Maine/Massachusetts Joint Pilot Stormwater Environmental Results Program

I.   Project Title: Stormwater Environmental Results Program (ERP): Voluntary Certification Pilot Program to Reduce Stormwater Pollution from Existing Commercial Businesses' Impervious Surfaces

II.   Project Applicant(s): Maine DEP and Massachusetts DEP

III.   Project Cost: $300,000

IV.   Project Period: October 1, 2007 to September 30, 2011

V.   Narrative Elements:

a.   Overview of the Project: The Maine Department of Environmental Protection (ME DEP) and Massachusetts Department of Environmental Protection (MA DEP) project team will develop and implement a voluntary self-certification stormwater control program addressing heavily used parking areas at existing commercial developments. Using similar baseline and change measurement protocols, outreach materials and stormwater Best Management Practices (BMPs), the two states will solicit participant businesses to install stormwater BMP technologies at "hot spots" within these parking areas. These technologies may include, but will not be limited to, oil/water separators, and bio-filters such as tree boxes and rain gardens.

As specifically described below, the project team has access to data that establishes baseline water quality in our selected watersheds. We will develop an estimate of baseline and post-implementation conditions for Total Suspended Solids (TSS), Phosphorus and Polycyclic Aromatic Hydrocarbons (PAH) in run off from the target sites which will be extrapolated based on the modeling data of the BMPs.

Each state will test two different incentive strategies to determine which is more effective in attracting participation by business. The project team also wants to determine whether the respective strategies had any influence over the participants' selection of BMP technologies. Maine will encourage participation by using "external" drivers - such as increasing public awareness of stormwater effects on water quality; encouraging involvement by existing watershed organizations and municipalities and urging them to encourage businesses to participate; and green branding by DEP of successful participants as "Environmental Leaders." Massachusetts will rely upon "internal" drivers. These drivers include encouraging the sector's desire to demonstrate that voluntary programs can work as well as existing or future mandatory permitting programs, and the advantages they could reap from showing the public that they are responsible environmental stewards.

Assessing these respective approaches will allow us to evaluate the relative effectiveness of relying upon "external" or "internal" drivers in encouraging behavior change demonstrated by the voluntary installation of BMP technologies.

Project implementation should result in reductions of pollutants into receiving waters (through

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the installation of additional stormwater BMP technologies); an analysis of the relative effectiveness of the two strategic incentive approaches; and an evaluation of the strengths and weaknesses of this ERP application.

Problem Statement: Stormwater pollution from existing developments is a significant contributor to the impairment of lakes and streams in urban watersheds. National and state efforts to reduce stormwater pollution have resulted in stormwater permit requirements for redeveloped property. However, developments completed before the imposition of a permit program are not required to obtain stormwater permits. Thus, existing users can indefinitely continue to pollute at existing levels.

Research has shown that certain types of businesses, such as fast food "drive-throughs" and large parking lots associated with malls, contribute inordinately to water quality problems in local receiving waters. (There are many peer-reviewed papers supporting this conclusion. In particular, see Tom Schueler's "Hydrocarbon Hotspots in Urban Landscape: Can They Be Controlled?") published in Watershed Protection Techniques 1 (1) 3-5. This pilot targets these urban "hot spot" businesses where stormwater flows into impaired waters. The pilot focuses on encouraging the retrofit of modern stormwater BMP technologies at these un-permitted, heavily used impervious surfaces to hasten the date when the receiving waters will meet water quality standards. The project team will select among the following significantly impaired watersheds: the Upper Charles River in Massachusetts; or Long Creek, Penjajowoc Stream, or Thatcher Brook in Maine.

Technical Approach: ERPs have proven their ability to reduce specific point source pollutants generated by specific industries (e.g., removing mercury from dental practices and preventing pollutants generated by auto body shops from entering storm drains). This pilot will test the effectiveness of an ERP approach to controlling non point sources. More specifically, the pilot will determine the effectiveness of an ERP in encouraging specific business sectors to implement stormwater BMP technologies. The project will proceed in the following manner:

1) Select the study areas using the following criteria: Maine will choose urban, impaired streams that have the highest density of hotspots. Massachusetts will select an urban, significantly impaired stream;
2) Define the total area of impervious surface of all drive-throughs or malls located in the chosen watershed (the "universe");
3) Each state will measure the impervious project area in the watersheds for each targeted business sector to measure water quality improvement based on implementation of BMP technologies;
4) Solicit participants from the total number of businesses in each sector relying either on external incentives (Maine) or by appealing to internal values (Massachusetts).
5) Develop compliance assistance tools and delivery methods
6) Provide similar compliance assistance, including training workshops in each state (e.g., data and training for the BMPs will be the same);
7) Using the same menu of stormwater BMPs, each state will assist participants to install the BMPs in their impervious areas;
8) The team will calculate the modeled percentage of pollutant reductions

that will be achieved by the installation of each type of BMP technology, and;

9) The team will then compare the relative success of the two states' incentive approaches and their selection of business sectors, and evaluate the transferability of this ERP to a watershed-wide or statewide program.

1. Goals & Objectives of the Project: The project will use ERP methodology to identify, engage and collaborate with specific commercial sectors that significantly contribute to stormwater pollution. By concentrating on specific pollutant hotspots, Maine and Massachusetts will test and evaluate different ERP strategies designed to reduce stormwater pollution. In short, we will attempt to determine whether an ERP approach to this problem can be as effective, or more effective, than traditional enforcement and permit programs in achieving reductions in stormwater pollution and/or regulatory compliance.

2. Logic Model – see attached

3. Table and Narrative Describing key activities and milestones

    1) **CURRENT SITUATION AND NEED** - Maine and Massachusetts have a clear need to solve existing water quality problems affecting impaired or soon to be designated impaired water bodies. This need is demonstrated by the dramatic increase in development in both states; and the corresponding increase in the number of impaired or soon to be impaired water bodies. (This is documented in both the Maine and Massachusetts draft and final TMDL reports for these watersheds). An innovative solution such as ERP offers an alternative to the traditional enforcement/compliance model that allows us to proactively work with unregulated facilities and encourage upgrades in stormwater BMPs. This is important because states are generally not sufficiently staffed to implement traditional permitting programs. This will also be true for any future stormwater permitting program, which would include thousands of g commercial sources of stormwater pollution. A diverse set of public and private entities are actively pushing both Maine and Massachusetts to improve water quality and to identify and implement non-point source solutions. Both states are responding to these concerns by developing mechanisms utilizing known and proven stormwater quality solutions (BMP technologies) to improve impaired watershed water quality, and then inform interested parties about our progress. By implementing an ERP program, both states will be able to efficiently utilize shrinking resources while developing transferable technical information and implementation techniques.

    2) **OBJECTIVES AND PUBLIC BENEFITS -** In addition to water quality improvement, the following sets out our specific goals:
        1. Increase the number of facilities implementing BMPs;
        2. Increase the number of BMPs being implemented within the

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specific sector;

3. Increase public's and the target business sectors' awareness of stormwater pollution and pollution prevention benefits;
4. Increase the technical transfer between universities, colleges, the states and pollution sources;
5. Decrease pollutant loading within the selected project watersheds;
6. Identify what changes in ERP approaches between Maine and Massachusetts would likely result in greater pollutant load reductions;
7. Expand both states' ability to reduce pollution by adding ERP to existing non-point source regulatory tools;
8. Transfer relevant elements of the project internally within both state systems to promote the use of ERP; and
9. Provide recommendations in our final report to effectively transfer successful elements of the project nationally.

The following are the public benefits expected as outcomes from the project:

1. Increased public and municipal awareness of stormwater pollution and appreciation of pollution prevention benefits;
2. Increased number of facilities implementing BMPs and an increase in the number of BMPs being implemented within the sector;
3. Decrease of pollutant loading within selected project watersheds;
4. Watershed Implementation Plan successes become more widely known and achievable; and
5. Progress in reducing impairment of water bodies;

Milestones and Timelines -The following timeline estimates are based on EPA's estimated final award date of October 2007. The key elements and staff involved are included in the table, along with the identification of deliverables and outputs for quarterly reporting, and the final case study report.

Activities	Milestones	Staff	Begin Timeline	End Timeline
Receive EPA grant funding.		Sara, Julie, Fred	October 2007	October 2007
Develop and complete a draft Quality Assurance Project Plan (QAPP) and final Logic Model; include draft sampling plan.	Draft QAPP Final Logic Model	Sara, Julie, Fred	October 2007	November 2007
Staff assigned to project begins coordinating with stormwater staff and gathering existing data including TMDL and urban impaired streams.		Sara, Julie, Fred	October 2007	November 2007
Coordinate and implement monthly meetings and conference calls for Maine and Massachusetts; may include Washington as a "learning state".		Sara, Julie	October 2007	November 2007
Identify and begin enlisting the participation of volunteer participants: owners/operators of large commercial multiuse businesses (MA) and drive-throughs (ME).		Fred, Sara	October 2007	January 2008
Train Pilot staff in stormwater BMP and hot spot analysis.	Agendas and training materials provided in training	Sara, Jeff, Julie, Fred	October 2007	October 2008
Write a Gantt chart detailing flow of work and timelines based on the Logic Model.	Gantt Chart detailing work flow and timelines	Sara	October 2007	January 2008

Actions	Milestones	Staff	Begin Timeline	End Timeline
Select/confirm target watersheds based on state's draft and final TMDL data.	Confirm target watersheds	Sara, Julie, Jeff , Fred	November 2007	November 2007
Design an ERP sampling approach that can determine whether any statistically significant changes in compliance performance have occurred as a result of using the ERP; include 3rd party statistical consulting assistance included within the QAPP development.	Statistical Sampling Design Report	Sara, Fred	November 2007	March 2008
Adopt a final QAPP for the project based on the ERP sampling approach described above.	Adopt final QAPP	Sara, Fred	November 2007	March 2008
Develop stakeholders list for each state and begin contacting them (including stormwater BMP research facilities: Bowdoin College, University of New Hampshire, Fairchild Semi-Conductor and Iowa Waste Reduction Center regarding the interest in the project and dates considered for the first meeting.	Stakeholder list	Sara and Fred	November 2007	March 2008
Develop database for the Pilot.		Sara, Fred	December 2007	March 2008

Actions	Milestones	Staff	Begin Timeline	End Timeline
Develop list of retrofit "off the shelf" stormwater BMPs and technologies (filtration, bioretention, and "biological" technologies); include range of effectiveness for different pollutants (i.e., not just the listed pollutants, TSS and Phosphorus) and cost and maintenance data.	List of BMPs for the project	Julie, Fred	December 2007	January 2008
Survey, develop, confirm list of ERP candidates (targeted facilities) through research and development and input into database		Sara, Fred	December 2007	March 2008
Review existing compliance records within both state departments to avoid inspecting facilities with recently identified or ongoing compliance issues.		Sara, Fred	December 2007	March 2008
ME only: Convene Stakeholders (Compliance Advisory Panel) Meeting and review process.	Agendas and Outcome Summary	Sara, Julie	January 2008	March 2008

Actions	Milestones	Staff	Begin Timeline	End Timeline
Develop/implement Incentives to attract volunteers into ERP considering each State's approaches. Work with staff and senior management as well as outside agencies including sector associations and chains, as appropriate for each approach.	Summary Report Describing Incentives to be Tested	Sara and Fred with Julie's assist-ance	December 2007	March 2008
Develop at least 5 -10 Environmental Business Practice Indicators (EBPIs), including regulatory indicators, beyond compliance indicators and social marketing incentives (in ME include reduced idling)	5-10 EBPIs	Sara and Fred with Julie's assist-ance	December 2007	March 2008
Conduct independent review of data describing the effectiveness of stormwater technologies listed above utilizing an outside 3rd party (e.g., Fairchild Semiconductor, other corporate sponsor, Bowdoin College, UNH or Iowa Waste Reduction Center) to ensure these technologies can, by themselves or as part of a treatment train, at a minimum meet ME's (65-70% phosphorous and 40% TSS volume control) and MA's (80% TSS removal) pollutant removal standards			January 2008	June 2008

Actions	Milestones	Staff	Begin Timeline	End Timeline
Develop outreach and self-certification information and checklist	Outreach information Self-certification checklist	Sara, Jeff and Fred with Julie's assistance	January 2008	April 2008
Populate the ERP database to house the universe and indicator data.		Sara, Fred	January 2008	June 2008
Analyze and collate stormwater BMP data pollutant reduction, cost and maintenance data.		Sara, Jeff and Fred with Julie's assistance	February 2008	September 2008
Develop and complete a draft compliance workbook	Draft compliance workbook	Sara, Fred	February 2008	September 2008
Conduct random inspections/attain baseline BMP performance data.		Sara, Fred	May 2008	September 2008
Conduct baseline inspection data analysis.	Baseline inspection data analysis	Sara, Fred	August 2008	December 2008
Evaluate number and type of stormwater BMP engineered solutions (such as tree boxes) that should be installed at each target area and their relative cost. Coordinate this evaluation with our stakeholder/partners including Bowdoin College, UNH, corporate sponsors, IWRC (spell out) and NEWIPC (spell out) and w/in-house staff.		Sara, Fred	September 2008	December 2008

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Actions	Milestones	Staff	Begin Timeline	End Timeline
Conduct on-site workshops in each state's targeted watershed areas to educate Participants regarding ERP workbooks/checklists. Distribute workbooks to participating facilities. Encourage facilities to utilize workbook, complete checklist and submit. Both states will utilize developed incentives.	Conduct at least 4 on-site workshops	Sara, Fred	February 2009	July 2009
Make ERP information and Compliance guidebooks available on ME DEP and MA DEP Web sites for easy access and increased transferability to other states.	Copy of Website Materials in CD Copy	Sara, Fred	July 2009	September 2009
Mail workbooks and self-certification checklists to all facilities within the Universe.	Mail guidebooks	Sara, Fred	July 2009	September 2009
Review of self certifications by staff		Sara, Fred	October 2009	October 2009
Targeted follow-up among participating facilities, based upon certification results.		Sara, Fred	January 2010	March 2010
Follow up random post-certification compliance site visits conducted.		Sara, Fred	May 2010	June 2010

Actions	Milestones	Staff	Begin Timeline	End Timeline
Recognition of facilities that were in compliance and implemented beyond compliance and pollution prevention practices. Recognition would be through Environmental Leader branding (ME).	Award "Environmental Leader" recognition	Sara, Fred	July 2010	August 2010
Tabulate Scores for EBPIs and total compliance by: - Facility (aggregate EBPIs) - Industry (aggregate EBPIs)		Sara, Fred	June 2010	September 2010
Tabulate accuracy analysis scores for self certification vs. Inspections	Outcome Summary for Quarterly Report	Sara, Fred	June 2010	September 2010
ME DEP, assisted by MA DEP, will host at least 2 information exchange meetings for other states, tribes and/ or interested stakeholders to facilitate the transfer of information and innovation. These activities will include site visits to Environmental Leader facilities and demonstrations of pollution prevention and BMP solutions, including innovative stormwater solutions.	Agendas and meeting outcome summaries for at least 2 information exchanges	Sara, Fred	September 2010	September 2010

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Actions	Milestones	Staff	Begin Timeline	End Timeline
Explore other grants available through EPA (319 grants etc) and through Association resources and potential corporate sponsorships from larger companies to small companies that could be used to assist project partners in the installation of BMPs. This would assist additional facilities to become Environmental Leaders.		Sara, Fred	June 2010	September 2010
Conduct 2nd round of environmental certification.	Conduct 2nd round of environmental certification	Sara, Fred	June 2010	September 2010
Set-up ongoing support and monitoring of installed BMPs.		Sara, Jeff, Fred	August 2010	September 2010
Develop and Complete Case study of ERP project (final report).		Sara, Fred with assistance from Julie	August 20 10	September 2010
Complete and Submit Quarterly Reports	Quarterly Reports; 4 per year		October 2007	September 2010
Complete Final Report	Final Report			September 2010

3) **COMPLIANCE WITH FUNDING REQUIREMENTS** – The above milestones and objectives mentioned under section 3.b., as well as the "current situation and need" in section 3.a), set out both states' financial and resource needs. In addition, this project meets all of the additional requirements for funding set out in our respective regulatory framework, as follows:

This multi-state stormwater project meets each of the guidelines for the specific purposes of this assistance agreement program as follows: We present a framework for environmental innovation consisting of five major elements:

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1. Strengthen EPA's innovation partnership with states through our multi-state ERP project;

2. Focus on priority environmental issues such as restoring and maintaining water quality through stormwater BMP work, and potentially reducing the cost of water and wastewater infrastructure through the installation of cost-effective BMP technologies. In Maine, anti-idling awareness work will potentially reduce emissions of particulates, ozone precursors and greenhouse gases;

3. Diversify environmental protection tools and approaches by increasing stormwater information resources and environmental technology, providing environmental leader branding and regulatory incentives, and implementing results-based goals and measures through the ERP;

4. Summarize and promote most technically effective and cost-effective stormwater BMPs through web postings, and organizations such as the ERP Consortium and NEWIPC; and

5. Foster institutional behavior change through development of a more "innovation-friendly" organizational culture at our respective agencies. This would start through implementation of an intra-agency ERP model to a non-point pollution source. The project will lay out an integrated system of compliance assistance that encourages pollution prevention using self-certification (where permissible in lieu of permitting), and statistically-based measurement to gauge the performance of industry sectors in stormwater control success. Our success will be measured by a statistically-based compliance monitoring and enforcement program to help ensure that participating facilities achieve and maintain compliance.

This multi-state approach will demonstrate that agencies can reduce stormwater pollution generated by a large number of small sources; sources that program staff would be unable to reach in a timely manner due to resource and workload constraints. A compliance assistance workbook promoting improved environmental performance will be linked to performance measurement, including an annual self-certification form.

Promoting the project: In Maine, the project will involve an extensive list of public and private stakeholders, including the ERP consortium network, stormwater watershed implementation teams, associations and NGOs such as the New England Interstate Water Pollution Control Commission (NEWIPC), and through public and private entities. In Massachusetts, the project will use internal drivers (i.e., self-interest) to encourage participants to educate public and private stakeholders.

The scale-up for this multi-state stormwater ERP includes: expanding the application of ERP within and across business sectors; promoting the use of stormwater tools that lower administrative/permitting costs by using common metrics to measure performance results-a method that can be easily replicated and exported to other learning states by sharing data and environmental results; and continuing to facilitate the growth of a national network of states using ERPs made up of the ERP Consortium/learning states and associations such as NEIWPCC. These ERP linkages could also achieve economies of scale due to our creation of a multi-state ERP

applicable to a specific environmental vector (impervious surfaces at existing businesses/malls).

The statutory authorities indirectly or directly affecting this project include: the Clean Water Act, Section 104 (b) (3) (3 U.S.C. § 1254 (b) (3)]) – authorization to prevent, reduce or eliminate water pollution; Solid Waste Disposal Act, Section 8001 (42 U.S.C. §6981)– authorization to promote resource recovery and resource conservation systems and hazardous waste management systems, including the marketing of recovered resources; and Safe Drinking Water Act, Sections 1442 (a) and (c) (42 U.S.C. § 1(a) and (c)) – authorization to control and prevent the physical impairments of man resulting directly or indirectly from contaminants in water, or to the provision of a dependably safe supply of drinking water. Statutory Authority and Flexibility-State of Maine § 342. Commissioner, duties, 3-A Negotiating Agreements, The Commissioner may negotiate and enter into agreements with federal, state and municipal agencies.

State Agency Support- Maine DEP supports this proposed Stormwater ERP. Staff assigned to this project will be supported and guided by management. Massachusetts DEP also supports this proposed Stormwater ERP. The Commissioner's Office will assign staff to the project in order to ensure support and guidance by management.

In addition, the proposed project meets each of the Evaluation Criteria and the Qualitative Selection Factors, specifically the national strategic value of the project, environmental justice, and past performance of the state in State Innovation Grant Program funded projects. The project accomplishes this by targeting stormwater pollution, which is a National Priority Environmental Issue. The project also addresses stormwater sectors identified as posing multi-media compliance problems; and includes pollution prevention and the evaluation of cutting-edge stormwater technologies and the development of incentives encouraging their use. In short, the proposed ERP model will provide an innovative alternative to permitting that will provide measurable results.

Our project will contribute to achieving many EPA Strategic Goals including:
1. Cleaner air by demonstrating the implementation of anti-idling incentives as a part of the project (Maine only);
2. Cleaner and safer water by implementing stormwater BMP technologies through the ERP;
3. Potentially affecting preservation and restoration of land by improving the water quality of the watershed, thus improving the value and restoring the original condition (preservation) of the land;
4. Improving the health of communities and ecosystems by improving water quality as well as other media in areas that are designated environmental justice (EJ) areas;
5. Improving compliance rates and the quality of environmental stewardship with particular emphasis on water quality, while working on other media compliance issues; and
6. Implementing across strategies by assessing the current baseline condition of

watershed environments through hotspot analysis and priority evaluations; and making the information more accessible to the public and other stakeholders via the internet and through utilization of an automated ERP database.

Maine DEP and Massachusetts DEP will build on our existing knowledge of innovative approaches, expand the use of priority innovations through our ERP, and share our knowledge and solutions with our "learning state," the State of Washington. We will make information available through the ERP consortium and by presenting our findings at national meetings.

b. **ENVIRONMENTAL OUTCOMES** – The following environmental outcomes are expected. Please refer to the attached logic model to understand the expected flow of the project and outcomes:

Outcomes (expected benefits)**	How measured	Time/Resources needed to reach outcomes	Impacts and/or Changes in environmental conditions for individuals and populations
Increase number of Stormwater BMPs	ERP tools/site visits	Staff FTE Maine Partial funding Staff MA	Improve water quality through reduction in pollutant run off from the sites with installed BMPs. Increased public awareness and involvement though municipalities and Stormwater Management Plan steering committees
Increase number of facilities implementing BMPs	ERP tools/check lists & site visits	Staff FTE Maine Partial funding Staff MA	Increase watershed quality and environmental results Increased public awareness and involvement though municipalities and SWMP steering committees
Increase BMP technical transfer through Bowdoin, UNH and corporate mentoring and sponsorship	ERP workshops and site visits	Staff FTE Maine	Increased public awareness and involvement though municipalities and SWMP steering committees
Decreased stormwater pollutant loading in hotspot areas	ERP performances measurement and modeling results	Staff FTE Maine Partial funding Staff MA	Increase watershed quality and environmental results Improvement in water quality indicators

Outcomes (expected benefits)**	How measured	Time/Resources needed to reach outcomes	Impacts and or Changes in environmental conditions for individuals and populations
Potentially reduce number of urban impaired streams that may be deemed close to impairment Decreased pollutant loading in urban areas that may include environmental justice areas	ERP performances measurement and modeling results	Staff FTE Maine Partial funding Staff MA	Increase watershed quality and environmental results Increased public awareness and involvement though municipalities and SWMP steering committees Improvement in water quality signs and/or indicators overall Potential increase or stabilization of property values. Indication of improvement in water quality and overall environmental health via an environmental value assessment of the watershed

* Please note that all outcomes offer a dual benefit: a reduction in compliance costs due to the use of the self-certification tools; and an additional state's (Washington) environmental staff is trained in ERP
** Please link staff FTEs over the grant period along with travel and workshops to the milestones tables and staff assigned. In addition please refer to budget details.

e. **TRANSFERABILITY** – This stormwater ERP project should be easily transferable to other state programs after the grant is closed out. The Maine/Massachusetts project management team will present findings to their senior management team, including the Office of the Commissioners of both states to expand use of the ERP within existing stormwater programs. We will also propose applying the processes developed by this project to other non-point sectors. Opportunities to institutionalize ERP within our states' regulatory frameworks will be explored. Visual and media presentations, on-site demonstrations and other visual teaching tools will be used to organize the project and findings so that they can be used to train our staff.

Our project staff plans to collaboratively present the findings of the project on an ongoing basis at national stormwater meetings, as well as at regional and state meetings. Our presentations at national and regional meetings should facilitate the transferability of the project.

The ERP model will be written using a plain language format to develop a model that is readily comprehensible and replicable.

PUBLIC INVOLVEMENT/STAKEHOLDERS – Both states will rely upon the same scientific information showing that reducing stormwater pollution from existing uses is critical to improving water quality.

- Both states will reach the general public by meeting with storm water planning committees;
- Both states will leverage public notification/participation and behavior change by encouraging ERP participants to notify the public of their project's progress through mechanisms such as press releases;
- Both states will collaborate with sector-specific trade associations and NGOs to encourage and recruit voluntary participation;
- Both states will utilize incentives to attract and increase participation;
- Both states will rely upon the same technical information measuring the effectiveness of stormwater BMPs to reduce sediment, phosphorus and other pollutants;
- Both states will rely upon the volunteer participants to self-certify their BMP installations;
- Massachusetts will market the project directly to business and rely upon an alignment of the project's goals with the internal interests of the participants to encourage their participation.
- Massachusetts will also inform all other stormwater stakeholders about the progress of the project through regular meetings of its Stormwater Advisory Committee, meetings with municipalities and watershed associations in the affected watersheds, and with members of the general public who want to track the progress of the project;
- Maine will involve a wide range of stakeholders. These stakeholders will include MS-4 municipalities (including local storm-water planning committees); residents living in the watersheds; private interest groups; other businesses located in the impaired watersheds; and through the National Fast Food Chains Association (Maine) and Environmental Justice (EJ) communities. Maine will involve these stakeholders early in the process by holding meetings to discuss the project and record their comments and ideas; and
- Maine will inform all other interested parties through its Pollution Prevention Compliance Advisory Panel (P2 CAP), Office of Innovation newsletters and press coverage/releases.

I. **Reporting Requirements**

Quarterly program reports, including environmental outcomes to date, will be prepared and submitted to EPA. Reports from stakeholder meetings and other important milestones, as noted in the work plan, will also be distributed. Outcomes and results will be reported to other states and EPA through presentations at ERP Consortium meetings, EPA ERP All States meetings and other meetings as required. A Quality Assurance Project Plan (QAPP) will also be completed within 90 days of receiving the grant award.

Quarterly project reports and the final report will include the following:

- A summary of the work completed in the reporting period;
- Deliverables, outputs, outcomes, etc. completed in the reporting period;
- Description of progress on completing individual tasks and milestones reached;
- Any changes to the planned project schedule based on events;
- A look forward to the work to be done in the next reporting period;
- A summary of any revisions needed or made to the project work plan and or QAPP;
- QA reporting as required in the QAPP; and
- Summary information on grant fund expenditures by budget category.