing of primary roads and continues to update its equipment and training.

MCDOT's deicing application with traditional sodium chloride salt was higher in FY25 because of the type of storms, which included two winter events that lasted for several days, included snowpack, and required multiple treatments of the roads during those events. This significantly increased the total amount of salt necessary to maintain safe roads with the application of 43,458 tons of sodium chloride for the deicing of roads when compared to 26,461 tons applied in FY24. The County continues to experience a mix of precipitation events. These types of events change the weather and road conditions back and forth between snow, ice, and rain, which requires multiple salt treatments to maintain safe roads. As soon as roads are treated, the weather changes to rain and back to ice over a 48-to-72-hour period, increasing the number of required applications per event. During two of the larger events, MCDOT could not transition from the primary roads to the residential roads until much later than normal. This resulted in snowpacked roads that froze over and required multiple treatments as the snowpack was being worked with plows. This also resulted in a large number of service requests from community members for roads to be retreated.

Despite a very challenging FY25 snow season, MCDOT continues to make every effort to reduce the use of salt in its winter operations program. In addition to the training and use of salt brine to reduce salt use, MCDOT recognizes that the County has different climate zones. With the use of snow patrols and its Road Weather Information Systems (RWIS), MCDOT is able to determine the most essential times to start its treatments in different parts of the County and avoid applying salt at locations where it is not warranted. MCDOT inspects its roads during and after each event and promptly schedules the cleaning of any roads where salt spills, or when overapplications are apparent. This is supported by standby vacuum sweepers and other power sweepers to remove salt spills and reduce the amount of salt that enters the storm drain systems. Table 2.D-10 shows the amount, in FY25, of salt by date. Table 2.D-11 shows the monthly amount, in FY25, of salt application per lane mile per inch of snow. The County does not have the amount of brine application by date or by month; however, Table 2.D-12 reports the annual amount, in FY25, of salt and brine application per lane mile per inch of snow.

Table 2.D-10. Fiscal Year 2025 Salt Application by Date

Date	Pounds Per Storm
December 24, 2024	5,424,000
January 3, 2025	4,854,000
January 5 to 11, 2025	40,187,500
January 19 to 24, 2025	18,850,000
February 5 to 8, 2025	2,480,000
February 10 to 12, 2025	14,940,500
February 14 to 18, 2025	80,000
Total	**86,916,000**

Table 2.D-11. Fiscal Year 2025 Salt Application by Month

Month	Pounds	Lane Mile	Pounds Per Lane Mile	Inch(es) of Snow	Pounds per Lane Mile Per Inch(es) of Snow
December 2024	5,424,000	5,440	997	1	1,662
January 2025	4,854,000	16,320	11,745	11.5	1,021
February 2025	40,187,500	16,320	3,235	6.5	498

Table 2.D-12. Fiscal Year 2025 Annual Salt and Brine Application

Type	Amount	Lane Mile	Per Lane Mile	Inch(es) of Snow	Per Lane Mile Per Inch(es) of Snow
Salt (Pounds)	86,916,000	38,080	2,282	19	120
Brine (Gallons)	192,000	38,080	5	19	0.27

2.D.4.h Litter Control Evaluation

The Permit requires the County to evaluate current trash and litter control efforts; develop strategies to reduce trash, floatables, and debris in its watersheds that are not already addressed under the Anacostia Trash TMDL; and provide public education to aid these efforts (refer to Section 2.D.5, Public Outreach). The County implements several programs throughout the County to reduce trash and litter on our land and in the streams. These programs and efforts conducted by the County and described in this section of the report provide information on the trash and litter reduction in areas outside the Anacostia Watershed. The County uses the following two categories of programming to remove litter from our waterways: direct litter removal and litter reduction programs.

2.D.4.i Direct Litter Removal

Direct litter removal removes litter and debris from streets, sidewalks, and communities before it enters the storm drain or ends up in County streams; this removal includes similar programs that address the Anacostia Trash TMDL found in Section 2.D.4.c of this report.

DEP and MCDOT programs that remove trash include arterial street sweeping, inlet conveyance cleaning, and roadside litter cleanup. DEP and MCDOT support various programs that offer volunteers an opportunity to remove trash and litter from their communities. DEP provides cleanup supplies to volunteers for community cleanup events. There are also independent cleanup efforts, such as the Stream Stewards program, that members of the community report to DEP. FY25 began cleanup events sponsored by the Clean Water Montgomery grant program. MCDOT's Adopt-A-Road Program supplies community groups with equipment and recognition in exchange for their voluntary services of picking up trash and litter along roadways. Volunteers are asked to hold two cleanups a year along their designated road.

2.D.4.j Litter Reduction Programs

Litter reduction programs target reducing the source of litter by combining the enforcement of County laws with public outreach and education. These efforts are intended to change residents and businesses behavior.

The County has several different agencies that enforce solid waste laws that prohibit littering and dumping of trash. The County Department of Housing and Community Affairs (DHCA) Enforcement Division investigates and enforces violations of litter on private property as part of their Clean and Lien Program. DEP has an Illegal Dumping Enforcement Program where resident complaints concerning illegal dumping are investigated and enforcement actions taken. The DEP Recycling and Resource Management Division manages the education and enforcement of the County's solid waste laws and recycling regulations for SFRs, multi-family properties and businesses, organizations, and local, state, and federal government facilities, as they are all required to recycle and reduce waste and aim for Zero Waste.

The County has also passed several pieces of legislation that specifically target the use of certain plastic products. These bills include a carryout bag tax of 5 cents for each disposable bag provided at the point of sale, a ban on the use and sale of all number 6 polystyrene food service ware and packaging peanuts, and a law requiring that restaurants and food service businesses provide straws to dine-in customers only upon request and be reusable or made of marine degradable or home compostable materials. Plastic straws must always be made available upon request to comply with disability rights laws. In early 2025, the County Council passed an update to the carryout bag tax. This update, which begins on

January 1, 2026, will ban the use of plastic carryout bags and increase the tax to 10 cents on paper carryout bags.

The County promotes recycling and litter reduction through a range of outreach and education efforts, including virtual and in-person trainings, social media, community events, volunteer programs, and printed educational materials. Some campaigns are general, such as the "Reduce, Reuse, and Recycle Right" campaign, which aims to educate residents, multi-family properties and businesses, and organizations on how to reduce waste and recycle properly. Other campaigns are more specific to certain types of materials, such as the Skip the Straw and Switch from number 6 Plastics campaigns, which are focused on straws and number 6 polystyrene food service ware, respectively.

The County promotes volunteer programs and litter reduction education through social media and occasional bus campaigns. Annually, the County holds a holiday campaign, which includes social media, bus advertisements, and events to encourage residents to have more environmentally friendly holiday practices, including using reusable shopping bags. More information about DEP's public education program is available in Section 2.D.5 of this report.

Table 2.D-13 summarizes the County's work towards the required removal and prevention of 225 tons of litter and debris from entering the storm drain system outside the Anacostia Watershed. This table also outlines both the removal and prevention of litter and debris Countywide and from the Anacostia Watershed. Further detail about trash and litter reduction in the Anacostia Watershed is provided in the FY24 Countywide Stormwater TMDL Implementation Plan.

Table 2.D-13. Material Removed or Prevented from Entering Storm Drain System during Fiscal Year 2025

Program	Tons Removed from Outside Anacostia Watershed	Tons Removed from Anacostia Watershed	Total Tons Removed from the County
Adopt-A-Road Program	16.44	2.72	19.15
Arterial Street Sweeping	223.74	103.90	327.64
DHCA Clean and Lien[1]	79.00	Not applicable	79.00
Inlet and Conveyance System Cleaning	42.48	10.80	53.28
Roadside Litter Cleanup (MCDOT)	14.55	3.23	17.78
Trash Trap	Not applicable	0.03	0.03
Volunteer Cleanup Program[2]	3.77	1.23	5.00
Total removed:	**379.97**	**121.91**	**501.89**

[1] This number includes trash removed from the Anacostia Watershed.

[2] DEP supported, independent, and grant cleanups.

2.D.4.k Changes in the Property Management and Maintenance Programs

During FY25, MCDOT piloted a winter street sweeping initiative to address over-salting and remove excess salt following winter storm events. Through this effort, the County successfully removed over 90 tons of material and has since integrated winter sweeping into its standard salt management procedures to help reduce environmental impacts. The County is investigating the expansion of the program to include sensitive areas in the coming years.

2.D.5 Public Education

The Permit language of the County's MS4 Permit Part IV.D.5 Public Education is provided as follows:

> <<The County shall continue to implement a public education and outreach program to reduce stormwater pollution and flooding. Education and outreach efforts may be integrated with other aspects of the County's activities. These efforts are to be documented and summarized in each annual report, with details on resources (e.g., personnel and financial) expended and method of delivery for education and outreach. The County shall implement a public outreach and education campaign that includes, but is not limited to:
>
> a. Maintaining a website with locally relevant stormwater management information and promoting its existence and use;
>
> b. Maintaining a compliance hotline or similar mechanism for public reporting of water quality complaints, including suspected illicit discharges, illegal dumping, spills, and flooding problems;
>
> c. Providing information to inform the general public about the benefits of:
>
> i. Increasing water conservation;
>
> ii. Residential and community stormwater management implementation and facility maintenance;
>
> iii. Proper erosion and sediment control practices;
>
> iv. Removing debris from storm drain inlets to prevent flooding;
>
> v. Increasing proper disposal of household hazardous waste;
>
> vi. Improving lawn care and landscape management (e.g., the proper use of herbicides, pesticides, and fertilizers, ice control and snow removal);
>
> vii. Proper residential car care and washing;
>
> viii. Litter reduction;
>
> ix. Reducing, reusing, and recycling solid waste; and
>
> x. Proper pet waste management.
>
> The County shall conduct a minimum of 130 outreach efforts per year. These efforts may include distributing printed materials such as brochures or newsletters; electronic materials such as website pages mass media such as newspaper articles or public service announcements (radio or television); and conducting targeted workshops on stormwater management for the public.>>

The County maintains a robust public education program to reduce stormwater pollution and continues to operate and expand those program activities. This section provides a summary on the status of the County's MS4 Permit public education efforts. Public education program funding is provided in the NPDES MS4 Geodatabase, Fiscal Analysis Associated Table (MDE 2021; MDE 2025).

2.D.5.a Montgomery County Department of Environmental Protection Website

The Permit requires the County to maintain a website with locally relevant SWM information and promote its existence. The County's Clean Water Montgomery website has several pages dedicated to providing information on watershed restoration, stormwater, RainScapes, stream monitoring, and

WQPC (DEP n.d.[a]). The DEP general website, which includes pages on watershed restoration, sustainability, trash and recycling, and water supply and wastewater, had over 1,419,881 views in FY25 (DEP n.d.[b]). The My Green Montgomery online education portal continued as the news and communication arm of the DEP (My Green Montgomery n.d.).

DEP's social media platforms continued to gain popularity during FY25, and water quality and recycling-focused content was featured on all platforms throughout FY25. DEP's public education programming provided social media posts on Facebook, Instagram, X, YouTube, and Nextdoor.

2.D.5.b Compliance Hotline

The Permit requires the County to maintain a compliance hotline for public reporting of water quality complaints, including suspected illicit discharges, illegal dumping, spills, and flooding problems. The County meets this requirement by maintaining a call center that allows residents to call one number (311) for all concerns in the County, including surface water quality concerns. More information can be found on the 311 homepage (Montgomery County Public Information Office n.d.)

2.D.5.c Public Education and Outreach Program Efforts

The Permit requires that the County conduct a minimum of 130 outreach efforts per year. During FY25, the County conducted 761 outreach efforts. These outreach efforts were provided by DEP, DPS, and MCDOT. Table 2.D-14 summarizes the County's outreach efforts by the subjects listed in Part IV.D.5.c of the Permit, and Table 2.D-15 summarizes the delivery method of those outreach efforts. During FY25, DEP also released 264 social media posts, and Table 2.D-16 summarizes those by subject.

Table 2.D-14. Public Outreach Efforts during Fiscal Year 2025

Public Education Topics	MS4 Permit Section	Number of Efforts
General water quality and watershed restoration	Part IV.D.5.c	101
Residential and community SWM implementation and facility maintenance	Part IV.D.5.c.ii	65
Improving lawn care and landscape management, including winter salt education	Part IV.D.5.c.vi	15
Litter reduction	Part IV.D.5.c.viii	13
Reducing, reusing, and recycling solid waste	Part IV.D.5.c.ix	387
Other environmental outreach	Not applicable	180
	Total:	**761**

Table 2.D-15. Public Education Delivery Methods during Fiscal Year 2025

Delivery Method	Number of Outreach Efforts
Blog post	8
Compact fluorescent lamp exchange	72
E-newsletter	21
Fairs and festivals	39
Giveaway (for example, reusable bag, plants, or tchotchke)	4
In-person presentation	253
Media Press Event	1
Print Flyer/Brochure/Material	1
Radio and TV	6
School	52
Tabling event	251
Training workshop	1
Video	3
Virtual event	18
Volunteer event	22
Webinar	4
Other	5
Total:	**761**

Table 2.D-16. Social Media Efforts During Fiscal Year 2025

Public Education Topics	MS4 Permit Section	Number of Posts
General water quality and watershed restoration	Part IV.D.5.c	12
Increasing water conservation	Part IV.D.5C.i	26
Residential and community SWM implementation and facility maintenance	Part IV.D.5.c.ii	72
Proper ESC	Part IV.D.5.c.iii	6
Proper disposal of household hazardous waste	Part IV.D.5.c.v	6
Lawn care and landscape management, including winter salt education	Part IV.D.5.c.vi	124
Litter reduction	Part IV.D.5.c.viii	10
Solid waste reduction, reuse, and recycling	Part IV.D.5.c.ix	8
	Total:	**264**

2.E Stormwater Restoration

The language of the County's MS4 Permit Part IV. E, Stormwater Restoration, is provided as follows:

<< In compliance with §402(p)(3)(B)(iii) of the CWA, MS4 permits must require stormwater controls to reduce the discharge of pollutants to the MEP and such other provisions as theDepartment determines appropriate for the control of such pollutants. Additionally, by regulation at 40 CFR §122.44, BMPs and programs implemented pursuant to this permit must be consistent with applicable stormwater WLAs developed under EPA established or approved TMDLs (see list of EPA established or approved TMDLs attached and incorporated as Appendix A). The impervious acre restoration requirements and associated pollutant reductions described below for Montgomery County are consistent with Maryland's Phase III Watershed Implementation Plan (WIP) for the Chesapeake Bay TMDL and 2025 nutrient load targets, and for local TMDL implementation targets described by the County in its TMDL Watershed Implementation Plans.

1. By November 4, 2026, Montgomery County shall commence and complete the restoration of 1,814 impervious acres that have not been treated to the MEP by implementing stormwater BMPs, programmatic initiatives, or alternative control practices in accordance with the 2021 Accounting Guidance.
2. By November 4, 2022, Montgomery County shall complete the stormwater BMPs, programmatic initiatives, or alternative control practices listed in the Year 1 BMP Portfolio provided in Appendix B. Montgomery County may replace individual practices listed in Appendix B with others that meet the requirements of the 2021 Accounting Guidance as long as the total restoration at the end of yearone meets the implementation benchmark schedule in Table 1.

   "Benchmark" as used in this permit is a quantifiable goal or target to be used to assess progress toward the impervious acre restoration requirement or WLAs, such as a numeric goal for stormwater control measure implementation. If a benchmark is not met, the County should take appropriate corrective action to improve progress toward meeting permit objectives. Benchmarks are intended asan adaptive management aid and generally are not considered to be enforceable.
3. Montgomery County may acquire Nutrient Credits for Total Nitrogen (TN), TotalPhosphorus (TP), and Total Suspended Solids (TSS) in accordance with COMAR26.08.11 to meet its impervious acre restoration requirement in PART IV.E.3 of this permit. For acquiring Nutrient Credits in place of impervious acre restoration, an equivalent impervious acre shall be based on reducing 18.08 pounds of TN, 2.23 pounds of TP, and 8,046 pounds of TSS. The maximum allowable credits obtained from trades with wastewater treatment plants shall notexceed 330 equivalent impervious acres restored.
4. Any Nutrient Credits acquired by Montgomery County for meeting the restorationrequirements of this permit shall be maintained and verified in accordance with COMAR 26.08.11 and reported to the Department in annual reports unless they are replaced at a one to one acre ratio by local stormwater management BMPs, programmatic initiatives, or alternative control practices in accordance with the 2021 Accounting Guidance.

5. Montgomery County shall use the annual restoration benchmark schedule provided in Table 1 below to achieve its impervious acre implementation requirement by the end of the permit term.

Metric	Year 1	Year 2	Year 3	Year 4	Year 5
Cumulative Percent Impervious Acre Restoration Completed	20%	40%	60%	75%	100%

6. In each year's annual report, Montgomery County shall:
   a. Submit to the Department a list of BMPs, programmatic initiatives, and alternative control practices to be completed in the following year to worktoward meeting its impervious acre restoration benchmark:
      i. The list of BMPs, programmatic initiatives, or alternative controlpractices shall be submitted in the Year 1 BMP Portfolio format provided in Appendix B; and
      ii. Montgomery County may replace individual practices listed in itsannual BMP Portfolio as long as the total implementation rate at the end of each year meets the annual restoration benchmark schedule in Table 1.
   b. Evaluate progress toward meeting its annual restoration benchmarkaccording to the schedule in Table 1 and adjust the benchmark appropriately based upon:
      i. Actual BMP implementation rates; and
      ii. Anticipated implementation rates and annual restoration benchmark schedule needed in the remaining years of this permit for meeting the final impervious acre restoration requirement by November 4, 2026. >>

2.E.1 2021 Municipal Separate Storm Sewer System Permit Impervious Restoration Goal

The County's MS4 Permit issued on November 5, 2021, requires the County to implement restoration practices in accordance with MDE's 2021 accounting guidance, *Accounting for Stormwater Wasteload Allocations and Impervious Acres Treated* (MDE 2021), to meet the allocated 1,814-IA restoration goal by November 4, 2026. The County has various programs and initiatives to meet the restoration goal.

- **Capital improvement program (CIP) –** The DEP CIP program installs new BMPs, retrofits existing BMPs, and applies alternative practices such as SR. New BMPs installations are typically constructed on public properties (for example, schools) or within public ROWs (Green Streets) in neighborhoods where space is limited. Existing BMPs are upgraded by increasing their capacity to trap and reduce stormwater pollution during storms to provide more water quality treatment. Stream restoration projects are often sited in areas where SWM is already in place or restoration projects are planned. Restoration techniques typically use natural materials such as rock, logs, and native plants to help slow stormwater flow. DEP includes native planting, wetland planting, and native trees where appropriate to maximize restoration benefits (DEP 2021).
- **Outfall stabilization –** MCDOT is responsible for maintaining the County's storm drain system. MCDOT repairs and stabilizes County-owned storm drain outfalls using SR techniques. While some

sites are stabilized in response to public requests, MCDOT often partners with other agencies, such as DEP and M-NCPPC, to repair outfalls on public land.

- **Street trees –** MCDOT is charged with planting and maintaining trees planted in public ROWs. Residents can contact the County's 311 call center to request tree planting and maintenance. Maintenance activities include pruning, tree removal, stump removal, and tree preservation (MCDOT n.d.[a]).
- **RainScapes –**DEP's RainScapes program promotes and implements environmentally friendly landscaping and small-scale ESD projects on residential, institutional, and commercial properties. The program offers technical and financial assistance to encourage property owners to implement eligible RainScapes techniques, such as rain gardens, rain barrels or cisterns, conservation landscaping, pavement removal, or replacement with permeable pavements (DEP n.d.[c]).
- **Tree Montgomery –** Tree Montgomery is a program developed and implemented by DEP to plant large shade trees throughout the County. The program increases canopy cover and helps raise awareness of the benefits of trees. Trees planted under this program are funded by the Tree Canopy Law that was introduced by County Executive Isiah Leggett and passed in 2013 by the County Council (DEP n.d.[d]).
- **Clean Water Montgomery Watershed grants –** Since 2015, DEP has administered a watershed grant program through the CBT. The grant program funds projects that reduce pollutants through community-based restoration practices, as well as projects focused on public engagement through education, outreach, and stewardship (DEP n.d.[e]).
- **Street sweeping –** DEP administers an arterial street sweeping program in the County. The sweeping routes under this program are typically larger roads with more commercial activity and high traffic. The routes are swept once monthly, except for the spring and fall when a cycle is swept every 1 to 2 weeks.
- **Storm drain cleaning –** MCDOT maintains the County's stormwater conveyance system. As a part of their stormwater maintenance program, MCDOT removes material from clogged inlets, storm drains, drainage ditches, and adjacent drainage areas. Material is typically removed by using a vacuum truck or by manual labor. Residents can report drainage concerns or request for maintenance through the County's 311 call center (MCDOT n.d.[b]).

2.E.2 Progress Toward 2021 Municipal Separate Storm Sewer System Permit Impervious Restoration Goal

The County has continued to implement restoration projects since the 2010 restoration goal was met in anticipation of the Permit being reissued with a new restoration goal. All projects completed since the 2010 Permit impervious surface restoration (ISR) requirement was met in December 2018 can be credited towards the 2021 Permit restoration goal. By November 4, 2025, the County had completed restoration of 1,302 of the 1,814 acres restoration goal and report a completion rate of 72 percent for the Year 4 benchmark. The acres include projects carried over from 2018 and all work completed between FY19 and up to FY25. Because of design and permitting challenges, the County was unable to meet the Year 4 benchmark of 75 percent. However, the County is on target to substantially complete projects currently in final design or under construction by November 4, 2026. Table 2.E-1 reports the County's restoration benchmark schedule. Table 2.E-2 provides the implementation by program and BMP type completed through FY25.

Table 2.E-1. Actual Annual Restoration Benchmark Schedule

Metric	Year 1 (Actual)	Year 2 (Actual)	Year 3 (Actual)	Year 4 (Actual)	Year 5 (Anticipated)
Cumulative percent IA restoration completed	60[1]	63	66	72	100

[1] Year 1's IA restoration credit includes six carryover projects from 2018 and all restoration efforts between FY19 and FY22.

Figure 2.E-1. Existing and Expected Progress of Meeting the 2021 Permit Restoration Goal

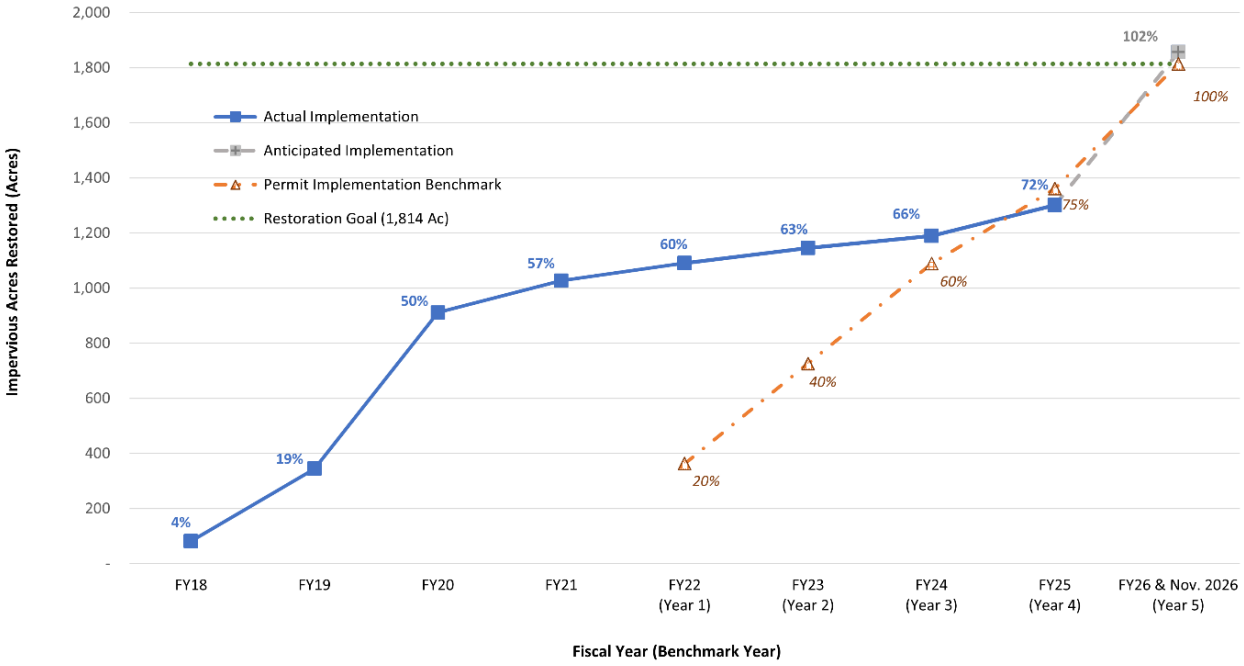


Table 2.E-2. Restoration Implementation Completed through Fiscal Year 2025

Restoration Program Practices and BMPs	Number	IAs Treated
Street Sweeping [1]	Not applicable	46
Storm Drain Vacuuming [1]	Not applicable	6
CWM Watershed Grants – ESD	43	3
RainScapes – ESD	1,117	15
Tree Montgomery and RainScapes – Urban Tree Canopy	14,795	41
Street Trees	14,325	57
Reforestation	2	11
CIP – ESD/Low-impact Development	73	15.5
CIP – Pond Retrofits	13	469
CIP – Outfall Stabilization	21	45
CIP – Sand Filter	1	6

Restoration Program Practices and BMPs	Number	IAs Treated
CIP – Stream Restoration	10	565
CIP – Wetland Restoration	3	22
Total	**30,463**	**1,302**

[1] Street sweeping and storm drain vacuuming is an annual practice that is averaged over the 5-year Permit term. This level of effort will need to continue in Years 3 through 5 to maintain the restoration reported in Year 2.

The County continues to make progress toward meeting the restoration goal in FY25. Table 2.E-6 summarizes projects completed during FY25, Year 4 of the Permit, and Table 2.E-7 summarizes projects to be completed in FY26, Year 5 of the Permit. Details of all completed, under construction, and planned projects can be found in the NPDES MS4 Geodatabase. Structural and ESD BMPs are reported in the BMP and BMPDrainageArea feature classes. Stream restoration and outfall stabilization projects are reported in AltBMPLine feature class. Alternative BMPs with a point location (such as septic system pumping) are reported in AltBMPPoint feature class. Land use change alternative BMPs (such as tree planting) are reported in AltBMPPoly feature class. Supporting documentation for completed SR and outfall stabilization projects are reported in the NarrativeFiles feature table.

Table 2.E-3. Year 1 Completed Projects for the 2021 Permit

BMP Name	BMP Type	Number of BMPs	IAs Treated	Length Restored (feet)/Lane Miles (miles)/Mass Loading (pounds)[1]
Annual BMP – Street sweeping[2]	Vacuum street sweeping	Not applicable	34.61[2]	221.85 miles
Annual BMP – Storm drain cleaning	Storm drain vacuuming	Not applicable	3.90[2]	45,920 pounds
Avenel Golf Course (TPC at Avenel)	Extended detention structure, wet	1	86.10	Not applicable
Bedfordshire	Extended detention structure, wet	1	25.44	Not applicable
B'Nai Israel Regional Pond	Retention pond (wet pond)	1	88.90	Not applicable
Derwood Station (Crabbs Branch SVP)	Extended detention wetland	1	5.26	Not applicable
Derwood Station (Crabbs Branch SVP)	Extended detention wetland	1	4.98	Not applicable
Fallsreach HOA	Extended detention structure, wet	1	25.44	Not applicable
Flints Grove HOA	Extended detention structure, wet	1	31.73	Not applicable
Greencastle Lakes (CA)	Retention pond (wet pond)	1	33.88	Not applicable
Hunters Woods III SWM (Cabin Branch SVP)	Retention pond (wet pond)	1	11.39	Not applicable
Kemp Mill Forest (Ravenswood HOA)	Shallow marsh	1	12.16	Not applicable
Little Falls Library	Bioretention	1	0.80	Not applicable
Montgomery Village (Horizon Run Condominium)	Extended detention structure, wet	1	10.97	Not applicable
Northwood Presbyterian Church	Micro-bioretention	1	0.52	Not applicable
Potomac Chase (Muddy Branch SVU)	Extended detention structure, wet	1	36.65	Not applicable
Quail Valley #2 (Cabin Branch SVP)	Sand filter	1	6.29	Not applicable
The Plantations (Plantations Two CA)	Extended detention structure, wet	1	33.77	Not applicable
Watkins Meadow	Extended detention structure, wet	1	18.55	Not applicable
Sherwood Elementary School	Bio-swale	1	0.23	Not applicable
Sherwood Elementary School	Micro-bioretention	1	0.18	Not applicable
University Towers	ESD	12	4.12	Not applicable

BMP Name	BMP Type	Number of BMPs	IAs Treated	Length Restored (feet)/Lane Miles (miles)/Mass Loading (pounds)[1]
Broad Run SR	Stream restoration	1	217.00	11,785 feet
Fallsreach SR	Stream restoration	1	20.00	1,000 feet
Flints Grove SR	Stream restoration	1	24.00	1,200 feet
Glenstone SR – Greenbriar Branch (Phase 2)	Stream restoration	1	157.30	7,865 feet
Glenstone SR – Sandy Branch (Phase 3)	Stream restoration	1	84.78	4,119 feet
Grosvenor Tributary – Luxmanor SR (M-NCPPC)	Stream restoration	1	12.85	500 feet
Quail Valley 2 SR	Stream restoration	1	3.60	180 feet
Stoneybrook Tributary SR (M-NCPPC)	Stream restoration	1	10.10	2,525 feet
10205 Hatherleigh Drive	Outfall stabilization	1	1.10	55 feet
10617 Stable Lane	Outfall stabilization	1	2.60	130 feet
614 Bennington Drive	Outfall stabilization	1	1.40	70 feet
9100 Charred Oak Drive (Site 2)	Outfall stabilization	1	2.00	100 feet
9124 Charred Oak Drive (Site 1)	Outfall stabilization	1	2.94	147 feet
928 Windmill Lane	Outfall stabilization	1	0.38	19 feet
Berkshire Drive at Aubinoe Farm Drive	Outfall stabilization	1	0.80	40 feet
Glen Road	Outfall stabilization	1	4.00	200 feet
Hampden Street	Outfall stabilization	1	4.00	200 feet
Kemp Mill Road	Outfall stabilization	1	2.00	100 feet
Lockridge Drive	Outfall stabilization	1	2.68	134 feet
Margate Road	Outfall stabilization	1	2.72	136 feet
Whisperwood Lane	Outfall stabilization	1	2.84	142 feet
Woodbine Drive at Beach Drive	Outfall stabilization	1	3.60	180 feet
Tree Montgomery (FY19)	Urban tree canopy	531	1.49	Not applicable

BMP Name	BMP Type	Number of BMPs	IAs Treated	Length Restored (feet)/Lane Miles (miles)/Mass Loading (pounds)[1]
Tree Montgomery (FY20)	Urban tree canopy	986	2.76	Not applicable
Tree Montgomery (FY21)	Urban tree canopy	1,900	5.33	Not applicable
Tree Montgomery (FY22)	Urban tree canopy	1,578	4.42	Not applicable
Street Trees (FY19)	Street tree	1,948	7.79	Not applicable
Street Trees (FY20)	Street tree	1,823	7.29	Not applicable
Street Trees (FY21)	Street tree	1,709	6.84	Not applicable
Street Trees (FY22)	Street tree	1,668	6.67	Not applicable
RainScapes (FY19)	ESD	53	0.24	Not applicable
RainScapes (FY20)	ESD	151	1.94	Not applicable
RainScapes (FY21)	ESD	200	2.00	Not applicable
RainScapes (FY22)	ESD	197	3.94	Not applicable
Clean Water Montgomery Watershed Grants (FY19)	ESD	4	0.21	Not applicable
Clean Water Montgomery Watershed Grants (FY20)	ESD	15	0.90	Not applicable
Clean Water Montgomery Watershed Grants (FY21)	ESD	2	0.22	Not applicable
Clean Water Montgomery Watershed Grants (FY22)	ESD	8	0.05	Not applicable
	Total:	**12,723**	**1,091**	

[1] These include operation and maintenance BMPs and upland BMPs with no associated length, lane miles, or mass loading metric.

[2] Street sweeping and Storm drain cleaning is an annual practice that is averaged over the 5-year Permit term. Credit is subjected to change depending on changes in the level of effort.

CA = community/condo association
SVP = Stream Valley Park
SVU = stream valley unit
TPC = Tournament Players Club

Table 2.E-4. Year 2 Completed Projects for the 2021 Permit

BMP Name	BMP Type	Number of BMPs	IAs Treated	Length Restored (feet)/ Lanes Miles (miles)/ Mass Loading (pounds) [1]
Annual BMP – Street sweeping	Vacuum Street Sweeping	Not applicable	42.11[2]	335.20 miles
Annual BMP – Storm drain cleaning	Storm Drain Vacuuming	Not applicable	5.49[2]	83,240 pounds
Glenmont Forest Green Streets	ESD	52	8.10	Not applicable
Quail Valley I	Retention Pond (Wet Pond)	1	5.28	Not applicable
Glenstone SR – Lake Potomac Dr (Phase 4)	Outfall Stabilization	1	8.70	195 feet
9315 Hollyoak Ct Outfall Repair	Outfall Stabilization	1	2.04	169 feet
Tree Montgomery	Urban Tree Canopy	3,932	9.5	Not applicable
Street Trees	Street Tree	2,265	9.06	Not applicable
RainScapes	ESD	208	2.18	Not applicable
Watershed Grants	ESD	7	0.55	Not applicable
	Total:	**5,927**	**93**	

[1] These include operation and maintenance BMPs and upland BMPs with no associated length, lane miles, or mass loading metric.

[2] Street sweeping is an annual practice that is averaged over the 5-year Permit term. Credit is subjected to change depending on changes in the level of effort.

Table 2.E-5. Year 3 Completed Projects for the 2021 Permit

BMP Name	BMP Type	Number of BMPs	IAs Treated	Length Restored (feet)/ Lane Miles (miles)/ Mass Loading (pounds) [1]
Annual BMP – Street sweeping	Vacuum Street Sweeping	Not applicable	44.61[2]	335.20 miles
Annual BMP – Storm drain cleaning	Storm Drain Vacuuming	Not applicable	5.10	50,910 pounds
Clearspring Manor SR	Stream Restoration	1	18.16	580 feet
Daniel Road	Outfall Stabilization	1	0.02	253 feet
Glenallan Ave	Outfall Stabilization	1	0.02	270 feet
Ancient Oak	Outfall Stabilization	1	0.64	84 feet
Fairfax Road	ESD	1	0.11	Not applicable
Fairfax Road	ESD	1	0.21	Not applicable
Spruell Drive Pavement Removal	Pavement Removal	1	0.17	Not applicable
Tree Montgomery	Urban Tree Canopy	3,784	10.60	Not applicable
Street Trees	Street Tree	2,469	9.88	Not applicable
RainScapes	ESD	154	2.52	Not applicable
Watershed Grants	ESD	6	0.15	Not applicable
	Total:	**6,420**	**92**	

[1] These include operation and maintenance BMPs and upland BMPs with no associated length, lane miles, or mass loading metric.

[2] Street sweeping is an annual practice that is averaged over the 5-year Permit term. Credit is subjected to change depending on changes in the level of effort.

Table 2.E-6. Year 4 Completed Projects for the 2021 Permit

BMP Name	BMP Type	Number of BMPs	IAs Treated	Length Restored (feet)/ Lane Miles (miles)/ Mass Loading (pounds) [1]
Annual BMP – Street sweeping	Vacuum Street Sweeping	Not applicable	45.86[2]	335.20 miles
Annual BMP – Storm drain cleaning	Storm Drain Vacuuming	Not applicable	6.10	Not applicable
Montgomery County Airpark	Extended Detention Structure, Wet	1	60.45	Not applicable
Glenallan Tributary SR	Stream Restoration	1	17.31	1,725
Oaks Landfill Reforestation (Phase 1 – North Berm - Area 5a)	Reforestation	1	4.40	Not applicable
Oaks Landfill Reforestation (Phase 1 – North Berm - Area 5b)	Reforestation	1	6.60	Not applicable
Kerry Court	Outfall Stabilization	1	0.10	83
Vandever Street	Outfall Stabilization	1	0.73	241
Bucknell Drive	ESD	1	0.92	Not applicable
Tree Montgomery	Urban Tree Canopy	2,624	7.35	Not applicable
Street Trees	Street Tree	2,443	9.77	Not applicable
RainScapes	ESD	204	1.89	Not applicable
	Total:	**4,506**	**161**	

[1] These include operation and maintenance BMPs and upland BMPs with no associated length, lane miles, or mass loading metric.

[2] Street sweeping is an annual practice that is averaged over the 5-year Permit term. Credit is subjected to change depending on changes in the level of effort.

Table 2.E-7. Proposed Projects to be Completed in Year 5 of the 2021 Permit

BMP Name	BMP Type	Number of BMPs	IAs Treated	Length Restored (feet)/ Lane Miles (miles)/ Mass Loading (pounds) [1]
Annual BMP – Street sweeping	Vacuum Street Sweeping	Not applicable	45.86[2]	335.20 miles
Annual BMP – Storm drain cleaning	Storm Drain Vacuuming	Not applicable	4.80	Not applicable
Clearspring Manor	Extended Detention Structure, Wet	1	23.73	Not applicable
Germantown Park (Asset 11178)	Extended Detention Structure, Wet	1	5.70	Not applicable
Germantown View	Extended Detention Structure, Wet	1	11.46	Not applicable
Longmeade Crossing	Extended Detention Structure, Wet	1	13.35	Not applicable
Norbeck Manor	Extended Detention Structure, Wet	1	6.80	Not applicable
Plumgar II Regional	Extended Detention Structure, Wet	1	28.46	Not applicable
Watkins Mill	Shallow Wetland	1	8.39	Not applicable
Cypress HOA (PFP)	Step Pool Stormwater Conveyance	1	6.12	Not applicable
Manchester Farm – Asset 10785	Submerged Gravel Wetland	1	4.87	Not applicable
Manchester Farm – Asset 12911	Submerged Gravel Wetland	1	1.04	Not applicable
Manchester Farm – Asset 12913	Submerged Gravel Wetland	1	10.69	Not applicable
Oxford Crossing	Submerged Gravel Wetland	1	12.26	Not applicable
Potomac Manors	Submerged Gravel Wetland	1	15.36	Not applicable
Germantown Park Stream Restoration	Stream Restoration	1	17.30	896
Grosvenor Luxmanor Tributary SR	Stream Restoration	1	38.80	5,648
Old Farm Creek	Stream Restoration	1	13.70	1,193
Desmet Place	Stream Restoration	1	16.03	480
North Creek	Stream Restoration	1	24.75	1,650
Buckhorn Branch	Stream Restoration	1	34.27	2,050

BMP Name	BMP Type	Number of BMPs	IAs Treated	Length Restored (feet)/ Lane Miles (miles)/ Mass Loading (pounds) [1]
Manchester Farm Stream Restoration	Stream Restoration	1	9.37	507
Williamsburg Run	Stream Restoration	1	104.00	4,775
Manchester Farm Outfall Stabilization	Outfall Stabilization	1	15.46	740
Miracle Drive	Outfall Stabilization	1	41.23	1,240
Plum Creek	Outfall Stabilization	1	25.01	525
Plum Creek	Outfall Stabilization	1	11.00	300
Potomac Manors Outfall Stabilization	Outfall Stabilization	1	6.84	300
Tree Montgomery	Urban Tree Canopy	3,000	8.40	Not applicable
Street Trees	Street Tree	1,500	5.90	Not applicable
RainScapes	ESD	To be determined	1.60	Not applicable
	Total:	**4,526**	**574**	

[1] *These include operation and maintenance BMPs and upland BMPs with no associated length, lane miles, or mass loading metric.*

[2] *Street sweeping is an annual practice that is averaged over the 5-year Permit term. Credit is subjected to change depending on changes in the level of effort.*

2.F Countywide Total Maximum Daily Load Stormwater Implementation Plan

The Permit language of the County's MS4 Permit Part IV.F, Countywide TMDL Stormwater Implementation Plan, is provided as follows:

<<1. Where Montgomery County has submitted an implementation plan for a TMDL identified in Appendix A and that plan has yet to be approved, the County shall, within one year of the effective date of this permit, address all outstanding comments needed for the Department's approval of the plan.

2. Within one year of EPA's approval or establishment of a new TMDL, Montgomery County shall submit an implementation plan to the Department for approval. The TMDL implementation plan shall be based on the Department's TMDL analyses, or equivalent and comparable Montgomery County water quality analyses, that includes:

    a. A list of stormwater BMPs, programmatic initiatives, or alternative control practices that will be implemented to reduce pollutants for the TMDL;

    b. A description of the County's analyses and methods, and how they are comparable with the Department's TMDL analyses; and

    c. Final implementation dates and benchmarks for meeting the TMDL's applicable stormwater WLA. Once approved by the Department, any new TMDL implementation plan shall be incorporated in the Countywide TMDL Stormwater Implementation Plan and subject to the annual progress report requirements under PART IV.F.3 of this permit.

3. For all TMDLs and WLAs listed in Appendix A, the County shall annually document, in one Countywide Stormwater TMDL Implementation Plan, updated progress toward meeting these TMDL WLAs. This Countywide Stormwater TMDL Implementation Plan shall include:

    a. A summary of all completed BMPs, programmatic initiatives, alternative control practices, or other actions implemented for each TMDL stormwater WLA;

    b. An analysis and table summary of the net pollutant reductions achieved annually and cumulatively for each TMDL stormwater WLA;

    c. An updated list of proposed BMPs, programmatic initiatives, and alternative control practices, as necessary, to demonstrate adequate progress toward meeting the Department's approved benchmarks and final stormwater WLA implementation dates; and

    d. Updates on the County's efforts to reduce trash, floatables, and debris, and show progress toward achieving the annual trash reduction allocation required by the Anacostia trash TMDL. The updates shall describe the status of trash elimination efforts including resources (e.g., personnel and financial) expended and the effectiveness of all program components including:

        i. Quantifying annual trash reductions using the Department's TMDL analysis or an equivalent and comparable County trash reduction model;

ii. The public education and outreach strategy to initiate or increase residential and commercial recycling rates, improve trash management, and reduce littering; and

iii. An annual evaluation of the local trash reduction strategy including any modifications necessary to improve source reduction and proper disposal.

4. Montgomery County shall provide continual outreach to the public and other stakeholders, including other jurisdictions or agencies holding stormwater WLAs in the same watersheds, regarding its TMDL stormwater implementation plans. Montgomery County shall solicit input from the public, collaborate with stakeholders, and incorporate any relevant comments that can aid in achieving local stormwater WLAs. To allow for public participation, Montgomery County shall:

   a. Maintain a list of interested parties for notification of TMDL development actions;

   b. Provide notice on the County's webpage outlining how the public may obtain information on the development of TMDL stormwater implementation plans and opportunities for comment;

   c. Provide copies of TMDL stormwater implementation plans to interested parties upon request;

   d. Allow a minimum 30-day comment period before finalizing TMDL stormwater implementation plans; and

   e. Document in final TMDL stormwater implementation plans how the County provided public outreach and adequately addressed all relevant comments. >>

2.F.1 Total Maximum Daily Load Stormwater Implementation Plan Updates

The 2021 Permit requires the County to address all outstanding comments on implementation plans for TMDLs identified in Appendix A of the Permit and to submit updated TMDL Implementation Plans to MDE for approval within one year of the Permit's effective date. The following updated draft local TMDL Implementation Plans were provided to MDE on December 23, 2022, with the FY22 MS4 Annual Report:

- *Anacostia River Watershed TMDL Stormwater Wasteload Allocation Implementation Plan for Nutrients, Sediment, and Trash* (DEP 2022a)
- *Cabin John Creek Watershed TMDL Stormwater Wasteload Allocation Implementation Plan for Sediment* (DEP 2022b)
- *Lower Monocacy River Watershed TMDL Stormwater Wasteload Allocation Implementation Plan for Phosphorus and Sediment* (DEP 2022c)
- *Potomac River Montgomery County Watershed TMDL Stormwater Wasteload Allocation Implementation Plan for Sediment* (DEP 2022d)
- *Rock Creek Watershed TMDL Stormwater Wasteload Allocation Implementation Plan for Phosphorus and Sediment* (DEP 2022e)
- *Rocky Gorge Reservoir and Triadelphia Reservoir Watersheds TMDL Stormwater Wasteload Allocation Implementation Plan for Phosphorus and Sediment* (DEP 2022f)

- *Seneca Creek Watershed TMDL Stormwater Wasteload Allocation Implementation Plan for Sediment* (DEP 2022g)

The County received approval for all submitted TMDL Implementation Plans on December 28, 2023, except for the Anacostia River Watershed TMDL Implementation Plan. The updated polychlorinated biphenyl (PCB) TMDL Implementation Plans were submitted to MDE in August 2024. The County is also working on updating TMDL Implementation Plans for bacteria which are being prepared in accordance with *Guidance for Developing Bacteria TMDL (Total Maximum Daily Load) Stormwater Wasteload Allocation (SW-WLA) Watershed Implementation Plans (WIPs)* (MDE 2022a). The County expects the updated plans will be provided to MDE in early 2026.

2.F.2 New Total Maximum Daily Load Stormwater Implementation Plans

The 2021 Permit requires the County to develop and submit an implementation plan to MDE for approval within 1 year of the U.S. Environmental Protection Agency's (EPA's) approval or establishment of a new TMDL. No TMDLs assigning stormwater WLAs to the County's MS4 were approved by the EPA during FY25.

2.F.3 Countywide Stormwater Total Maximum Daily Load Implementation Plan

The County submitted the FY25 Countywide Stormwater TMDL Implementation Plan to MDE in December 2025.

2.F.4 Public and Stakeholder Outreach

Public outreach and stewardship play an important role in improving water quality conditions. The County is committed to continuing and expanding programs and activities to educate and involve the community, with focused efforts to provide outreach to culturally diverse communities. The County will provide notice on the County's website, as well as to interested parties on the final updated local TMDL Implementation Plans once MDE has approved the Plans.

2.G Assessment of Controls

The Permit language of the County's MS4 Permit Part IV.G, Assessment of Controls, is provided as follows:

<<Montgomery County shall conduct BMP effectiveness and watershed assessment monitoring, and polychlorinated biphenyls (PCB) source tracking for assessing progress toward improving local water quality and restoring the Chesapeake Bay. The *2021 MS4 Monitoring Guidelines: BMP Effectiveness and Watershed Assessments*, (hereafter 2021 Monitoring Guidelines) shall be referenced for addressing the technical guidelines and requirements outlined below.

1. BMP Effectiveness Monitoring: By March 5, 2022, or by July 1 of each year, the County shall notify the Department which option it chooses for BMP effectiveness monitoring. The two options are:
    a. The County shall collaborate with the Department in a Pooled Monitoring Advisory Committee administered by the Chesapeake Bay Trust (CBT) for determining monitoring needs and selecting appropriate monitoring studies. To implement the required monitoring, the County shall pay $100,000, or an amount to be proposed by the jurisdiction based on demonstrated past permit monitoring expenditures, annually into a pooled monitoring CBT fund. Enrollment in the program shall be demonstrated through a memorandum of understanding (MOU) between the County CBT by September 1 of each year. The terms of the BMP effectiveness MOU are described in the 2021 Monitoring Guidelines. The County shall remain in the program for the duration of this permit term; or
    b. The County shall continue monitoring the Breewood Tributary or select and submit for the Department's approval a new BMP effectiveness study for monitoring by March 5, 2022. Monitoring activities shall occur where the cumulative effects of watershed restoration activities, performed in compliance with this permit, can be assessed. The minimum criteria for chemical, biological, and physical monitoring are as follows:
        i. Chemical Monitoring:
            - Twelve (12) storm events shall be monitored per year at each monitoring location with at least two occurring per quarter. Quarters shall be based on the calendar year. If exceptional weather patterns (e.g., dry weather periods) or other circumstances (e.g., equipment failures) occur during the reporting year, the County shall provide documentation of such circumstance(s);
            - Discrete samples of stormwater flow shall be collected at the monitoring stations using automated or manual sampling methods;
            - At least three (3) samples determined to be representative of each storm event shall be submitted to a laboratory for analysis according to methods listed under 40 CFR Part 136, and event mean concentrations (EMCs) shall be calculated;
            - Baseflow sampling shall occur quarterly at the mid-point of each season (e.g., February 15 for the first quarter, May 15 for the second quarter);
            - Stormwater flow and baseflow measurements shall be recorded at the outfall and in-stream stations for the following parameters:
                1. Total Suspended Solids (TSS)

2. Bacteria (*E.coli* or *Enterococcus* spp.)
3. Chloride
4. Discharge (flow)
5. Biochemical Oxygen Demand (BOD_5) or Total Organic Carbon (TOC)
6. Orthophosphate
7. Total Nitrogen (TN)
8. Nitrate + Nitrite
9. Total Ammonia (sewer signal)
10. Total Phosphorus (TP)

- Continuous measurements shall be recorded for the parameters listed below at the in-stream monitoring station or other practical location based on the approved study design:

  1. Temperature
  2. pH
  3. Discharge (flow)
  4. Turbidity
  5. Conductivity

- Data collected from stormwater, baseflow, and continuous monitoring shall be used to estimate annual and seasonal pollutant loads and reductions, and for the calibration of watershed assessment models; and

- If the County elects to continue monitoring the Breewood Tributary, or selects a new BMP effectiveness study for monitoring, the County shall submit a revised sampling plan for approval to address the new monitoring parameters provided above with the first annual report. An approved sampling plan under a prior MS4 permit for the County shall continue until the Department approves a new sampling plan proposed under this permit.

i. Biological Monitoring:
   - Benthic macroinvertebrate samples shall be gathered each spring between the outfall and in-stream stations or other practical locations based on a Department approved study design; and
   - The County shall use the Maryland Biological Stream Survey (MBSS) sampling protocols for biological and stream habitat assessment.

ii. Physical Monitoring
   - A geomorphologic stream assessment shall be conducted between the outfall and in-stream monitoring locations or in a reasonable area based on the approved monitoring design. This assessment shall include annual comparison of permanently monumented stream channel cross-sections and the stream profile; and
   - A hydrologic and/or hydraulic model shall be used (e.g., TR-20, HEC-2, HEC-RAS, HSPF, SWMM) in the fourth year of the permit to analyze the effects of rainfall; discharge rates; stage; and, if necessary, continuous flow on channel geometry.

iii. Annual Data Submittal: The County shall describe in detail its monitoring activities for the previous year and include the following:
- EMCs submitted on the Department's long-term monitoring MS4 Geodatabase as specified in PART V below;
- Chemical, biological, and physical monitoring results and a combined analysis for the approved monitoring locations;
- Any available analysis of surrogate relationships with the above monitoring parameters; and
- Any requests and accompanying justifications for proposed modifications to the monitoring program.

2. Watershed Assessment Monitoring: By March 5, 2022, or by July 1 of each year, the County shall notify the Department which option it chooses for watershed assessment monitoring. The County must implement one of the two options as follows:

   a. The County shall collaborate with the Department in a Pooled Monitoring Advisory Committee administered by CBT for determining appropriate watershed assessment monitoring. To implement the required monitoring, the County shall pay up to $197,968 annually into a pooled monitoring CBT fund. The final cost will be dictated by the chosen proposal. Enrollment in the program shall be demonstrated through an MOU between the County and CBT to be signed by September 1 of each year. The terms of the Watershed Assessment Monitoring MOU are described in the 2021 Monitoring Guidelines. The County shall remain in the program for the duration of this permit term; or

   b. The County shall submit a comprehensive plan for watershed assessment and trend monitoring by March 5, 2023 related to stream biology and habitat, bacteria, and chlorides and commence monitoring upon the Department's approval. The plan shall follow the 2021 Monitoring Guidelines and include:

      i. Biological and habitat assessment monitoring at randomly selected stream sites using MBSS protocols;

      ii. Bacteria (i.e., *E.coli*, Enterococcus spp., or fecal coliform) monitoring; and

      iii. Chloride assessments at two locations.

3. PCB Source Tracking: Within one year of permit issuance, Montgomery County shall develop a PCB source tracking monitoring plan for all applicable TMDL WLAs where watershed reductions are required to meet water quality standards. Montgomery County shall submit results and provide updates annually on the monitoring efforts.>>

The 2021 Permit requires the County to notify MDE on a selected option for BMP effectiveness and watershed assessment monitoring. A letter to Lee Currey, director of MDE's Science Services Administration, informed MDE on March 4, 2022, that the County will continue to monitor the Breewood Tributary through the end of CY22 and then will enter into a pooled monitoring program with CBT on July 1, 2023. The letter also stated that the County will conduct the required watershed assessment and trend monitoring. MDE approved this plan in their July 22, 2022, letter.

2.G.1 Best Management Practice Effectiveness Monitoring

The County concluded Breewood Tributary monitoring at the end of CY22 and entered into the Pooled Monitoring Advisory Committee administered by the CBT on October 13, 2023.

2.G.2 Watershed Assessment Monitoring

The County is responsible for fulfilling the 2021 MS4 Permit watershed assessment and trend monitoring requirements. The County provided MDE with a comprehensive plan for watershed assessment and trend monitoring in February 2023. DEP addressed MDE's comments and submitted a revised plan on December 21, 2023. The plan was approved by MDE on January 4, 2024. During CY24, the County began chloride monitoring at two sites, engaged contractual support to perform bacteria monitoring in four watersheds, and continued Countywide biological and habitat monitoring. After the monitoring plan was approved, MDE provided additional comments that included expanded data collection criteria. While the County has incorporated these expanded requirements into its monitoring efforts in FY25, the data gap created by the absence of these parameters in prior years cannot be retroactively addressed.

2.G.2.a Biological and Habitat Assessment Monitoring

In FY25, DEP continued to monitor benthic macroinvertebrates across County watersheds. FY25 data collection represents the fourth year of the fifth round of monitoring. Samples will be subsampled in accordance with Maryland Biological Stream Survey (MBSS) laboratory protocols and will be identified by benthic taxonomists with the appropriate Society of Freshwater Science certifications over the next several months. Data collected during CY24 will be provided with FY26 reporting, and CY25 data will be provided with FY27 reporting. Monitoring data from CY22 and CY23 are reported with this report (FY25) as Microsoft Excel documents in the NarrativeFiles feature table within the geodatabase. The Excel spreadsheets include biological, habitat, and water quality data collected during the spring and summer MBSS index periods for their respective years. DEP conducted benthic macroinvertebrate sampling at randomly selected sites across eight-digit watersheds within the County, as follows:

- In 2022, DEP sampled 43 sites. The following 12-digit watersheds were not sampled:
    1. Bennett Creek (021605020225): Inaccessible
    2. Little Seneca Creek–Bucklodge Branch (021402080858): Dry
    3. Edwards Ferry Tributaries (021402020849): Access denied
- In 2023, DEP sampled 44 sites. The following 12-digit watersheds were not sampled:
    1. Rock Run (021402020845): Dry
    2. Upper Dry Seneca Creek: Dry

Fish sampling was conducted at all sites with drainage areas greater than 0.5 square mile (that is, 23 sites in 2022 and 26 sites in 2023 listed in Table 2.G-1). Data were compiled in accordance with the Statewide MS4 Biological Database Data Guide and fulfilled the County's MS4 monitoring requirements for both years.

Table 2.G-1. Number of Sites Sampled per 8-Digit Watershed during Spring 2022 and Spring 2023

Maryland 8-Digit Watershed Code	8-Digit Watershed Name	Sites Sampled (2022)	Sites Sampled (2023)
2131107	Rocky Gorge Dam	5	5
2131108	Brighton Dam	2	2
2140202	Potomac River MO County	8	9
2140205	Anacostia River	7	7
2140206	Rock Creek	5	5
2140207	Cabin John Creek	1	1
2140208	Seneca Creek	12	12
2140302	Lower Monocacy River	3	3

2.G.2.b Bacteria Monitoring

During FY25, the County implemented their bacteria monitoring plan to sample the identified sites in the four TMDL watersheds (Anacostia, Cabin John Creek, Lower Monocacy, and Rock Creek). Sampling began in September of FY25, and bacteria monitoring data from FY25 are reported as Excel documents in the NarrativeFiles feature table within the geodatabase.

2.G.2.c Chloride Assessments

During FY25, County staff maintained two continuous conductivity loggers in the Watt's Branch Watershed as described in the County's approved monitoring plan. County staff visited each logger approximately every 6 weeks to download data and confirm that loggers were secure and functioning. To maintain consistency with biological and habitat assessment monitoring data, CY24 conductivity data will be reported in FY26, and CY25 conductivity data will be reported with the FY27 annual report.

2.G.3 Polychlorinated Biphenyl Source Tracking

The MS4 Permit requires submittal within 1 year of Permit issuance (or by November 5, 2022) of a PCB source tracking monitoring plan for all applicable TMDL WLAs where watershed reductions are required to meet water quality standards. In August 2024, the County submitted the updated TMDL implementation plans for PCB, which was prepared in accordance with *Guidance for Developing Local PCB TMDL (Total Maximum Daily Load) Stormwater Wasteload Allocation (SW-WLA) Watershed Implementation Plans (WIPs)* (MDE 2022b). In accordance with the submitted plan, the County is working with Howard and Anne Arundel Counties to coordinate PCB monitoring efforts.

2.H Program Funding

The Permit language of the County's MS4 Permit Part IV.H, Program Funding, is provided as follows:

> <<1. Annually, a fiscal analysis of the capital, staffing, operation, and maintenance expenditures necessary to comply with all conditions of this permit shall be submitted by Montgomery County as required in PART V below.
>
> 2. Adequate program funding to comply with all conditions of this permit shall be maintained. Lack of funding does not constitute a justification for noncompliance with the terms of this permit.>>

The MS4 Permit requires the County to submit the annual fiscal analysis of the capital, staffing, operation, and maintenance expenditures by providing the expenditures for the reporting period and proposed budget for the upcoming year. This information is provided in database format in the NPDES MS4 Geodatabase, Fiscal Analysis Associated Table (MDE 2021; MDE 2025).

2.H.1 Expenditures and Appropriated Budget

During FY25, reported expenditures associated with all MS4 Permit requirements were $100,871,746 which marked an increase of 26 percent over FY24 MS4 Permit expenditures. The increase in expenditures is due to winter weather in FY25, increased watershed restoration operating and capital expenditures, and increased SWM maintenance costs. Winter-weather activities and expenditures were reduced in FY24, which is a major driver of the FY25 expenditure increases. Watershed restoration operating and capital expenditures will continue to increase as the County works toward accomplishing the ISR goal.

Table 2.H-1 provides the total capital and operating expenditures for the FY25 reporting period. The expenditure data presented in Table 2.H-2 and NPDES MS4 Geodatabase, Fiscal Analysis Associated Table (MDE 2021; MDE 2025), represent the FY25 expenditures for MS4 Permit implementation by DEP, MCDOT, DGS, DPS, DHCA, and MCPS. The following programs and efforts are included:

- Operating and personnel expenditures for SWM, ESC, IDDE, property management, public education, stormwater restoration, TMDL, Assessment of Controls, and DEP administrative and reporting expenditures.
- Capital and personnel expenditures from SWM, property management, stormwater restoration, and TMDL.
- Debt service payment for DEP and MCDOT CIP restoration and outfall projects.

Table 2.H-1. Fiscal Year 2025 Operating and Capital Expenditures

Expenditure Type	Expenditure
Operating[1]	$82,655,708
Capital[2]	$18,216,038
Total expenditures FY25:	**$100,871,746**

[1] Operating expenditures are the same as what is provided in NPDES MS4 Geodatabase, Fiscal Analysis Associated Table, OP_COST field (MDE 2021; MDE 2025).

[2] Capital expenditures are the same as what is provided in NPDES MS4 Geodatabase, Fiscal Analysis Associated Table, CAP_COST field (MDE 2021; MDE 2025).

The funding for the operating and capital budget includes revenue generated from the WQPC, BMP monitoring fee, tree canopy fee, stormwater waiver fee, and carryout bag tax.

The FY26 appropriated budget is provided in Table 2.H-2 and in NPDES MS4 Geodatabase, Fiscal Analysis Associated Table (MDE 2021; MDE 2025). This information represents the appropriated budget in FY26 for MS4 Permit implementation by County DEP, MCDOT, DGS, DPS, and DHCA. The FY26 budget information was gathered for the programs previously listed for the expenditure fiscal analysis.

Table 2.H-2. Fiscal Year 2026 Appropriated Budget

Appropriated Type	Budget
Operating[1]	$61,568,389
Capital[2]	$20,295,870
Total FY26 budget:	**$81,864,259**

Notes:

[1] FY25 appropriated operating budget is the same as what is provided in NPDES MS4 Geodatabase, Fiscal Analysis Associated Table, OP_BUDGET field (MDE 2021; MDE 2025).

[2] FY25 appropriated capital budget is the same as what is provided in NPDES MS4 Geodatabase, Fiscal Analysis Associated Table, CAP_BUDGET field (MDE 2021; MDE 2025).

2.H.2 Financial Assurance Plan

On March 18, 2025, the Montgomery County Council approved the biennial Financial Assurance Plan (FAP). The County provided the FAP to MDE on March 18, 2025, and MDE approved the FAP on May 1, 2025. Maryland law requires Phase I MS4 jurisdictions to project annual and 5-year costs to meet the MS4 Permit requirements. The FAP must demonstrate the jurisdiction has sufficient funding in its current and subsequent FY budgets to meet its estimated costs for the 2-year period immediately following the FAP filing date. MDE MS4 guidance requires the FAP to include annual and projected 5-year costs needed to meet the Permit's ISR goal. The County's FAP demonstrates its commitment to fulfill the requirements of the MS4 Permit ISR requirement.

The expenditures and revenue data provided to MDE in the County's FAP use different assumptions than the information required for this MS4 annual report. While the assumptions are based on the same information, they cannot be directly compared.

3. Program Review, Annual Reporting, and Reapplication

The Permit language of the County's MS4 Permit Part V.C, Reapplication for NPDES Stormwater Discharge Permit, is provided as follows:

<< This permit is effective for no more than five years from the effective date unless administratively continued by the Department. In order to qualify for an administrative continuation of this permit beyond five years, Montgomery County must reapply for NPDES stormwater discharge permit coverage in its fourth year annual report. Failure to reapply for coverage constitutes a violation of this permit and can lead to a lapse of permit coverage and subject any discharges that occur without permit coverage to enforcement action and penalties. All requirements of this permit must be completed within the five-year permit term. An administrative continuance does not extend or modify any of the completion dates as set forth in the permit; the administrative continuance only provides permit coverage to allow County discharges until a new NPDES permit is issued and effective. Once a new NPDES permit is effective the administrative continuance automatically expires.

As part of this application process, the County shall submit to the Department an executive summary of its NPDES stormwater management program that specifically describes how each County watershed has been thoroughly evaluated, and the status of implementing water quality improvement projects and all schedules, benchmarks, and deadlines toward meeting stormwater WLAs. This application shall be used to gauge the effectiveness of the County's NPDES stormwater program and will provide guidance for developing future permit conditions. The application summary shall include:

1. The County's NPDES stormwater program goals;
2. Program summaries for the permit term regarding:
    a. Illicit discharge detection and elimination results;
    b. Impervious Surface and Chesapeake Bay Restoration status including County totals for impervious acres, impervious acres controlled by stormwater management, the current status of water quality improvement projects and acres managed, and documentation of progress toward meeting stormwater WLAs developed under EPA approved TMDLs;
    c. Pollutant load reductions as a result of this permit and an evaluation of whether TMDLs are being achieved; and
    d. Other relevant data and information for describing County programs;
3. Program operation and capital improvement costs for the permit term; and
4. Descriptions of any proposed permit condition changes based on analyses of the successes and failures of the County's efforts to comply with the conditions of this permit.>>

3.A Reapplication for National Pollutant Discharge Elimination System Stormwater Discharge Permit

The current MS4 permit, issued on November 5, 2021, is the fourth iteration of the County's MS4 Permit. The 2021 MS4 Permit included requirements under the following categories: permit administration, legal authority, source identification, management programs, stormwater restoration, Countywide TMDL Stormwater implementation plan, assessment of controls, and program funding. The Permit progression demonstrates the evolving nature of SWM regulations and practices, with each successive Permit incorporating lessons learned and advancements made by the County and MDE.

The County has made considerable progress towards meeting permit requirements since 2021, including the following:

- Achieved over 1,302 acres of ISR since FY21 and on target to achieve the goal of 1,814 acres of ISR by the end of the 5-year permit in 2026
- Achieved over 7,200 acres of ISR since FY02 (first generation MS4 Permit)
- Prevented over 2,300 tons of materials from entering the storm drain system
- Approved over 2,500 SWM plans, including development and redevelopment
- Conducted over 45,000 BMP inspections
- Conducted over 84,000 ESC inspections
- Conducted over 600 outfall screenings
- Implemented outreach to focus on source control through increased awareness and produced behavioral change
- Conducted over 2,200 outreach efforts
- Fulfilled the 2021 MS4 Permit BMP effectiveness and watershed assessment monitoring requirements
- Completed monitoring of Breewood Tributary retrofit projects that provided more than 10 years of data
- Commenced and continued participation in the pooled monitoring program administered by CBT
- Designed and implemented new watershed assessment monitoring that included a cooperative chloride monitoring study of two sites with WSSC and University of Maryland as partners, bacteria monitoring in watersheds with existing TMDLs, and retooling of a nearly 30-year-old Countywide benthic macroinvertebrate monitoring program to improve data collection and meet MDE requirements
- Continued actions to reduce TMDLs in accordance with the MDE-approved TMDL implementation plans
- Published a GHP to address pollution prevention on public properties

- Established a Countywide SMP to optimize winter road salting, reduce environmental impact, and promote 'Salt Wise' public education
- Increased funding for a total of approximately $269 million in operating funds and $57 million in capital funds over the past 4 years

While the County has made significant progress in meeting the requirements of the MS4 Permit, it also faced major implementation challenges during the permit term. Compared to previous years, the issuance of the 2021 MS4 Permit included new requirements rather than an extension of previous requirements, which compressed the compliance timeline and intensified the pressure to implement and complete restoration projects. The COVID-19 pandemic introduced unprecedented logistical disruptions, delayed schedules, and reduced operational capacity across County departments, consultants, contractors, and even MDE. Limited staffing at all levels impacted project timelines from design and permitting through construction. Concurrently with the global pandemic, the County grappled with increased construction costs and inflation, which impacted the budget and necessitated careful resource allocation. Rising construction costs, combined with a shrinking pool of cost-effective IA restoration sites, have made implementation increasingly challenging and increased the cost per IA of restoration. Moreover, the growing inventory of installed BMPs expanded the scope and demands of inspection and maintenance programs. Despite these multifaceted challenges, the County's ability to fulfill its permit obligations underscores its resilience in the face of substantial obstacles.

While the County remains committed to improving water quality and addressing current challenges, it recognizes the need for a more holistic approach to SWM. Beyond meeting regulatory requirements, the County is working to build a robust program management framework that integrates permit compliance with the adoption of innovative best management practices (BMPs). This approach aims to foster long-term sustainability and resilience in SWM, while advancing water quality throughout the County.

The County will continue to fulfill MDE's MS4 Permit requirements for stormwater restoration and TMDLs, while also dedicating time and resources to designing forward-thinking programs that go beyond compliance. However, significant future restoration obligations are expected to increase compliance costs, making it more difficult to implement a comprehensive SWM strategy that supports broader watershed goals.

These goals include not only water quality protection and improvement, but also enhancements to living resources, land cover and land use, racial equity and social justice, and climate resilience. As permit requirements expand, the County anticipates that these challenges will grow—requiring strategic planning, innovation, and sustained investment to ensure continued progress.

3.B Montgomery County's National Pollutant Discharge Elimination System Stormwater Program Goals

In 2024, the County shared a draft of the Watershed Assessment Program goals and objectives with MDE and other stakeholders for input. After incorporating feedback, the County finalized the document in November 2024. The Watershed Assessment Program goals and objectives were developed to establish a framework for conducting both Countywide and individual watershed assessments. The goals align closely with Maryland's NPDES stormwater program objectives, as they address the reduction of various pollutants, compliance with MS4 Permit requirements, adherence to TMDLs, proactive data collection for water quality improvement, protection of special areas, and the establishment of a robust reporting framework. The County developed the following six strategic goals:

- Water quality protection and improvement
- Living resources
- Land cover/land use
- Racial equity social justice
- Climate change mitigation and resilience
- Erosion and flood resilience

The water quality protection and improvement, living resources, and land cover/land goals include objectives relating to restoration and water quality initiatives to meet the watershed-specific restoration goals and water quality standards outlined in the MS4 Permit. Specifically, the Watershed Assessment Program goals and associated objectives provide the planning basis for the County to address NPDES stormwater goals, listed as follows:

- Reduce levels of pollution in streams, groundwater, and drinking water reservoirs, including factors such as nutrients, sediment, bacteria, temperature, salt, trash, and toxics.
  - Meet or exceed impervious surface acreage treatment requirements of the County's NPDES MS4 Permit.
  - Meet or exceed MS4 Permit TMDL requirements for the Chesapeake Bay and local TMDLs.
  - Proactively collect data and information to help address MDE Integrated Report impairments without approved TMDLs or where water is not meeting numerical water quality criteria.
  - Identify opportunities in special protection areas to maintain or improve watershed water quality.
  - Identify areas that would benefit human and environmental health through improved surface and groundwater quantity, quality, potability, and opportunities for water contact.
  - Establish a reporting framework that will be used for annual reporting as required in the County's MS4 Permit.
- Maintain and increase the abundance, diversity, and health of the County's native wildlife and plant life.
  - Increase the diversity of aquatic species and the number of individuals of native aquatic species in targeted streams.

  - Identify areas with populations of rare, threatened, endangered, and locally uncommon aquatic and terrestrial species to protect and restore.
  - Identify streams where biological conditions can be improved.
  - Increase the number of watersheds in good and excellent condition.
  - Identify watersheds to prioritize protection to prevent downgrades in biological condition.
- Maintain and improve land cover/use that supports healthy watershed conditions through land cover/use that supports healthy watershed conditions through conservation, reservation, and other management actions.
  - Identify valuable resource areas sensitive to disturbance to protect and restore.
  - Support County implementation of the No Net Loss of Forest Initiative.
  - Identify areas of tree canopy for protection and planting.
  - Identify existing wetlands for conservation and enhancement, and areas for wetland creation.

3.C Program Summaries for the Permit Term

3.C.1 Illicit Discharge Detection and Elimination

The Permit requires the County to implement an inspection and enforcement program to confirm that all discharges to and from the MS4 system that are not composed entirely of stormwater are either permitted by MDE or eliminated. The Permit requires the following, at a minimum:

- Review all County outfalls to prioritize areas with the greatest potential for polluted discharges. The prioritization process was implemented in FY22.
- Field screen at least 150 outfalls annually.
- Conduct routine surveys of commercial and industrial areas.
- Maintain a program to investigate and address illegal discharges, dumping, and spills.
- Maintain an ordinance that prohibits illicit discharges into the stormwater system.
- Use appropriate enforcement procedures for investigating and eliminating illicit discharges, illegal dumping, and spills.
- Report IDDE activities annually.

3.C.1.a Outfall Screening

The County implements an inspection and enforcement program to confirm that anything other than stormwater that discharges to the MS4 is either permitted or eliminated. The permit requires field screening of at least 150 outfalls annually, with field water chemistry analysis of dry weather discharges according to parameters specified in the permit.

Building on the comprehensive outfall screening approach developed during the previous permit cycle, DEP continued its efforts by targeting a different region of the County each year. The annual rotation focused on commercial and industrial areas, which are more likely to be sources of illicit discharges.

Beginning in FY22, DEP enhanced its outfall selection process by adopting a more iterative approach. The approach was adopted to increase the effectiveness of detecting illicit discharges and pollution. The process includes identifying commercial and industrial areas, determining which outfalls are within the 150-foot stream buffer near these areas, and selecting 150 from the list. In addition to the outfalls within the new region, outfalls in the previous year's region that had previously shown signs of pollution were also prioritized for rescreening. Additional outfalls were then selected based on their proximity to commercial and industrial properties, storm drain inlets, and nearby streams. Starting with the closest outfalls to the stream buffer, the selection radius gradually expanded until at least 150 outfalls were identified. Table 3.C-1 summarizes DEP's IDDE program during the permit term from FY22 to FY25, during which 626 outfalls were assessed across the County. The outfall screenings resulted in nine illicit discharges; of the nine resulting investigations of these discharges, seven problems were identified and resolved.

Table 3.C-1. Summary of Illicit Discharge Detection and Elimination during Permit Term (Fiscal Year 2022 through Fiscal Year 2025)

Outfall Screening Results	Quantity
Outfalls Screened	626
Suspected Illicit Discharges	9
Resulting Investigations	9
Problems Resolved	7

3.C.1.b Routine Pollutant Surveys of Commercial and Industrial Areas

The Permit requires the County to conduct routine surveys of commercial and industrial areas to identify and eliminate pollutant sources, with findings reported annually. Each year, a minimum of 40 commercial and industrial hotspot parcels are selected from a different region of the County, with regions rotating annually. Common issues identified during inspections include water quality concerns, grease buildup, and solid waste accumulation. Informal enforcement actions, such as verbal warnings and follow-up site visits, are used to address identified issues. When necessary, informal enforcement escalates to formal actions, including NOVs, citations, and fines. Table 3.C-2 summarizes DEP's commercial and industrial surveys from FY22 to FY25.

Table 3.C-2. Summary of Stormwater Discharge Enforcement Cases Based on Commercial and Industrial Survey Results (Fiscal Year 2022 through Fiscal Year 2025)

Survey Results	Quantity
Industrial surveys conducted	186
Formal enforcement	86
Industrial surveys resolved	79

3.C.1.c Program to Address Illegal Discharges, Dumping, and Spills

The County has met permit requirements to maintain a program to address and respond to illegal discharges, dumping, and spills. The County maintains a website and a 311 spill response hotline that citizens can use to report environmental concerns. DEP is responsible for investigating and enforcing cleanup of nonemergency fuel, oil, or chemical spills that do not pose an immediate risk to public health or safety.

3.C.1.d Water Quality Investigations and Enforcement

Investigation of water quality issues varies year to year. Since the beginning of the permit, a total of 932 water quality investigations have been conducted. A breakdown of the type and number of formal enforcement actions from FY22 to FY25 is summarized in Table 3.C-3.

Table 3.C-3. Summary of Illicit Discharge Detection and Elimination during Permit Term (Fiscal Year 2022 through Fiscal Year 2025)

Water Quality Investigation Results	Quantity
Water quality investigations	932
Water quality NOVs issued	108
Water quality citations	54
Water quality fines issued	$29,750

3.C.2 Watershed Restoration Summary

The Permit requires the County to implement practices identified in Part III.F, Watershed Assessment, to control stormwater discharges to the MEP. At a minimum, the County will, by the end of the permit term, commence and complete the restoration efforts of 1,814 IAs that have not been treated to the MEP.

3.C.2.a Achieving Previous MS4 Permit Watershed Restoration Goals

The County's second-generation permit issued in 2001 required the County to restore a watershed or combination of watersheds equaling 10 percent of the County's IA not treated to the MEP. In FY11, the County met the 10 percent watershed restoration requirement, restoring 2,146 IAs. The County was issued a third generation permit in 2010, which required the restoration of an additional 20 percent of the County's IA not currently controlled to the MEP. The County achieved the restoration in 2018, restoring 3,790 acres.

3.C.2.b Achieving the 2021 MS4 Permit Watershed Restoration Goal

The County's current (fourth generation) Permit issued in 2021 requires the County to restore an additional 1,814 acres of area not currently controlled to the MEP. The progress to date of the restoration is at 72 percent of the goal and is anticipated to be met by the end of the permit cycle.

Table 3.C-4 provides a summary of restoration achieved during the permit term and includes alternative BMPs such as vacuum street sweeping, outfall stabilization, tree projects, storm drain cleaning, SR, ESD, and pavement removal and CIP projects by type. The credit for the alternative BMPs is based on guidance provided by MDE (MDE 2021b). Annual practices that were used to meet the 2010 and 2021 Permit restoration goals, such as street sweeping, catch basin cleaning, and septic system pump-outs, will be continued in the future to maintain the impervious restoration credit currently achieved.

Table 3.C-4. County Projects and Alternative Best Management Practice Credits Completed as of Fiscal Year 2025 for the 2021 Permit Term

Category[1]	IA Restoration Completed During the Permit Term	Progress Toward Restoration Goal in Acre
Street Sweeping	Not applicable	46
Storm Drain Vacuuming	Not applicable	6
CWM Watershed Grants – ESD	42	3

Category[1]	IA Restoration Completed During the Permit Term	Progress Toward Restoration Goal in Acre
RainScapes – ESD	973	15
Tree Montgomery and Rainscapes – Urban Tree Canopy	12,171	41
Street Trees	11,882	57
CIP – ESD/Low-Impact Development	73	15.5
CIP – Pond Retrofits	12	469
CIP – Outfall Stabilization	19	45
CIP – Sand Filter	1	6
CIP – Stream Restoration	9	565
CIP – Wetland Restoration	3	22
Progress Total:	**25,185**	**1,302**

[1] *Includes a combination of permanent and annual practices*

3.C.3 Progress Towards Meeting Wasteload Allocations and Pollutant Load Reductions

The Permit requires the County to address all outstanding comments on implementation plans for TMDLs identified in Appendix A of the Permit and to submit updated TMDL implementation plans to MDE for approval within 1 year of the Permit's effective date. The County submitted seven updated TMDL implementation plans in FY22 and received approval for all but the Anacostia River Watershed TMDL Implementation Plan. The updated PCB TMDL implementation plans were submitted to MDE in August 2024. The County is also working on updating TMDL implementation plans for bacteria which are being prepared in accordance with *Guidance for Developing Bacteria TMDL (Total Maximum Daily Load) Stormwater Wasteload Allocation (SW-WLA) Watershed Implementation Plans (WIPs)* (MDE 2022a). The County expects the updated plans will be provided to MDE in early 2026.

In FY24 and early FY25, the County submitted additional TMDL plans to MDE. Annually, the County has submitted a Countywide TMDL implementation plan to MDE based on Permit requirements (refer to Table III.J.2). .

The County submitted the FY25 Countywide Stormwater TMDL Implementation Plan to MDE in December 2025. The Countywide TMDL stormwater implementation plan demonstrates the County's progress toward meeting waste load allocations (WLAs) for approved local TMDLs and Chesapeake Bay TMDLs.

In addition to meeting EPA-established or EPA-approved TMDLs, the MS4 Permit pollutant reductions are consistent with Maryland's Phase III Watershed Implementation Plan for the Chesapeake Bay TMDL and 2025 nutrient load targets. The strategies provided in the County's plans are also modeled against the Chesapeake Bay TMDL goals to calculate progress. Nutrient and sediment loads for the Chesapeake Bay TMDL were determined using the Chesapeake Assessment Scenario Tool, which calculates nutrient and sediment loads and reductions calibrated to the Chesapeake Bay Program's Partnership Watershed Model Phase 6.

3.C.4 Stormwater Management

The DEP SWIM Program oversees the triennial inspections of SWM BMPs to identify maintenance needs required for continued BMP performance. DEP performs structural maintenance on BMPs owned by the County, MCPS, and the M-NCPCC, as well as structural and nonstructural maintenance on ESD BMPs located on County property and ROWs. From FY22 to FY25, the number of SWM BMPS under County jurisdiction has grown to over 27,000. The purpose of the SWIM Program is to promote the continued operation of SWM BMPs. DEP issues NOVs if the required maintenance is not performed in a timely manner. The number of SWM BMP triennial inspections, follow-up inspections, and NOVs are summarized in Table 3.C-5.

Table 3.C-5. Stormwater Management Best Management Practice Inspections and Enforcement Completed during Permit Term (Fiscal Year 2022 through Fiscal Year 2025)

Inspection Type	Quantity
SWM BMP Triennial Inspections	15,996
SMW BMP Follow-Up Inspections	29,238
SWM BMP Maintenance NOV	1,984

In July 2010, the County Council enacted Expedited Bill 40-10 (Stormwater Management – Revisions), which was later amended in July 2011 by Expedited Bill 7-11 (Stormwater Management – Revisions). Together, these bills updated the County's SWM law to require management of stormwater runoff through the use of nonstructural BMPs to the MEP for new development and redevelopment projects approved by the County DPS. They also brought the County's SWM law into compliance with the Act and associated state implementing regulations adopted in 2010.

The County's revised SWM law has more stringent requirements than state law for redevelopment sites to protect water quality. Specifically, the Act requires management of the first inch of runoff from 50 percent of the redevelopment site using ESD to the MEP. The County law requires SWM of both water quality volume (the first inch of runoff) and channel protection volume (CPY – the expected runoff from a 1-year 24 hour duration rainfall) from 100 percent of the redevelopment site and requires the use of ESD to the MEP to meet these standards.

In July 2010, when ESD was first required by County Code, the County did not require easements on SFR private property, which would allow the County access to perform inspections of permitted facilities. In 2016, DEP worked with the DPS to require ROE and maintenance agreements for all SWM facilities constructed under all new ESC permits and an agreement was approved by the OCA. DPS began requiring the easements on January 1, 2017.

While ESDs began in 2017, more than 5,800 of existing ESD BMPs on SFR lots where DEP has no legal access were approved before that time. Therefore, the County continues to have thousands of SFR BMPs where DEP cannot perform inspections. The County continues its efforts to fulfill triennial inspections, though access to SFR ESD BMPs remains a hurdle. Since MDE commented on this challenge in FY22, DEP has taken several steps to increase the number of triennial inspections of ESD BMPs on SFR properties, including the following:

- DEP encouraged owners to conduct self-inspection of their ESD BMPs annually, perform maintenance as necessary, and claim WQPC credit for these BMPs.

- DEP sends postcards and notices of information regarding the WQPC credit program to promote self-certification of ESD BMPs on SFR properties.
- To verify the field conditions of BMPs submitted via WQPC credit applications, DEP conducts site visits to approximately 10 percent of the approved applications to verify asset maintenance and conditions reported by SFR property owners.
- The County has partnered with Alliance for the Chesapeake Bay and surrounding jurisdictions to develop a SWIM program for private property owners in the Anacostia Watershed. The program covers RainScapes rebate projects and Clean Water Montgomery grant projects. The County has expanded the cost-share maintenance to property owners with MS4 Permit ESD practices on lots with ROE.
- In FY25, DEP began to perform inspections on properties containing SFR assets with ROE agreements.

3.C.5 Erosion and Sediment Control

On March 29, 2013, the County Council passed Expedited Bill 1-13 (Erosion and Sediment Control – Special Protection Areas – Amendments), which brought local ESC requirements into compliance with the Act and the 2011 Maryland Standards and Specifications for Soil Erosion and Sediment Control. The County legislation mirrors the requirements in state law and regulations, including more stringent stabilization requirements and the establishment of maximum grading unit criteria. Any improvements or changes identified by MDE during their evaluation process have been made. On February 6, 2024, MDE informed the County that its program is in compliance with the ESC program elements stipulated in Part 2.D.2 of the County MS4 Permit.

The County's ESC program includes the following elements:

- Reviewing the grading permit applications for earth disturbance
- Inspecting and enforcing grading and ESC regulations
- Inspecting all ESD treatment practices, structural SWM facilities, and stable stormwater conveyance and capacity
- Conducting compliance investigations
- Reporting earth disturbance exceeding 1 acre

3.C.6 Water Quality Protection Charge

In April 2013, the County Council passed Bill 34-12 (Stormwater Management – WQPC) to bring County law into compliance with a state law enacted by the General Assembly as House Bill 987 mandating the levying of local charges to pay for stormwater remediation in Phase I jurisdictions.

In November 2015, the County Council enacted Expedited Bill 45-15 (Stormwater Management – Water Quality Protection Charge – Curative Legislation) to explicitly designate the WQPC as an excise tax under the County's general taxing authority in response to an adverse court ruling premised on the assumption that the WQPC was intended to function as a fee-for-service.

In January 2018, the County Council enacted Bill 1-18 (Stormwater Management – Water Quality Protection Charge – Appeals) to require that a property owner who wants to appeal the imposition of the WQPC take that appeal to the tax court rather than the board of appeals. This is consistent with Bill

45-15, which designated the WQPC as an excise tax imposed under the County's general taxing authority.

3.C.7 Montgomery County Trash and Litter Programs

The County actively participates in multiple programs and partnerships designed to meet the goals of the 2010 Anacostia Trash TMDL. The County is also working with the Anacostia Watershed Restoration Partnership, the Alice Ferguson Foundation, and other partners to meet regional trash reduction goals. Initiatives directly related to regional campaigns include ongoing education and outreach for recycling and litter reduction, mass media outreach campaigns, and litter removal from streets, stormwater ponds, and transit stops.

On March 30, 2018, the U.S. District Court for the District of Columbia ruled in favor of the Natural Resources Defense Council and directed EPA to develop or approve a replacement TMDL for the Anacostia River Trash TMDL. Natural Resources Defense Council contention was that the TMDL should contain a maximum load of trash, rather than the required removal of trash from the waterway. DEP plans to continue current efforts to prevent and reduce trash until a replacement TMDL is established at which point the efforts will be revisited and modified as necessary.

In January 2012, the County Council enacted Bill 8-11 (Taxation – Excise Tax – Disposable Carryout Bags) to help the County meet the permit requirements for litter reduction. The goal of the law was to increase awareness of disposable bag litter pollution and to reduce the use of carryout bags. The Carryout Bag Tax Law imposes a tax of 5 cents, which is collected at the point of sale, for each paper and plastic bag that a customer takes from certain retail establishments to carry purchases. The Department of Finance is responsible for enforcing the Carryout Bag Tax Law.

The County has revised the carryout bag tax law, and the new Bring Your Own Bag Law will take effect in January 2026. The new law amends the County's current law by increasing the bag tax to 10 cents (of which the retailer gets to keep 5 cents) and prohibits the use of plastic carryout bags. The revenues from this tax are deposited into the County's WQPC. The County has continued the outreach campaign related to the tax including improvements to the website, focused advertising, and updated outreach materials (such as, flyers, point of sale cards, and posters) for retailers, restaurants, and the public.

In January 2015, the County Council enacted Bill 41-14 (Solid Waste (Trash) – Food Service Products – Packaging Materials – Requirements), which bans the use and sale of expanded polystyrene food service ware and loose fill packaging. The law requires that disposable food service ware purchased and used in the County be either recyclable or compostable. The law is applicable to all food service businesses as of January 1, 2017. DEP's Division of Solid Waste Services developed an education campaign to inform food service businesses, certain retailers, and consumers about the requirements and the deadlines for compliance. In 2022, the City Council enacted Bill 33-20, which clarifies the requirements initially passed in Bill 41-14.

MCDOT also has numerous initiatives to reduce trash. The Adopt-A-Road Program has over 400 road segments, approximately 1 mile in length each, that have been adopted by community groups who pick up trash and litter. MCDOT supplies the community groups with equipment to perform the cleanup and are asked to hold two cleanups a year along their designated road. Transit stops (bus stops) are prime litter hotspots, and volunteers perform cleanups at these areas as well. Placement of containers is prioritized based on stop activity, and many of the locations are shared by both the County Ride On Transit System and Washington Metropolitan Area Transit Authority buses.

DEP Stream Stewards volunteer program offers a variety of opportunities including community cleanups, plogging program, storm drain marking, and storm drain art program. Community cleanups are organized by a group of watershed stewards, named Stream Striders, who lead cleanups and educate participants about watersheds, litter, and the environment. In FY24, the Stream Striders removed over 148,152 pounds of trash. Plogging is an activity that includes picking up trash during a jog and is encouraged by the Stream Stewards who provide free supplies to the volunteers. Storm drain marking and storm drain art initiatives educate the public about the connection between storm drains and the protection waterways.

In 2022, DEP installed the first trash trap within the Anacostia Watershed area located in the County. The trash trap was funded by the County Watershed Grant program administered by the CBT.

Table 3.C-6 summarizes the amount of litter and debris that were removed by the County's programs with a total of 2,382 tons of litter and debris being prevented from entering the storm drain system both within and outside the Anacostia Watershed.

Table 3.C-6. Litter and Debris Removed or Prevented from Entering Storm Drain System during Permit Term (Fiscal Year 2022 through Fiscal Year 2025)

Program	Tons Removed from Outside Anacostia Watershed	Tons Removed from Anacostia Watershed	Total Tons Removed from the County
Adopt-A-Road	81.26	10.47	91.71
Arterial Street Sweeping	1,179.52	709.05	1,888.57
DHCA Clean and Lien	133.66	0	180.66
Illegal Dumping and Enforcement	0.09	0	0.09
Inlet and Conveyance System Cleaning	106.64	36.68	143.32
Litter Collected Along Roadside Drainage	40.65	22.53	63.18
Trash Trap	0	0.06	0.06
Volunteer Cleanup Program	7.19	2.66	9.85
Total Removed	1,549.01	781.45	2,377.44

3.C.8 Maintenance of County Properties

The County has 11 facilities covered under the MDE General Discharge Permit for Stormwater Associated with Industrial Activities (12-SW). MDE accepted NOIs for these facilities in August 2024 for coverage under the general permit until January 31, 2028. All County facilities covered under General Permit 20-SW have maintained up-to-date permit coverage and have a stormwater pollution prevention plan (SWPPP). In implementing the SWPPPs, the County carries out best practices and good housekeeping activities such as routine sweeping, performs annual training, and constructs capital improvements related to pollution prevention.

For most of the industrial-permit facilities, DGS has the overall responsibility for meeting the requirements of the General Permit, including updates to the facilities' SWPPPs. Agencies housed at the

facilities are responsible for implementing portions of the SWPPP that relate to their operations, as follows:

- MCDOT Division of Highway Services and Division of Transit Services
- DEP Recycling and Resource Management Division
- DGS Fleet Management Division

Both the Fleet Management Division and the Division of Highway Services have program managers responsible for environmental compliance for their respective operations at these facilities.

GHPs were developed for 100 County-owned properties that are not required to be covered under MDE's SW Industrial GP. The GHPs were submitted to MDE in December 2024 and implemented thereafter.

3.C.9 Street Sweeping and Inlet Cleaning

The County's street sweeping and stormwater inlet cleaning programs continue to help reduce pollutants associated with roadways. The County uses vacuum street sweepers to remove debris and litter from streets. DEP administers sweeping on arterial routes monthly, except during the spring and fall when the routes are swept every 1 to 2 weeks. Arterial routes are typically larger roads with more commercial activity, traffic, and observable trash. MCDOT administers annual street sweeping on residential routes in the springtime to remove material from winter roadway operations.

MCDOT oversees the stormwater inlet cleaning program, removing materials from clogged inlets, storm drains, drainage ditches, outfalls, and adjacent drainage areas. A vacuum truck, mechanical pump truck, excavators, and manual labor are used to remove material, including organic matter, from the inlets and conveyance system. The program maintains thousands of miles of drainage ditches in the conveyance system, and provides removal of silt, organic material, and dirt from eroded areas. During the permit term, the County's street sweeping and inlet cleaning programs removed 2,032 tons of debris and litter.

3.C.10 Pollutants Associated with Vegetation Management

The County implemented a pest management program and plan in 2020 that includes specialized spray equipment and targeted application that achieves cost-efficient vegetation control using a minimum amount of herbicide. Montgomery Weed Control, Inc., conducts the County's state required roadside weed spraying program for noxious weeds, and follows operational BMPs regulated by the Maryland Department of Agriculture.

3.C.11 Salt Management Plan

The County maintains a comprehensive SMP that reduces the use of winter-weather deicing and anti--icing materials without compromising public safety. The plan was submitted to MDE in December 2024 and received comments in Spring 2025. DEP met with MDE in May 2025 to review feedback and plans to submit an updated SMP in December 2026, which will include programmatic expansions and enhanced public outreach.

The plan is based on the guidance provided on best road salt management practices described in the MDOT SHA SMP, which is developed and updated annually as required by Maryland Code, Transportation Section 8-602.1. The County is responsible for applying winter-weather treatment to approximately 5,400 miles of roads. The County is committed to minimizing the use of salt in its winter-

weather roadway treatment program. Salt brine is applied when conditions allow to prevent icing and thus reduce the overall salt use while remaining responsive during storm events.

The County conducts annual training for employees and contractors that emphasizes BMPs using the least amount of material necessary to maintain safe, passable roadways for motorists. Supervisors and managers receive additional training that covers the science of snow removal, effective winter storm management, winter materials inventory, the properties of salt, and data collection and analysis. MCDOT inspects all roads during and after winter events to review areas with salt spills or overapplication. In FY25, MCDOT piloted targeted winter sweeping operations in sensitive watersheds to remove excess salt from roadways, using vacuum sweepers to reduce the amount of salt entering storm drains and nearby water bodies.

3.C.12 Public Education and Outreach

The County maintains a robust public outreach and education program that meets permit requirements and also increases local awareness of SWM benefits to bring about associated behavioral changes to protect the County's water quality. Throughout the permit term, DEP events focused on targeting specific audiences, increasing stormwater and water quality awareness, encouraging residents to take specific environmentally friendly actions, and establishing baseline information through surveys. The baseline information will help in measuring outreach effectiveness, which will guide follow-up measures. DEP will continue to search for ways to estimate pollutant reductions from behavioral change, beyond those documented in the County Climate Action Plan, or will default to emission reduction or uptake potentials when established by MDE.

The County maintains a call center that allows residents to call one number (311) for all concerns in the County. The compliance hotline receives reports of water quality concerns, suspected illicit discharges, illegal dumping, spills, and flooding problems. After receiving the concerns, DEP follows up with the reporters, investigates the concerns, mitigates the issue, and, if applicable, imposes a fine on the responsible party.

My Green Montgomery is DEP's online education and outreach portal that provides information about watershed restoration, stormwater, community events, and stories focused on the environment, stream monitoring, and WQPC (My Green Montgomery n.d.). Social media posts on Facebook, Instagram, X, YouTube, and Nextdoor feature details on upcoming cleanups, recycling workshops, salting practices, program highlights of RainScapes and TreeMontgomery, and other environmental events.

DEP continued to host events and outreach campaigns to increase awareness of stormwater and water quality and encourage residents to take specific environmentally friendly actions. The permit requires the County to conduct a minimum of 130 outreach efforts per year. The County conducted over 2,277 efforts between FY22 to FY25 covering the following activities and topics:

- Resilience, Education, Action, Climate, Habitat Hub
- Water quality and watershed restoration
- Clean Water Montgomery stormwater implementation and outreach grants for eligible non-profit organizations
- Residential and community SWM implementation through the RainScapes and Tree Montgomery programs
- Stream Stewards Outreach and Stewardship Campaign

- Storm drain art and storm drain marking
- Lawn care and landscape management
- Litter reduction through voluntary community cleanups and outreach campaigns
- Reducing, reusing, and recycling
- Expanded food scraps recycling

3.C.13 Assessment of Controls

The County is responsible for fulfilling the 2021 MS4 Permit watershed assessment and trend monitoring requirements. MDE was informed in a letter dated March 4, 2022, that the County continued to monitor the Breewood Tributary through the end of CY22, then entered a pool monitoring agreement with CBT on July 1, 2023. The Breewood Tributary monitoring included chemical, biological, and physical monitoring, which concluded in results that showed environmental conditions to be generally better than before the restoration. The County's comprehensive plan for watershed assessment and trend monitoring was approved by MDE on January 4, 2024. In CY2024, the County began chloride monitoring at two sites, engaged contractual support to perform bacteria monitoring in four watersheds, and continued Countywide biological and habitat monitoring.

DEP performed benthic macroinvertebrates monitoring across County watersheds during each permit year. In FY24, the County finalized their bacteria monitoring plan and in FY25 began sampling four bacteria TMDL watersheds (Anacostia, Cabin John Creek, Lower Monocacy, and Rock Creek). In FY24, the County began monitoring in the Watt's Branch watershed using two continuous conductivity loggers.

In August 2024, the County submitted the updated TMDL Implementation for PCB, which was prepared according to the Guidance for Developing Local PCB TMDL (Total Maximum Daily Load) Stormwater Wasteload Allocation (SW-WLA) Watershed Implementation Plans (WIPs) (MDE 2022b).

3.D Program Operation and Capital Improvement Costs for the Permit Term

The 2021 MS4 Permit requires the County to submit an annual fiscal analysis of the capital, staffing, operating, and maintenance expenditures for the reporting period and the proposed budget for the upcoming year. The County has submitted annual expenditures and anticipated budgets each year of the permit term. The County's MS4-related programs are funded through the County's stormwater utility fee, known as the WQPC, the BMP monitoring fee, the tree canopy fee, the stormwater waiver fee, and the carryout bag tax. The County's original WQPC (2001) was assessed based on an equivalent residential unit, which is defined as 2,406 square feet, or the median IA associated with a detached SFR in the County. Associated nonresidential properties (that is, properties that drain into stormwater facilities that also serve residential properties) were also charged a fee based on their actual impervious cover.

In April 2013, the County Council enacted Expedited Bill 34-12 (Stormwater Management – Water Quality Protection Charge) to bring County law into compliance with a state law enacted by the General Assembly as House Bill 987, which mandated the levying of local charges to pay for stormwater remediation in Phase I jurisdictions. Modifications to the WQPC went into effect in FY14 and included applying the charge to all properties, including nonresidential properties not otherwise exempt under state law. The bill also allows property owners to obtain a credit for onsite SWM practices, exempts owner-occupied residential property owners who can demonstrate substantial financial hardship from paying the WQPC, and phases in increases to the WQPC. The WQPC includes seven payment tiers based on the actual amount of the property's impervious surfaces. Other changes included establishing a program to award grants to nonprofit organizations for water quality protection or improvement projects.

The County Council is required to set the equivalent residential unit rate each year. In FY25, the rate was $147.00 per equivalent residential unit. Biennially, the County has submitted a draft FAP to MDE. The FAP includes annual and projected 5-year costs needed to meet the Permit's ISR goal based on MDE requirements.

3.D.1 Capital Improvement Project Costs

The Permit requires the County to submit estimated costs and actual expenditures for watershed restoration program implementation.

3.D.2 Fiscal Year 2022 through Fiscal Year 2025 MS4 Program Expenditures

A summary of FY22 to FY25 actual costs, as well as the appropriated costs of FY26, for both capital and operating expenditures associated with MS4 Permit requirements, is provided in Table 3.D-1. Operating expenditures include operating and personnel expenditures for SWM, ESC, IDDE, property management, public education, stormwater restoration, TMDL, assessment of controls, and DEP administrative and reporting expenditures. Capital expenditures include capital and personnel expenditures for SWM, property management, stormwater restoration, and TMDL compliance. Expenditures also include debt service payment for DEP and MCDOT CIP restoration and outfall projects. Over the permit term from FY22 to FY25, costs associated with MS4 Permit requirements have increased by 36 percent.

Table 3.D-1. FY22 through FY256 MS4 Program Operating and Capital Expenditures

Fiscal Year	Total FY Operating Expenditures	Total FY Capital Expenditures	Total FY Expenditures for MS4 Program
FY22	$64,736,758	$10,900,542	$75,637,700
FY23	$56,836,859	$13,381,787	$70,218,646
FY24	$65,210,276	$14,980,219	$80,190,495
FY25	$82,655,708	$18,216,038	$100,871,746
FY26[1]	$61,568,389	$20,295,870	$81,864,259
Total Expenditures:	**$331,007,990**	**$77,774,456**	**$408,782,446**

[1] Appropriated budget.

3.E Proposed Permit Condition Changes

The County is committed to meeting the Permit requirements and achieving the ultimate goal of improving water quality. The County has made great strides in building a robust stormwater program, restoring 7,238 IAs since the issuance of the second-generation permit in 2001, establishing a dedicated funding source in 2003, implementing a comprehensive inspections and maintenance program, and establishing a wide array of public outreach and education initiatives.

The County has made significant strides towards achieving its MS4 Permit goals. While the County has not yet reached all permit targets, substantial progress has been made in key areas. The County plans to reach, and exceed, the 2021 ISR goal of 1,814 acres by the end of the permit term in 2026. Table 3.E-1 shows the current annual benchmark status and anticipated schedule for the remaining permit term.

Table 3.E-1. Current Annual Restoration Benchmark Progress and Schedule

Metric	Year 1	Year 2	Year 3	Year 4	Year 5
Fiscal Year	2022	2023	2024	2025	2026
Cumulative Percent IA Restoration Completed	60	63	66	72	102
Actual IA Restoration Completed	1,090.55	1,145.24	1,189.83	1,302.15	1,857.49

The County is prepared to continue its ISR work at the rate of 5 percent (approximately 1,000 additional acres) over the next 5-year permit term due to more of the budget allocated to cover increasing operations and maintenance needs, manage debt, and cover increasing construction costs. However, as restoration costs per IA have steadily risen and the demand for inspection and maintenance of both new and existing facilities continues to grow, the County is seeking additional planning time to explore innovative, cost-effective strategies that go beyond traditional ISR approaches and target the water quality goals as outlined in Section 3.B. The County's proposed permit condition changes are listed as follows:

- SWM
  - Allow alternative inspection schedules for different BMP types, including alternative BMPs, rather than requiring a one-size-fits-all triennial inspection frequency. Not all BMPs require inspection every 3 years; some can be inspected at longer intervals.
  - Recognize the tremendous amount of staff time and funding that is used to operate and maintain the existing and growing BMP inventory and adjust the restoration goals to accommodate the increased responsibility of operation and maintenance and repair of aging infrastructure.
- Litter and floatables
  - Maintain focus on complying with the Anacostia River Watershed Trash TMDL and apply lessons learned to the rest of the County as applicable.
- Restoration requirements
  - Recognize that using ISR as the primary standard by which performance is measured has prevented MS4s from focusing on water quality and implementing practices that address pollutants directly. Maryland MS4s cannot measure their progress using the same water quality credits that are approved by EPA and available to MS4s in other Chesapeake Bay states,

including SR protocols, nitrogen reductions for connecting septic systems to sanitary sewer, and retrofits of older SWM facilities to provide channel protection volume.

- Better integrate ISR, local TMDL, and Chesapeake Bay TMDL requirements is needed to avoid competing priorities.
- Allow adequate time and resources to continue comprehensive watershed assessment studies to target the County's water quality, environmental, and racial equity and social justice goals. Given the complexity of watershed characteristics and issues, the County needs sufficient planning time and budget allocation to thoroughly review and evaluate the watershed assessments. The permit should include a dedicated planning phase to conduct additional studies and develop well-informed, effective strategies for SWM and water quality improvement.

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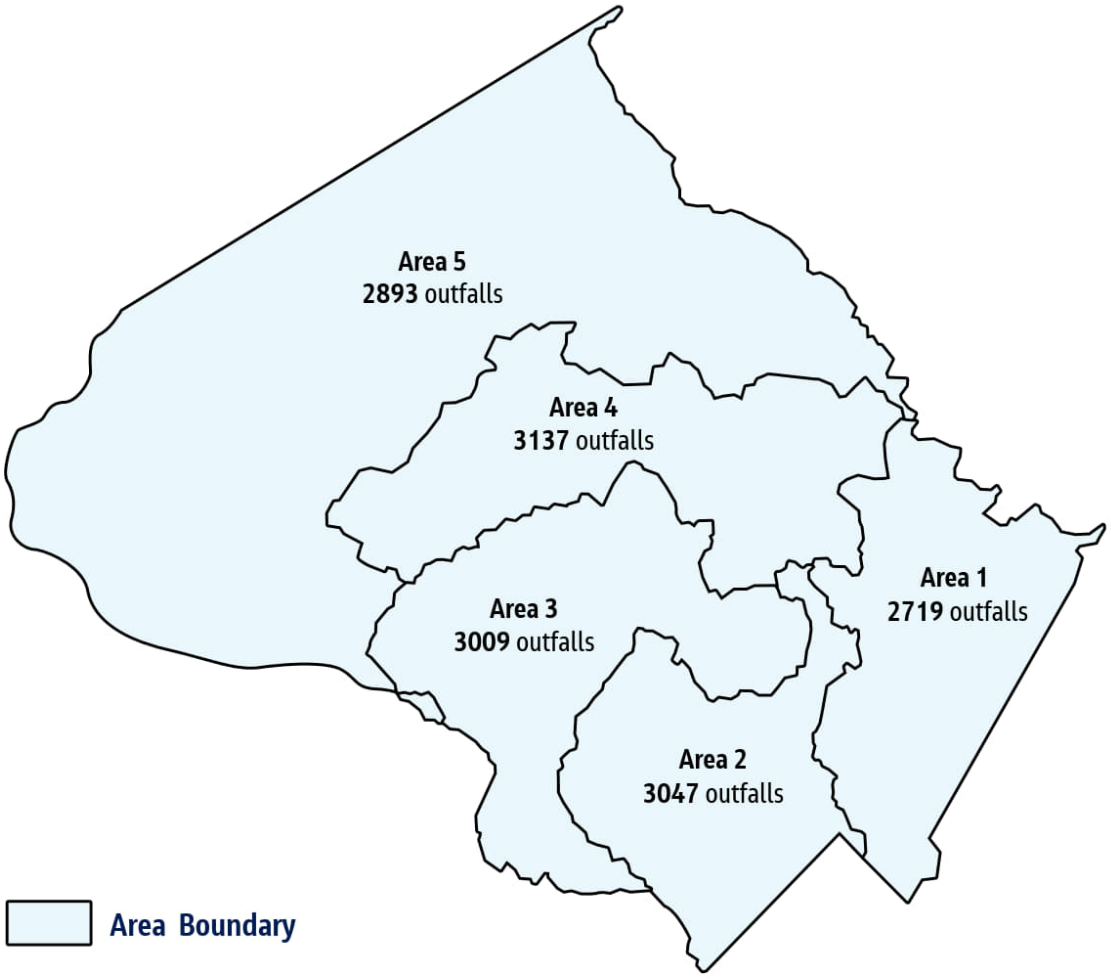
Appendix A
Illicit Discharge Detection and Elimination

Appendix A1
Montgomery County Illicit Discharge Detection and Elimination Standard Operating Procedures

Appendix A1
Montgomery County Illicit Discharge Detection and Elimination Standard Operating Procedures (revised September 5, 2023)

At a minimum, the Montgomery County Department of Environmental Protection (DEP) will survey 150 outfalls and 40 hotspots within a given mapped area during each fiscal year. The areas will rotate annually wherein all of Montgomery County will be surveyed during a 5-year period (Figure A-1). This appendix details Montgomery County's standard operating procedures (SOPs) for its illicit discharge detection and elimination (IDDE) program.

Figure A-1. Illicit Discharge Detection and Elimination Areas and Number of Outfalls per Area



A.1 Annual Illicit Discharge Detection and Elimination Standard Operating Procedures

This section lists the annual illicit discharge detection and elimination (IDDE) standard operating procedures (SOPs).

A.1.1 Section 1. Identifying Target Commercial and Industrial Hotspots and Outfalls for Surveying

1. Identify target commercial and industrial hotspots:
    a. Define hotspots as properties zoned as commercial or industrial.
    b. Determine number of commercial versus industrial hotspots to survey during each cycle as a percentage of the area's total combined commercial and industrial properties.
    c. Resurvey hotspots that required enforcement action during the previous survey cycle as part of the 40 minimum hotspots surveyed.
    d. Do not resurvey hotspots that did not have issues during the previous survey cycle if possible.
    e. Determine hotspots to be surveyed based on proximity to inlets and outfalls and streams with hotspots closer to inlets and having higher priority.
    f. Use staff knowledge about known hotspots to identify hotspots to be surveyed.
2. Identify target outfalls:
    a. Define outfalls as outfall structures owned and maintained by Montgomery County.
    b. Resurvey outfalls that had pollution issues during the previous survey cycle as part of the 150 minimum outfalls surveyed.
    c. Determine outfalls to be surveyed based on proximity to commercial and industrial properties and inlets.

A.1.2 Section 2. Selecting Hotspots and Outfalls

1. Select hotspots:
    a. In Geographic Information System (GIS), use the *Property Layer* from the County's Spatial Database Engine (SDE) to select all properties that have an industrial or commercial land use code in the "Land Use Codes" field (refer to Table A-1).

Table A-1. Specific Land Use Codes

Type	Code	Description
Industrial	200	Industrial Park (multiple buildings, single ownership of land)
Industrial	201	Industrial Production, Multiple Occupancy – Mixed Industrial Use
Industrial	202	Industrial Production, Multiple Occupancy – Mixed Industrial Use (condominium)

Type	Code	Description
Industrial	203	Industrial Production, Single Industrial Use (fee simple)
Industrial	204	Industrial Production, Single Industrial Use (condominium)
Industrial	205	Mixed Industrial and Commercial
Industrial	206	Mixed Light Industrial (Single Occupancy)
Industrial	637	Warehouse Storage Facilities (nontransportation, communications, and utilities) – primary storage of goods to be used elsewhere
Commercial	501	Regional Shopping Center (large – Montgomery Mall, White Flint, Lake Forest, Wheaton Plaza)
Commercial	502	Sub Regional Shopping Center
Commercial	503	Convenience Center (major anchor is grocery or drug store) – several stores at one location
Commercial	504	Highway Commercial
Commercial	531	Department Store
Commercial	521	Lumber and Other Building Materials
Commercial	541	Groceries – Retail
Commercial	551	Motor Vehicles – Retail
Commercial	553	Gasoline Service Stations
Commercial	641	Automobile Repair
Commercial	559	Other Automotive – Retail Trade
Commercial	580	Fast Food Eating Places
Commercial	581	Eating and Drinking (non-fast food)

b. Remove properties surveyed during previous survey cycle that did not have issues.

c. Identify commercial and industrial properties 100 feet from inlets and 250 feet from outfalls and streams for survey until 40 hotspots are found; increase or decrease search radius by increments of 50 feet until 40 or more targeted hotspots are found.

d. Create maps for each hotspot that includes property address and contact information for management and owner.

e. Disseminate an equal number of hotspots amongst staff for surveying.

2. Select outfalls:

a. Use *the outfall layer* from the County's SDE to determine a minimum 150 outfalls.

b. Automatically select outfalls with pollution issues from the previous survey cycle to be resurveyed as part of the 150 minimum outfalls.

c. Identify targeted outfalls within 100 feet of an inlet and within 100 feet of a stream for survey until the 150 minimum outfalls is reached; increase or decrease search radius by increments of 50 feet until 150 or more targeted outfalls are found.

d. Compile a list of unique outfall IDs from the "Feature ID" field in the *outfall layer*'s attribute table (for example, JP123P0989) .

e. Disseminate an equal number of outfalls amongst staff fur surveying.

f. Conclude all surveys by June 30 of the survey year.

A.1.3 Section 3. Performing Hotspot Surveys

1. Conduct pre-hotspot survey:
   a. Have staff familiarize themselves with the hotspot and its business.
   b. Review property map and determine entrance and parking situation.
   c. If site access is limited, contact the property owner to arrange hotspot survey.
   d. Fill out the hotspot assessment form (HAF; attached) with property information.
2. Conduct hotspot surveys:
   a. Arrive to site and announce intentions to property owner or manager if present; obtain contact information if unknown.
   b. Walk as much of the property as possible and around buildings; complete HAF during walk if possible.
   c. Note and photograph any violations (refer to Figures A-2 and A-3.
   d. Finish completing the HAF at car if unfinished.
3. Conduct post-hotspot survey:
   a. Have staff create a case within DEP's CaseBase investigation database for each hotspot surveyed: Water Quality, Surface Water or Hotspot Survey.
   b. Provide case description as "<Year> hotspot survey of <property>."
   c. Provide case location as the property addressed surveyed.
   d. Add any property owner or manager information to contacts.
   e. Scan the HAF into PDF and attach it to the case as "Sample Results" document.
   f. Input all actions as description of the visit.
   g. If problems are found, take the appropriate enforcement action to ensure compliance (refer to Section 5 for enforcement actions).

A.1.4 Section 4. Performing Outfall Surveys

1. Conduct pre-outfall survey:
   a. Ensure the following necessary equipment is taken:
      - Personal items (for example, proper clothing, water, food, and bug spray; waders and high boots are recommended)

- Fully charged iPad with access to Online Outfall Application and Explorer Mapping app
- Test kits for chlorine, detergents, copper, and phenols
- Oakton, Hydrolab, or device to measure water temperature and conductivity
- Tape measure
- Gloves
- Liquid-waste container
- Outfall Field Sheet (attached)

b. Familiarize yourself with outfall to be surveyed, noting access points and parking.

2. Conduct outfall surveys:
   a. Provide required information on Online Outfall Application (attached).
   b. If flow present, then proceed as follows:
      i. Perform required chemical tests (chlorine, detergents, copper, and phenols).
      ii. Collect required temperature and conductivity water parameters.
      iii. Determine flow using fill method or application measurement method (see attached outfall screening and monitoring field sheets).
   c. If suspicious flow is found, dry weather flow found to be exceeding any chemical parameter limits, as set by MDE, and/or containing suspicious discoloration, odors, floatables or conditions deemed suspicious by the investigator, is found (refer to definition of pollution and suspicious flow), then proceed as follows:
      i. Halt survey and immediately investigate suspicious flow.
      ii. Call in additional help if necessary.
      iii. Investigate up-pipe until source is found or investigation is inconclusive.
   d. If no suspicious flow found, then complete online form, photograph the outfall, attach photographs to form, upload the form, and confirm successful upload before moving on.
   e. If the suspicious flow source is found, take appropriate enforcement action to ensure compliance (refer to Section 5 for enforcement actions).
3. Conduct post-outfall survey:
   a. Check CaseBase and ensure PDF form, correct location, and pictures are uploaded.
   b. Enter survey actions into CaseBase.
   c. Follow-up on outfalls with suspicious flow within 2 weeks of initial survey (weather permitting), and complete Outfall Follow-up Form (attached) with each follow-up visit.
   d. Forward follow-up site visits to IDDE lead staff.
   e. Forward any mistakes entered or changes needed to information technology (IT) staff.
   f. Forward newly found outfalls found to IT to add to geographic information system (GIS) layer.

A.1.5 Section 5. Achieving Compliance Through Enforcement Actions

1. When violations are found, establish primary goal to bring the offender into compliance.
2. Take appropriate enforcement action for violations discovered:
    a. Issue verbal or written warnings as first enforcement step for first-time offenders or lesser issues.
    b. Issue a notice of violation (NOV) as a second step when warnings do not achieve compliance.
    c. Issue civil citations with fines of $500 as the last enforcement step when the NOV does not achieve compliance; use civil citations for repeat offenders or egregious violations.
3. Use timeframe for achieving compliance:
    a. Ensure offenders cease any activity that causes violations and pollution immediately.
    b. Depending on the nature of the violation, request offenders to come into compliance within 30 days of the NOV (provided pollution is immediately ceased).
    c. Work with offenders to ensure they achieve compliance and extend compliance deadlines if reasonable.
    d. Issue civil citation(s) if compliance is not achieved within an agreed-upon timeframe.

A.1.6 Section 6. Common Violations Observed During Hotspot Surveys

Figures A-2 and A-3 show IDDE violations identified during past surveys.

Figure A-2. Poor Housekeeping at Businesses

Figure A-3. Grease Spills and Poorly Maintained Used Grease Containers

Appendix A2
Investigated Water Quality Issues

Appendix A2
Investigated Water Quality Issues in FY25

Case No.	Location Description	Issue	Enforcement Action	Resolved
20251163	5555 Wisconsin Ave	None	None	n/a
20251164	Geico 5260 Western Ave	None	None	n/a
20251165	Jiffy Lube 3825 Dupont Ave	Water Quality	Verbal Warning	Yes
20251166	Stella Point Grille 3739 University Blvd W	Grease	Notice of Violation, Citation	No
20251167	4227 Howard Ave	None	None	n/a
20251168	4219 Howard Ave	None	None	n/a
20251169	4217 Howard Ave	None	None	n/a
20251170	Office Link 4213 Howard Ave	None	None	n/a
20251171	Dish and Dram Restaurant 10301 Kensington Pkwy	Water Quality	Verbal Warning	Yes
20251172	ADC Autobody 4233 Howard Ave	None	None	n/a
20251200	La Ferme Restaurant 7101 Brookville Rd	Grease	Notice of Violation	Yes
20251201	The Blairs 1300 East West Hwy	None	None	n/a
20251202	Blair Park Shopping Center, District Taco 1310 East-West Highway	Grease	Notice of Violation	Yes
20251202	Blair Park Shopping Center, Giant Food 1280 East-West Highway	Water Quality	Notice of Violation	Yes
20251202	Blair Park Shopping Center, Mamma Lucia 1302 East-West Highway	Grease	Citation	Yes
20251204	Sunoco 8384 Colesville Rd	Water Quality	Verbal Warning	Yes
20251207	BBQ Chicken & Beer 2235 Bel Pre Rd	Grease	Notice of Violation	Yes
20251208	McDonalds 2207 Bel Pre Road	Water Quality	Verbal Warning	Yes
20251209	Mulheron Tree Experts 2749 Garfield Ave	Water Quality	Notice of Violation	Yes
20251210	8555 16th St	None	None	n/a
20251211	BP Gas 2601 Forest Glen Rd	Solid Waste	Verbal Warning	Yes
20251212	Black Diamond Restaurant 8407 Ramsey Ave	Grease	Notice of Violation, Citation	No
20251238	4215 Howard Ave	None	None	n/a
20251244	Mary & Mike's Auto Repair 11500 Schuykill Road	Water Quality	Verbal Warning	Yes
20251246	Cabin John Village Shopping Center 7817 Tuckerman Ln	Grease, Water Quality	Verbal Warning	Yes
20251296	White Flint Station Shopping Center 11620 Rockville Pike	Grease, Water Quality	Verbal Warning	Yes
20251345	Delnor Center 12100 Nebel St	Water Quality	Verbal Warning	Yes
20251346	12001 Nebel Street	Solid Waste	Verbal Warning	Yes
20251390	Park Potomac Shopping Center 12435 Park Potomac Ave	Grease	Verbal Warning	Yes
20251492	Founding Farmers 12505 Park Potomac Ave	Grease	Notice of Violation	Yes
20251575	Pike & Rose 11800 Grand Park Ave	None	None	n/a
20251606	Enterprise Rent-A-Car 11760 Parklawn Dr	Water Quality	Notice of Violation	No
20251808	Bethesda Market 4611 Sangamore Rd	Grease	Verbal Warning	Yes
20251809	Giant Food 10400 Old Georgetown Rd	Water Quality	Verbal Warning	Yes
20251813	Champlain Building 6410 Rockledge Dr	None	None	n/a
20251814	Camalier Building 10215 Fernwood Rd	None	None	n/a
20251815	6701 Democracy Blvd	None	None	n/a
20251817	Two Democracy Plaza 6707 Democracy Blv	None	None	n/a
20251818	6711 Democracy Blvd	None	None	n/a
20251819	Exxon Gas 6727 Goldsboro Rd	None	None	n/a
20251857	Home Depot 7111 Westlake Terr	None	None	n/a
20251858	Westfield Montgomery Mall 7101 Democracy Blv	Grease	Verbal Warning	Yes
20251885	NIH 6705 Rockledge Dr	None	None	n/a
20251898	Glen Echo Center 7303 Macarthur	None	None	n/a
20251899	6400 Goldsboro Rd	None	None	n/a
20251900	5409 Butler Rd	None	None	n/a
20251901	Ourisman Jeep 5410 Butler Road	None	None	n/a
20251902	Public Storage 5425 Butler Road	None	None	n/a
20251903	La Cobanerita 5450 Butler Road	None	None	n/a
20251904	Audi Bethesda 5206 River Road	Solid Waste	Verbal Warning	Yes
20251905	5221 River Road	None	None	n/a
20251906	5272 River Rd	None	None	n/a
20251907	Public Storage 5337 Westbard Avenue	None	None	n/a