

Municipality/Organization: City of New Bedford, MA

EPA NPDES Permit Number: MAR041140

MA DEP Transmittal Number: X265492

Annual Report Number

& Reporting Period: Year 12: April 1, 2014 - March 31, 2015

**NPDES PII Small MS4 General Permit
Annual Report
(Due: May 1, 2015)**

Part I. General Information

Contact Person: Ronald H. Labelle

Title: Commissioner

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Certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: Ronald H. Labelle

Printed Name: Ronald H. Labelle

Title: Commissioner, Department of Public Infrastructure

Date: 4/27/15

Part II. Self-Assessment

The City of New Bedford has completed the required self-assessment, and has determined that the municipality is in compliance with all permit conditions. Due to the tremendous success and positive comments received, in lieu of a formalized public outreach program/public meeting; the City again conducted informal public outreach efforts at various events to reach a larger and more diverse audience including both city residents and those within surrounding communities.

Part III. Summary of Minimum Control Measures

1. Public Education and Outreach

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 13
1-1	Education Flyer/Fact Sheet Distribution	Public Infrastructure	Flyer/Fact Sheet Update and distribute per time line	Participated in Earth Day Event and Home Show which was attended by 1,700 people. Distributed flyers at each event. Provided flyers to MIS Department for posting to the City's website Researched pre-printed flyers. Placed flyers at City locations such as City Hall, Libraries and Public Infrastructure Office.	Due to the tremendous success and positive comments received, continue participating in Earth Day Event and Home Show on March 5 and 6, 2016. Distribute flyers at each. Continue placing flyers at City locations as required. Provide MIS new flyers to update new website.

1-2	Annual Meeting	Public Infrastructure	Public Meeting Advertised and Conducted	A formal city wide public meeting was not conducted during this reporting period; however, the City attended the Home Show which was attended by over 1,700 people. Based on prior formal public meetings, this event captured a greater audience of not only residents of New Bedford but regionally to surrounding communities. As part of a stormwater improvements project that will be occurring along Coggeshall Street, the City conducted a public meeting at Cotali Mar Restaurant on November 10, 2014 regarding the project and importance of the system improvements. Public meetings were held with the Sassaquin Pond Neighborhood Association to address specific stormwater related issues.	Due to the overwhelming success of the Home Show and Earth Day events and positive comments received, the City decided to continue with these efforts. Continue coordinating outreach efforts on a project specific basis and with more focused/area local meetings including local neighborhood associations that are better attended than City wide public meetings. Participate in Earth Day Event and Home Show on March 5 and 6, 2016 distribute flyers at each. Continue public meetings with Sassaquin pond neighborhood association.
1-3	Web-page Flyer	MIS	Placement of stormwater flyer on City's website	The City's MIS Department updated the website which received the Massachusetts Municipal Association 2015 Website Award.	Flyers were removed as part of City's website update. DPI will resubmit to MIS. Continue to update and improve City's website including posting new flyers to web site.
1-4	Household Hazardous Waste Collection Day	Greater New Bedford Regional Refuse Management	Two Collection Days Held per Year	Household Hazardous Waste Collection Days were held on April 26 and October 26. Drug Take Back Day was held on September 27	Will continue with Household Hazardous Waste Collection Days held on May 2 and October 3, 2015. Car tire drop off day will be held on May 16, 2015 and Drug Take Back Day will be held on May 16, 2015.
1-5	Stencil Catch Basins	Public Infrastructure	Catch Basins Stenciled	Public Infrastructure has and continues to install permanent medallions on catch basins stating "Do Not Dump – Drains to Bay" as the inlets are replaced. During this reporting period, the City installed 155 permanent medallions.	Continue to install permanent medallions on all catch basins replaced. New catch basins installed as part of the Coggeshall Street project will have the permanent medallions installed.

1a. Additions

The Mayor has publicly promoted the City's initiatives to plant 500 trees per year within the City. Last year approximately 470 trees were planted. DPI continues to implement these improvements.

Mayor has also posted a YouTube web interview on the City's Facebook page regarding the new trash and recycling programs that were implemented in the City in 2014. The new program allows for "bin" use and placement of trash and recyclables in bins in lieu of leaving bags on the sidewalk.

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 13
2-1	Encourage Public Participation	Public Infrastructure	Mail flyer for distribution and hold annual public meeting	Coordinated with Sassaquin Pond Neighborhood Association to address stormwater pollution prevention controls. Attended City of New Bedford Home Show where 1,700 people attended. Attended annual Earth Day event. Began working with Greater New Bedford VocTech students which included DPI internships and development of public outreach materials, flyers, and handouts. Letters were sent to all business owners along the Coggeshall Street corridor to notify them to attend a public meeting on November 10, 2014 regarding the importance of an impending stormwater system improvements project.	Hold public City wide meeting. Coordinate efforts with Item 1-2 above related to outreach and education. Continue to update and submit new flyers as needed. Coordinate with MIS for posting on City website. Continue working with the students at Greater New Bedford VocTech for assistance in development of the public outreach program.
2-2	Establish Stormwater Management Committee	Public Infrastructure	Committee meets to review program's progress	The City worked with their consulting engineer to develop and revisit the draft stormwater ordinance that failed to pass vote by the City council in March 2013 to include additional requirements related to Low Impact Development. An agreement was signed, draft ordinance updated, and submitted to DPI, the City's stormwater committee, the Planning Department, and City's Solicitor's Office for review and comment.	Incorporate comments from various City departments and submit updated stormwater ordinance to the City Council for vote.

2-3	Stencil Catch Basins	Public Infrastructure	Catch Basins Stenciled	Public Infrastructure has and continues to install permanent medallions on catch basins stating "Do Not Dump – Drains to Bay" as the inlets are replaced. This past year 155 medallions were installed.	Continue to install permanent medallions and stencil catch basins with the assistance from environmental groups. New catch basins installed as part of the Coggeshall Street project will have the permanent medallions installed.

2a. Additions

The City is coordinating public outreach efforts for the stormwater system in conjunction with proper use of the sanitary wastewater collection system through their CMOM program and IPP initiatives.

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 13
3-1	Discharge Identification	Public Infrastructure	Stormwater Outfalls Mapped	The City entered into an agreement with their consulting engineer to make improvements to the existing GIS system which included flow direction and connectivity of piping network. These improvements are being coordinated with the City's initiative to locate and document stormwater outfalls. The City has identified, evaluated, and digitized most stormwater discharge locations to GIS. There are a number of discharge points to be verified. The City's Stormwater and Conservation Staff continue to work to identify these locations.	Continue to update GIS mapping with identified stormwater discharge points. Incorporate mapping and location efforts with the City's Computerized Maintenance Management System (CMMS) for development of preventive maintenance and work orders as needed. Begin implementing tablet technology with field staff which can be used to locate discharge locations in the field.

3-2	Drainage Mapping	Public Infrastructure	Map of stormwater system	City hired interns to continue to scan paper maps to electronic format. As part of the CMOM program and CMMS system implementation, completed updates on the GIS related to pipe flow direction and connectivity. Data continues to be refined. Stormwater maps continue to be digitized to GIS by City staff. City staff worked closely with engineering consultant on GIS related matters including data entry and training. Completed GIS needs assessment and began implementing recommendations.	Continue to update and digitize paper maps to GIS. Coordinate working with engineering consultant to complete GIS mapping as part of CMOM program. Continue to work with engineering consultant to implement improvements. Link scanned maps to GIS system for viewing in field through CMMS system and tablet technology. Coordinating these efforts with the CMOM program. New city projects publicly bid will have a GIS component included to locate new infrastructure that can then be directly uploaded to the GIS system. Coggeshall Street improvements will be the first project to utilize these new requirements.
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3-3	Illicit Discharge Identification	Public Infrastructure	Correct illicit discharges	City conducted an IDDE program in Outfall 027 area with the goal of identifying illicit connections. Seven (7) illicit connections have been identified in this area. GIS improvements and improved connectivity have helped to delineate specific drainage basins to locate illicit connections within the Outfall 027 area. Flow metering within the stormwater system and sewer systems in 2014 have helped locate potential illicit connections. This data is being reviewed and incorporated into the City's IDDE program.	Continue dye testing to identify any illicit connections in Outfall 027 area. Coordinate tablet technology being implemented as part of CMMS system to help document and locate illicit connections. Incorporate IDDE program in Outfall 027 area as well as other areas of the City into the alternatives analysis being completed as part of the City's LTCP/Integrated Capital Plan. Alternatives analysis expected to be completed by December 2015. As part of the Coggeshall Street project, sewer and stormwater system improvements will be implemented including directing existing sewer service connections to new sanitary sewers mitigating the potential for illicit connections along this corridor.
3-4	Enforce compliance to minimize illicit connections	Public Infrastructure	Correct illicit discharges	Stormwater ordinance with provisions for enforcement of illicit connections. Currently under review by various City Departments.	Once promulgated through the City Council, begin enforcement of the Storm Water Ordinance and regulations.
3-5 (same as 1-1)	Education Flyer/Fact Sheet Distribution	Public Infrastructure	Flyer/Fact Sheet Update and distribute per time line to include illicit discharges.	Attended New Bedford Home Show on March 7 and 8, 2015 and discussed various aspects of the stormwater and sewer system operations and maintenance with public from New Bedford and surrounding communities. Disputed flyers at Earth Day and Home Show events and at City owned locations.	Continue to update flyer and distribute them at Earth Day Event and Home Show at New Bedford Regional Vocational High School.

3a. Additions

As part of the City's CMOM program, a GIS Needs Assessment was completed. The City continues working with their on-call engineer to implement those recommendations in conjunction with a computerized asset maintenance system (CMMS) by September 2015 which will improve data tracking and maintenance activities. In addition, DPI is moving towards electronic data collection and field tablets to help crews better view, capture, and manage work. The tablets will allow crews the ability to locate outfalls and document illicit connections through GPS technology. This work will be coordinated with the City's Administrative Order (AO) and Corrective Action Plan (CAP) schedule as submitted to the EPA.

4. Construction Site Stormwater Runoff Control

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 13
4-1	By-law Review/Stormwater Ordinance	Stormwater Committee	Review/modify existing by-laws to ensure they adequately address permit requirements.	The City worked with their consulting engineer to develop and revisit the draft stormwater ordinance that failed to pass vote by the City council in March 2013 to include additional requirements related to Low Impact Development. An agreement was signed, draft ordinance updated, and submitted to DPI, the City's stormwater committee, the planning department, and City's solicitor's office for review and comment. Draft ordinance is in review and upon completion will be submitted to City council for vote.	Incorporate comments from various City departments and submit updated stormwater ordinance to the City Council for vote.

4-2	Subdivision Regulation Review	Planning Department	Review/Modify existing regulations to ensure they adequately address permit requirements	The City worked with their consulting engineer to develop and revisit the draft stormwater ordinance that failed to pass vote by the City council in March 2013 to include additional requirements related to Low Impact Development. An agreement was signed, draft ordinance updated, and submitted to DPI, the City's stormwater committee, the planning department, and City's solicitor's office for review and comment. Draft ordinance is in review and upon completion will be submitted to City council for vote.	Incorporate comments from various City departments and submit updated stormwater ordinance to the City Council for vote.
4-3	Zoning By-Law Review	Planning Department	Review/Modify existing regulations to ensure they adequately address permit requirements	The City worked with their consulting engineer to develop and revisit the draft stormwater ordinance that failed to pass vote by the City council in March 2013 to include additional requirements related to Low Impact Development. An agreement was signed, draft ordinance updated, and submitted to DPI, the City's stormwater committee, the planning department, and City's solicitor's office for review and comment. Draft ordinance is in review and upon completion will be submitted to City council for vote.	Incorporate comments from various City departments and submit updated stormwater ordinance to the City Council for vote.

4a. Additions

No Additions

5. Post-Construction Stormwater Management in New Development and Redevelopment

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 13
5-1	Bylaw review	Stormwater Committee	Review/Modify existing regulations to ensure they adequately address permit requirements	The City worked with their consulting engineer to develop and revisit the draft stormwater ordinance that failed to pass vote by the City council in March 2013 to include additional requirements related to Low Impact Development. An agreement was signed, draft ordinance updated, and submitted to DPI, the City's stormwater committee, the planning department, and City's solicitor's office for review and comment. Draft ordinance is in review and upon completion will be submitted to City council for vote.	Incorporate comments from various City departments and submit updated stormwater ordinance to the City Council for vote.
5-2	Subdivision Regulations Review	Planning Department	Review/Modify existing regulations to ensure they adequately address permit requirements	The City worked with their consulting engineer to develop and revisit the draft stormwater ordinance that failed to pass vote by the City council in March 2013 to include additional requirements related to Low Impact Development. An agreement was signed, draft ordinance updated, and submitted to DPI, the City's stormwater committee, the planning department, and City's solicitor's office for review and comment. Draft ordinance is in review and upon completion will be submitted to City council for vote.	Incorporate comments from various City departments and submit updated stormwater ordinance to the City Council for vote.

5-3	Zoning By-Law Review	Planning Department	Review/Modify existing regulations to ensure they adequately address permit requirements	The City worked with their consulting engineer to develop and revisit the draft stormwater ordinance that failed to pass vote by the City council in March 2013 to include additional requirements related to Low Impact Development. An agreement was signed, draft ordinance updated, and submitted to DPI, the City's stormwater committee, the planning department, and City's solicitor's office for review and comment. Draft ordinance is in review and upon completion will be submitted to City council for vote.	Incorporate comments from various City departments and submit updated stormwater ordinance to the City Council for vote.
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5a. Additions

DPI is responsible for the operation and maintenance of a number of retention/detention ponds and stormwater screens. In 2014, the City continued with actively maintaining 20 ponds including cleaning/clearing of outfall pipes, removal of sediment and debris from screens, and clearing of brush from ponds.

In 2015, the City will continue with these initiatives and incorporate preventive maintenance activities into the CMMS system.

6. Pollution Prevention and Good Housekeeping in Municipal Operations

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 12 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 13
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6-1	Protocol Implementation	Public Infrastructure	Implement preventive maintenance techniques.	Protocol implementation includes: 1. Preventive Maintenance Strategies – LTPMP formalized and submitted to EPA. SOPs have been formalized and adopted by the DPI. Incorporated acoustical technology into LTPMP. 2. CMMS system needs assessment completed. Hired software vendor who will implement system. Worked with consulting engineer to begin data capture. Budgeted for purchase of new tablets for electronic field data collection. 3. Budgeted for the purchase of new CCTV equipment, software, and manhole inspection equipment to link to GIS system to more efficiently capture and collect data related to condition of stormwater system. 4. City planted 467 trees. 5. Replaced 2,990 feet of ribbon sidewalk. 6. Sassaquin Pond – Conducted stormwater study. Attended neighborhood association meetings. Implemented source control measures. Installed 4 leaching catch basins /tree box filters to promote infiltration. 7. Vehicle Washing Activities – wash water is directed to sewer 8. Park and Landscape Maintenance – Coordinated with Buttonwood Park Zoo to address non-point source pollution prevention measures. Purchased \$4,400 in pet waste bags for placement at City parks.	1. Continue to develop SOPs related to maintenance of the system. 2. Continue to plant street trees. 3. Continue to improve city streets. 4. Continue Sassaquin Pond stormwater control measure improvements. 5. Continue to replace and maintain drain pipe in conjunction with sewer system maintenance. 6. Continue researching options and financing associated reconstruction of the City's Salt shed. 7. Continue with training related to use of new technology – CCTV, SL RAT, tablets. 8. Continue integrating stormwater and MS4 requirements into City's ongoing LTCP/Integrated Capital plan development. 9. Budget for a MS4 needs assessment to bench mark City's initiatives with current requirements and impending draft MS4 requirements. 10. Continue to maintain city streets and trash receptacles including enforcement actions as needed per City Code Sections 12 and 17.
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				9. Trash Cleanup – DPI actively maintained City trash receptacles. The City routinely conducts street sweeping and trash clean-up along City streets and in City owned property. Trash barrels are located within City streets and City owned property, which are emptied on a routine basis. Implemented “bin” system for trash collection City wide. 10. 20 Stormwater detention ponds maintained and inspected. 11. Illegal Dumping Controls – Section 12 of the City’s Ordinance Code provides for requirements for placement of litter and sweeping of litter into public streets. Fines are outlined within Section 17. 12. Stormdrain Maintenance – 10 repairs to storm drain pipes were made during this reporting period. Continued cleaning of blocked drain lines. Cleaned 20 retention ponds. Publically bid Coggeshall Street stormwater improvements (\$8M) and implemented outfall improvements at Coyne Laundry. 13. Sensitive Receptors – See Sassaquin Pond. 14. Storage of Sand and Salt – None to report. City researching options and financing for moving forward.	
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6-2	Annual Training	Public Infrastructure	Train staff on stormwater and pollution prevention techniques	Conducted training of City DPI staff related to CMOM program including: 1. NASSCO PACP and MACP training for proper inspection of pipelines and manholes to document condition and prioritize repairs. 2. Conducted workshops on GIS and CMMS systems to begin garnering input on needed improvements and needs of the Department.	Continue to conduct training related to the CMMS system and GIS systems including tablet technology, CCTV and manhole inspection software, job safety and training programs, and SOPs. Continue to attend vendor training on new equipment as upgrades are made.
6-3	Permit Filing	Public Infrastructure	Permits filed, as needed	For city projects, crews coordinated with the Conservation Commission prior to construction.	Continue coordinating with Conservation Commission.
6-4	Street Sweeping	Public Infrastructure	Sweep 2,600 miles annually	In calendar year 2014, City swept 8,526 miles of streets	Continue street sweeping program on an annual basis.
6-5	Catch Basin Cleaning	Public Infrastructure	Clean a minimum of 1,000 catch basins annually	In calendar year 2014, City cleaned 561 catch basins.	Continue to clean catch basins on an annual basis.
6-6	Pet Waste Collection	Public Infrastructure	Purchase pet waste collection bags	Purchased \$4,400 in pet waste collection bags for placement at various locations to mitigate non-point source pollution.	Continue to purchase pet waste collection bags.

6a. Additions

As part of the City's CMOM program, standard operating procedures (SOPs) were developed for inspection, operation, and maintenance of the City's collection system. SOPs for stormwater system inspection and maintenance will be coordinated with these efforts.

7. BMPs for Meeting Total Maximum Daily Load (TMDL) Waste Load Allocations (WLA)

Not Applicable

Part IV. Summary of Information Collected and Analyzed

The local Shellfish Constable, in conjunction with Massachusetts Division of Marine Fisheries staff, continue to conduct sampling within New Bedford's receiving waters with a minimum of 6 sampling events at 6 locations per event during the course of the year. Pending the results, additional samples may be collected. Twenty seven (27) sampling events were conducted during the 2014

calendar year. As a matter of protocol, should any sample reveal a higher than normal fecal coliform count, this event will trigger an investigation within the collection system until the problem is resolved.

The City, with the assistance of their on-call consulting engineer, updated the previous draft stormwater ordinance to include Low Impact Development (LID) requirements for redevelopment and development projects. This updated ordinance is now being reviewed by various City departments including the City Solicitor's Office. Once comments are incorporated, the updated ordinance will be submitted to City Council for approval. A public meeting is planned related to outreach efforts prior to promulgation which is being coordinated through the Planning Department.

The current stormwater program is being coordinated closely with the City's CMOM program and AO activities related to asset management and business practice improvements. In addition, as part of the City's proposed development of an Integrated Municipal Stormwater and Wastewater Plan, alternatives and recommendations will be developed in context with current MS4 permitting requirements.

Part V. Program Outputs & Accomplishments (OPTIONAL)

Programmatic

Stormwater management position created/staffed	(y/n)	yes
Annual program budget/expenditures	(\$)	

Education, Involvement, and Training

Estimated number of residents reached by education program(s)	(# or %)	
Stormwater management committee established	(y/n)	
Stream teams established or supported	(# or y/n)	
Shoreline clean-up participation or quantity of shoreline miles cleaned	(y/n or mi.)	
Household Hazardous Waste Collection Days		
▪ days sponsored	(#)	
▪ community participation	(%)	
▪ material collected	(tons or gal)	
School curricula implemented	(y/n)	

Legal/Regulatory

	In Place Prior to Phase II	Under Review	Drafted	Adopted
Regulatory Mechanism Status (indicate with "X")				
▪ Illicit Discharge Detection & Elimination				
▪ Erosion & Sediment Control				
▪ Post-Development Stormwater Management				
Accompanying Regulation Status (indicate with "X")				
▪ Illicit Discharge Detection & Elimination				
▪ Erosion & Sediment Control				
▪ Post-Development Stormwater Management				

Mapping and Illicit Discharges

Outfall mapping complete	(%)	
Estimated or actual number of outfalls	(#)	
System-Wide mapping complete	(%)	
Mapping method(s)		
▪ Paper/Mylar	(%)	
▪ CADD	(%)	
▪ GIS	(%)	
Outfalls inspected/screened	(# or %)	
Illicit discharges identified	(#)	
Illicit connections removed	(#) (est. gpd)	
% of population on sewer	(%)	
% of population on septic systems	(%)	

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Construction

Number of construction starts (>1-acre)	(#)	
Estimated percentage of construction starts adequately regulated for erosion and sediment control	(%)	
Site inspections completed	(# or %)	
Tickets/Stop work orders issued	(# or %)	
Fines collected	(# and \$)	
Complaints/concerns received from public	(#)	

Post-Development Stormwater Management

Estimated percentage of development/redevelopment projects adequately regulated for post-construction stormwater control	(%)	
Site inspections completed	(# or %)	
Estimated volume of stormwater recharged	(gpy)	

Operations and Maintenance

Average frequency of catch basin cleaning (non-commercial/non-arterial streets)	(times/yr)	
Average frequency of catch basin cleaning (commercial/arterial or other critical streets)	(times/yr)	
Total number of structures cleaned	(#)	
Storm drain cleaned	(LF or mi.)	
Qty. of screenings/debris removed from storm sewer infrastructure	(lbs. or tons)	
Disposal or use of sweepings (landfill, POTW, compost, recycle for sand, beneficial use, etc.)		
Cost of screenings disposal	(\$)	

Average frequency of street sweeping (non-commercial/non-arterial streets)	(times/yr)	
Average frequency of street sweeping (commercial/arterial or other critical streets)	(times/yr)	
Qty. of sand/debris collected by sweeping	(lbs. or tons)	
Disposal of sweepings (landfill, POTW, compost, beneficial use, etc.)	(location)	
Cost of sweepings disposal	(\$)	
Vacuum street sweepers purchased/leased	(#)	
Vacuum street sweepers specified in contracts	(y/n)	

Reduction in application on public land of: ("N/A" = never used; "100%" = elimination)		
▪ Fertilizers	(lbs. or %)	
▪ Herbicides	(lbs. or %)	
▪ Pesticides	(lbs. or %)	

Anti-/De-Icing products and ratios	% NaCl % CaCl ₂ % MgCl ₂ % CMA % Kac % KCl % Sand	
Pre-wetting techniques utilized	(y/n)	
Manual control spreaders used	(y/n)	
Automatic or Zero-velocity spreaders used	(y/n)	
Estimated net reduction in typical year salt application	(lbs. or %)	
Salt pile(s) covered in storage shed(s)	(y/n)	
Storage shed(s) in design or under construction	(y/n)	