

# Town of Leesburg, Virginia

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## Municipal Separate Storm Sewer System (MS4) Program Plan

Final Submittal to the  
Virginia Department of Environmental Quality  
October 1, 2014

PY3 Update – October 1, 2016



Department of Public Works  
25 West Market Street, Leesburg, VA 20178  
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Submitted to the Virginia Department of Environmental Quality in  
compliance with Permit No. VAR040059

DRAFT



# Town of Leesburg Municipal Separate Storm Sewer System (MS4) Program Plan

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## **Appendices**

- A. Public Education and Outreach Plan**
- B. Illicit Discharge Detection and Elimination Plan**
- C. Construction Site and Post-Construction Stormwater Management Procedures**
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- E. TMDL Action Plans**

## 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."

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Name	Title	Date
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## Town of Leesburg Municipal Separate Storm Sewer System (MS4) Program Plan

### A. Introduction

This MS4 Program Plan (plan) documents how the Town of Leesburg will meet the requirements of 9VAC25-890-40 Virginia Pollutant Discharge Elimination System (VPDES) General Permit for Discharges of Stormwater from Small Municipal Separate Storm Sewer Systems (MS4s). The Town was originally issued an MS4 permit effective July 8, 2003 (Permit No. VAR040059). The MS4 permit was re-issued on July 9, 2008 and then again on July 8, 2013. The current five-year permit will expire on June 30, 2018.

Mandated by Congress under the Clean Water Act and implemented in Virginia by the Department of Environmental Quality (DEQ), the MS4 permit is designed to protect water quality from urban stormwater pollution. Stormwater runoff from urban areas may contain sediments, fertilizers, pesticides, bacteria, motor oil, and other pollutants generated by various land uses and human activities. When left uncontrolled, this pollution can result in the impairment or destruction of aquatic habitats, a loss in aesthetic value, and threats to public safety and health.

To achieve these water quality goals, the MS4 permit requires the Town to control the discharge of pollutants to the maximum extent practicable (MEP) by addressing six minimum control measures (MCMs).

Six Minimum Control Measures	
1. Public Education and Outreach on Stormwater Impacts	4. Construction Site Stormwater Runoff Control
2. Public Involvement/Participation	5. Post-Construction Stormwater Management
3. Illicit Discharge Detection and Elimination	6. Pollution Prevention/Good Housekeeping for Municipal Operations

While the basic framework of the permit has not changed, several new requirements necessitate changes to the MS4 Program Plan and overall Town stormwater operations. The most challenging condition is the requirement to develop action plans to address pollutants allocated to the Town in approved Total Maximum Daily Loads (TMDLs). A TMDL establishes the maximum amount of a pollutant that can enter a water body without violating water quality

standards. The TMDL action plans become part of the MS4 Program Plan following their development and submittal to DEQ. The following table provides the schedule of MS4 Program Plan updates that must be completed by the Town.

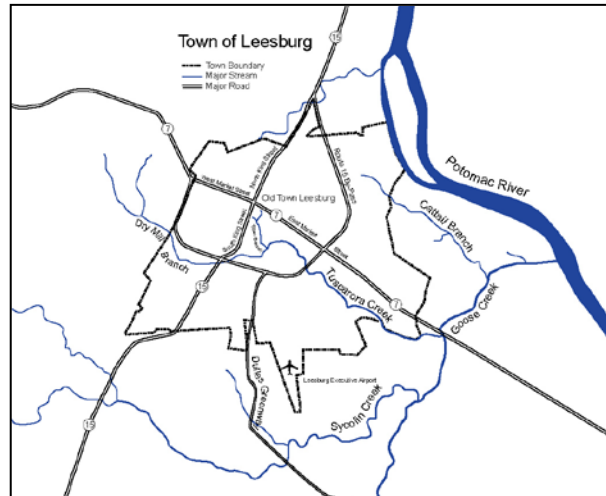
<b>Schedule of MS4 Program Plan Updates</b>		
<b>Update Requirement</b>	<b>Due Date</b>	<b>Program Plan Reference</b>
Public Education Outreach Plan	June 30, 2014	See MCM #1 "Program Plan Update Requirement" and Appendix A.
Illicit Discharge Procedures	June 30, 2014	See MCM #2 "Program Plan Update Requirement" and Appendix B.
Operator Owned Stormwater Management Inspection Procedures	June 30, 2014	See MCM #5 "Program Plan Update Requirement" and Appendix C.
Single Family Stormwater Management Special Criteria	June 30, 2014	See MCM #5 "Program Plan Update Requirement – Individual Residential Lot Special Criteria."
Stormwater Pollution Prevention Plan (SWPPP) Locations	June 30, 2014	See MCM #6, BMP 6.G.
Nutrient Management Plan (NMP) Locations	June 30, 2014	See MCM #6, BMP 6.C.
Training Schedule and Program	June 30, 2014	See MCM #6, BMP 6.D, 6.E, and 6.F.
Stormwater Management Compliance and Enforcement	June 30, 2015	See MCM #5 "Program Plan Update Requirement."
Daily Good Housekeeping Procedures	June 30, 2015	See MCM #6, BMP 6.H and Appendix D.
Outfall Map Completed	June 30, 2017	See MCM #3, BMP 3.A.
Full SWPPP Implementation	June 30, 2017 with milestones	See MCM #6, BMP 6.G.
Full NMP Implementation	June 30, 2018 with milestones	See MCM #6, BMP 6.C.
<b>TMDL Action Plans</b>	<b>Due Date</b>	<b>Program Plan Reference</b>
Updated TMDL Action Plans (TMDLs approved before July 2008)	June 30, 2015	See Section D.
Chesapeake Bay TMDL Action Plan	June 30, 2015	See Section D and Appendix E.
Other TMDL Action Plans (TMDLs approved July 2008 - June 2013)	June 30, 2016	See Section D and Appendix E.



The Town has engaged in an extensive review and assessment of existing stormwater management operations, ordinances, protocols, and programming against the MS4 permit compliance requirements. Based on that review and assessment, the Town has developed appropriate and cost effective best management practices (BMPs) with the goal of controlling pollution to the maximum extent practicable. This plan incorporates the specific actions that have been completed from Permit Year 1 (PY1) through PY3, and establishes general schedules for completing future annual updates required in PY4 and PY5.

## B. Community Profile

The Town of Leesburg was founded in 1758 and serves as the center of government and commerce for Loudoun County. The Town has a land area of 12.47 square miles. To the west of the Town are the foothills of the Blue Ridge Mountains. Limestone conglomerate underlies the northern area of Leesburg, which may limit appropriate stormwater management facilities since the carbonate rock is prone to the formation of sinkholes. The great majority of the Town is located within the Goose Creek watershed, with most of the Town drained by Tuscarora Creek. Areas to the north drain to Cattail Branch, while areas to the south drain to Sycolin Creek. The Virginia Department of Environmental Quality maintains an ambient water quality monitoring station on Tuscarora Creek near its confluence with Goose Creek.



**Figure 1: Streams of Leesburg**

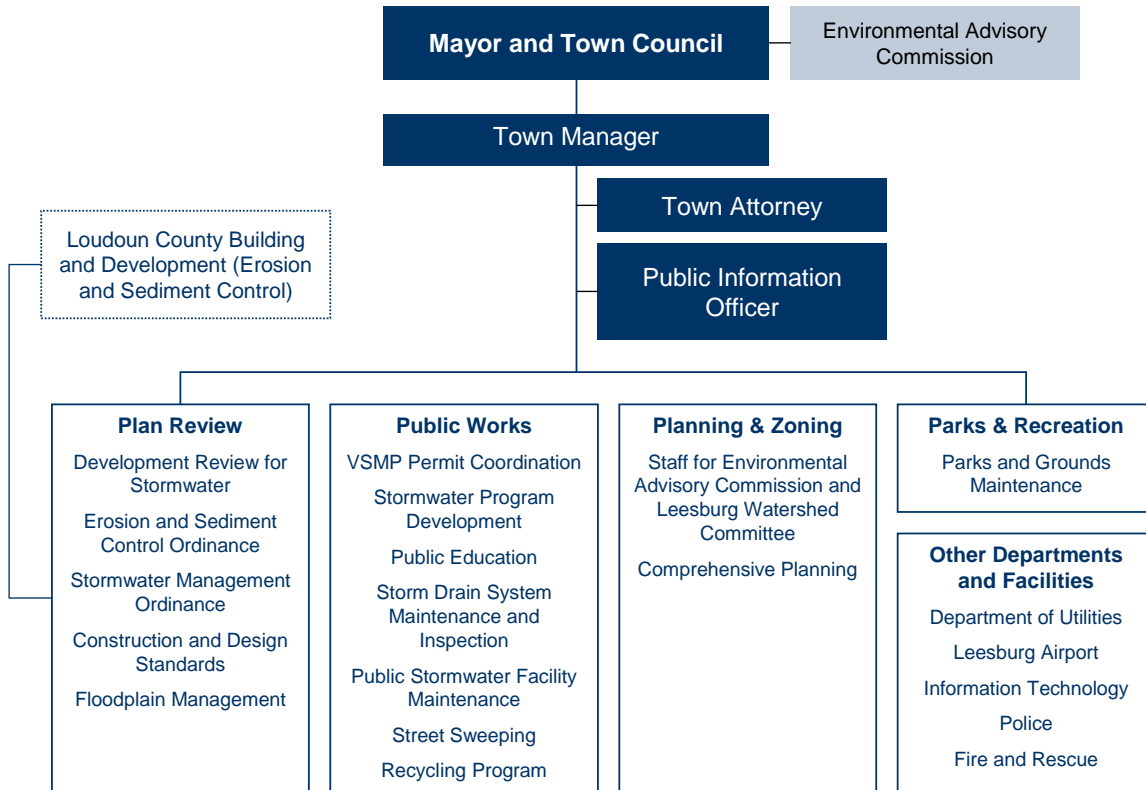
Leesburg has experienced significant growth over the past two decades. According to U.S. Census estimates, the population of the Town grew from 28,311 in the year 2000 to 49,496 in the year 2014 – a 75% increase in only 14 years. The Metropolitan Washington Council of Governments anticipates that the Town will continue to grow and will have a population of over 61,000 by the year 2030. The Town's population is relatively young, with approximately 30.2% of residents being under the age 20. The median age of a Town resident is 33.8. Approximately 66% of the Town's housing stock (15,119 units as of 2010) consists of single family detached homes. This indicates that a large number of residents are responsible for making decisions concerning the application of pesticides and fertilizers.

Residents of the Town are highly educated, with approximately 65% holding a Bachelor's Degree or higher. The large majority of residents in the Town and in Loudoun County are also technology-savvy, with a May 2008 survey conducted by the County indicating that 92% of residents have access to the internet at home. As a result, there is a great deal of potential in using the internet as an education and outreach tool.

## C. Leesburg’s Stormwater Management Program

The Department of Public Works (DPW) is responsible for coordinating the Town’s MS4 permit and for implementing a majority of the permit requirements. In addition to DPW, departments with significant stormwater management responsibilities include: Plan Review; Planning and Zoning; Parks and Recreation; Utilities; Information Technology; Police; and, Fire and Rescue.

**Figure 2: Town of Leesburg Stormwater Management Organizational Structure**



**Department of Public Works and Capital Projects.** DPW is responsible for stormwater planning/operations and administers the Town’s MS4 permit. DPW crews are responsible for maintaining the Town’s stormwater management infrastructure, including pipes, curb and gutter, and public stormwater management facilities. The crews have access to a Vac-Con truck for litter and debris removal as well as an inspection camera in the case of a suspected illicit connection. DPW is responsible for inspecting public and private stormwater management facilities and also handles street sweeping operations. The Town owns one street sweeper. In addition to direct stormwater management, the Town uses a contractor to collect refuse, recyclable materials, and yard waste from residents. The Street Maintenance Division collects brush weekly and offers curbside pickup of loose leaves with the vacuum truck every October through January. The Town maintains one recycling drop-off center and is currently seeking a site to place a second center. The Town also encourages residents to take used motor oil and antifreeze to the Loudoun County landfill.

**Department of Plan Review.** Plan Review is responsible for development review and ensuring that site plans are in compliance with the Town's Stormwater Management Ordinance and Erosion and Sediment Control Ordinance. The Director of Plan Review serves as the Town's land development official. The Town has a formal memorandum of understanding (MOU) with Loudoun County Building and Development to enforce the Erosion and Sediment Control Ordinance, although DPW staff maintains certification by DEQ to supplement enforcement activities if necessary.

**Department of Planning and Zoning.** DPZ is responsible for overall land use and natural resources planning as well as zoning. DPZ also provides staff support to the Town's Environmental Advisory Commission and the Leesburg Watershed Committee.

**Department of Parks and Recreation.** P&R is responsible for maintenance of Town parks, sponsors a number of annual and special events, and engages in environmentally-friendly programming. P&R hosts the annual Leesburg Flower and Garden Festival and coordinates an Adopt-A-Spot program. Because maintenance of large areas of landscaping has the potential to negatively affect water quality, P&R maintains a Community Applicators License, requires training of applicators by the state, and has developed a nutrient management plan.



**Leesburg's Camera Truck**

**Department of Utilities.** The Department of Utilities is responsible for maintenance and operation of the Town's sanitary sewer system. In addition to collaborating with DPW on potential illicit connection issues, DPW uses camera equipment from Utilities to find suspected illicit discharges. The Water Pollution Control Facility is in full compliance with a separate VPDES industrial stormwater permit (VAR051427). The WPCF is co-located with the Central Maintenance Facility, and both are covered under a consolidated stormwater pollution prevention plan (SWPPP).

**Information Technology.** IT houses the Town's Graphic Information System (GIS) Coordinator, who is responsible for the maintenance of the Town's digital mapping, including mapping of the Town's stormwater management infrastructure. IT is also responsible for development and maintenance and oversight of the Town's website. The Department of Public Works maintains responsibility for its portion of the website, including the stormwater pages.

**Other Relevant Organizations.** Leesburg Executive Airport is owned by the Town and is governed by a Town-appointed board. The Airport is in full compliance with a separate VPDES industrial stormwater permit (VAR051426). Leesburg Fire and Rescue and the Town Police respond to and mitigate hazardous material incidents and spills, including those that have the potential to affect water resources in the Town. The Town is a member of the Loudoun County

Soil and Water Conservation District and the Northern Virginia Regional Commission. Town staff coordinates with the LCSWCD on local education and outreach efforts and participates in NVRC’s regional education and outreach efforts.

The following acronyms and abbreviations are used in this plan:

- DPW ..... Department of Public Works
- DPR ..... Department of Plan Review
- PIO..... Public Information Officer
- P&R ..... Department of Parks and Recreation
- DPZ..... Department of Planning and Zoning
- IT..... Information Technology
- Utilities ..... Department of Utilities
- LCSWCD ..... Loudoun County Soil and Water Conservation District
- NVRC..... Northern Virginia Regional Commission
- EAC.....Environmental Advisory Commission

## **D. Special Conditions for Approved TMDLs**

While the focus of the MS4 permit is on prevention, the permit contains special conditions that require the Town to develop and implement “action plans” to address impaired waters where a Total Maximum Daily Load (TMDL) wasteload allocation (WLA) has been approved by the State Water Control Board (SWCB) and assigned to the Town. A TMDL establishes the maximum amount of a pollutant that can enter a water body without violating water quality standards.

The Town developed a Chesapeake Bay TMDL Action Plan and submitted it to DEQ with the PY2 annual report. The action plan was subsequently approved by DEQ. The action plan addresses pollutant reductions for total nitrogen, total phosphorus, and sediment. The plan calculates existing and target loads provided in the MS4 permit, and identifies the means and methods to meet the target loads. The Town must implement the means and methods to meet the pollutant reductions by the end of the MS4 permit cycle (June 30, 2018).

The Town is also subject to two TMDLs developed for Goose Creek. The Goose Creek bacteria TMDL was developed in 2003 and approved by the SWCB in June 2004. The Goose Creek sediment TMDL was approved by the SWCB in August 2004. Since the development of the Goose Creek bacteria TMDL predates the original issuance of an MS4 permit to the Town, there is no WLA assigned to the Town’s MS4 permit. However, the Town has integrated best management practices (BMPs) into Section E to reduce anthropogenic sources of bacteria pollution to the maximum extent practicable.

The Goose Creek sediment TMDL does contains a WLA assigned to the Town's MS4 permit. The Town developed a Goose Creek Sediment TMDL Action Plan and submitted it to DEQ with the PY2 annual report. The action plan was subsequently approved by DEQ.

Both the Chesapeake Bay TMDL Action Plan and the Goose Creek Sediment TMDL Action Plan have been integrated into this MS4 Program Plan and are included in Appendix E.

## E. Minimum Control Measures

The following sections describe the BMPs that the Town will utilize and implement to meet each of the six minimum control measures. Included with each MCM section is a description of the associated MS4 Program Plan update outlined in Section A "Schedule of MS4 Program Plan Updates," if applicable, and the specific BMPs to be implemented. Included with each BMP is a description of:

- The objective and expected results of each BMP in meeting the measurable goals of the minimum control measure.
- The implementation schedule for the proposed BMP.
- Parties responsible for BMP implementation.
- The method that will be used to document BMP implementation, including policies, ordinances, schedules, inspection forms, written procedures, and other documentation necessary to determine the effectiveness of the BMP.

After each section is a table that summarizes the schedule for implementing the BMPs.

<b>MCM #1: Public Education and Outreach on Stormwater Impacts</b>
<p>Permit Reference: Section II B. 1</p> <p><u>Relevant Excerpts:</u></p> <p><i>b. The public education and outreach program should be designed with consideration of the following goals:</i></p> <p><i>(1) Increasing target audience knowledge about the steps that can be taken to reduce stormwater pollution, placing priority on reducing impacts to impaired waters and other local water pollution concerns;</i></p> <p><i>(2) Increasing target audience knowledge of hazards associated with illegal discharges and improper disposal of waste, including pertinent legal implications; and</i></p> <p><i>(3) Implementing a diverse program with strategies that are targeted towards audiences most likely to have significant stormwater impacts.</i></p> <p><i>c. The updated program shall be designed to:</i></p> <p><i>(1) Identify, at a minimum, three high-priority water quality issues, that contribute to the discharge of stormwater (e.g., Chesapeake Bay nutrients, pet wastes and local bacteria TMDLs, high-quality receiving waters, and illicit discharges from commercial sites) and a rationale for the selection of the three high-priority water quality issues;</i></p> <p><i>(2) Identify and estimate the population size of the target audience or audiences who is most likely to</i></p>



### **MCM #1: Public Education and Outreach on Stormwater Impacts**

*have significant impacts for each high-priority water quality issue;*

*(3) Develop relevant message or messages and associated educational and outreach materials (e.g., various media such as printed materials, billboard and mass transit advertisements, signage at select locations, radio advertisements, television advertisements, websites, and social media) for message distribution to the selected target audiences while considering the viewpoints and concerns of the target audiences including minorities, disadvantaged audiences, and minors;*

*(4) Provide for public participation during public education and outreach program development;*

*(5) Annually conduct sufficient education and outreach activities designed to reach an equivalent 20% of each high-priority issue target audience. It shall not be considered noncompliance for failure to reach 20% of the target audience. However, it shall be a compliance issue if insufficient effort is made to annually reach a minimum of 20% of the target audience; and*

*(6) Provide for the adjustment of target audiences and messages including educational materials and delivery mechanisms to reach target audiences in order to address any observed weaknesses or shortcomings*

### **Program Plan Update Requirement**

The Town has developed a Public Education and Outreach Plan (PEOP) in accordance with the requirements found in Section II.B.1 of the MS4 permit. The PEOP is included as Appendix A. Strategies and BMPs for MCM #1 were chosen with the intent to engage a minimum of 20% of each target audience annually for selected high-priority water quality issues. High-priority water quality issues identified in the PEOP are bacteria from pets, illicit discharges and illegal dumping, and nutrients from lawn fertilizers. The following BMPs will be implemented in accordance with the permit and the PEOP.

### **BMP 1.A – General Pollution Prevention Education and Outreach**

**Objective and Expected Results:** A broad-based public outreach strategy serves to educate residents about why it is important to reduce stormwater pollution and what personal actions can be taken to have a positive impact on the Chesapeake Bay and the Town's local waterways. A focus of the Town's efforts is on educating school-age youth. The Town has initiated a number of efforts to work with individual schools on specific projects and has partnered with the Loudoun County Soil and Water Conservation District (LCSWCD), Loudoun Watershed Watch, and Loudoun County Youth Programs (LCYP). In addition, the Town has partnered with other MS4 localities through the Northern Virginia Regional Commission (NVRC) Clean Water Partners program to deliver public education on a regional basis, including radio, television, and social media.

#### **Implementation Schedule:**

- Participate in the NVRC Clean Water Partners program.
- Beginning PY2, annually incorporate a short message on pollution prevention on one of the Town's social media accounts (currently Facebook and Twitter). Messages will be coordinated with BMPs 1.B, 1.C, and 1.D.
- Distribute educational materials at appropriate events and meetings.
- Host the stormwater webpage and update it with new information as applicable.

- Collaborate with local schools and youth organizations to educate school-age children. Partnering opportunities include, but are not limited to, LCSWCD and local non-profit and community organizations.
- Distribute information on pollution prevention during the annual Flower and Garden Festival in April each year. The Environmental Advisory Commission hosts a booth and is available to answer questions and provide handouts on environmental issues such as stormwater pollution prevention.
- Advertise the storm drain marking program (BMP 3.H) on the Town's government access channels.

**Responsible Parties:** DPW will lead this effort with support from the PIO, and IT. DPW will interface with LCSWCD and local non-profit and community organizations. NVRC Clean Water Partners will act as the Town's regional partner.

**Documentation and Evaluation Criteria:** The Town will document efforts to engage and educate residents and will report these efforts in the annual report. The Town will provide a summary of the NVRC Clean Water Partners program regional efforts and the results of any surveys or other mechanisms used to evaluation effectiveness.

### **BMP 1.B – Bacteria from Pet Waste**

**Objective and Expected Results:** The purpose of this BMP is to educate residents in general, and pet owners specifically, on the impacts of pet waste on water quality and the importance of picking up after pets.

**Implementation Schedule:** All residents, and especially pet owners, have been identified as the target audience for this effort.

- Beginning PY2, annually mail a postcard containing a bacteria-related message to all single family and town homes.
- Beginning PY2, annually mail information to the Town's HOAs and property management companies about strategies to prevent bacteria pollution.
- Beginning PY2, promote the PAWS for Clean Water initiative that encourages responsible pet ownership using a voluntary pledge that owners will pick up after their pets.
- Participate in the NVRC Clean Water Partners regional program to reduce water quality impacts from bacteria in pet waste.

**Responsible Parties:** DPW will lead the effort, with support from the PIO and IT. NVRC Clean Water Partners will act as the Town's regional partner.

**Documentation and Evaluation Criteria:** The Town will document these efforts in the annual report. The following provides the Town's plan for meeting the requirement to reach a minimum of 20% of the target audiences annually in accordance with the PEOP.

Target Audience	Strategy	Strategy Reach	Percent Target Reached Annually
All Households	Direct mail postcard.	Town-wide.	100% of single-family and town home households annually.
	NVRC Clean Water Partners.	Town-wide	To be determined based on NVRC annual statistics. 15% of general population reached in FY14 according to NVRC survey.
	Direct mail.	35 HOAs/property management companies.	100% of HOAs/property management companies annually.
Dog Owners	Online PAWS Program	Dog owners.	To be determined based on pledges received.

**BMP 1.C – Illicit Discharges and Illegal Dumping**

**Objective and Expected Results:** The purpose of this BMP is to educate residents in general on the impacts of illicit discharges and illegal dumping on water quality, including how to identify and report a suspected illicit discharge. This BMP also aims to use education as a way to reduce the discharge of cooking oils and grease from restaurants.

**Implementation Schedule:** All residents and restaurants have been identified as the target audiences for this effort.

- Beginning PY2, annually mail a postcard containing a message related to illicit discharge detection and illegal dumping to all single family and town homes.
- Beginning PY2, annually mail information to the Town’s HOAs and property management companies about strategies to prevent illicit discharges and illegal dumping.
- Beginning PY2, annually mail a letter and tip sheet to 25% of restaurants about the impact of cooking oils and grease on water quality and the legal ramifications of non-compliance.
- Participate in the NVRC Clean Water Partners program to reduce water quality impacts from illicit discharges and illegal dumping.
- Promote Loudoun County’s Hazardous Household Waste (HHW) program via web page, press releases, or social media in accordance with BMP 3.G.

**Responsible Parties:** DPW will lead the effort, with support from the PIO and IT. NVRC Clean Water Partners will act as the Town’s regional partner.

**Documentation and Evaluation Criteria:** The Town will document these efforts in the annual report. The following provides the Town’s plan for meeting the requirement to reach a minimum of 20% of the target audiences annually in accordance with the PEOP.





Target Audience	Strategy	Strategy Reach	Percent Target Reached Annually
All Households	Promote Loudoun County HHW program via webpage and press releases and notices on social media accounts.	Town-wide.	To be determined based on number of followers on social media accounts; web hits.
	Direct mail postcard.	Town-wide.	100% of single-family and town home households annually.
	NVRC Clean Water Partners.	Town-wide.	To be determined based on NVRC annual statistics. 15% of general population reached in FY14 according to NVRC survey.
	Direct mail.	35 HOAs/property management companies.	100% of HOAs/property management companies annually.
Restaurants	Letter and flyers or newsletters with information on the negative impacts of illicit discharges and illegal dumping as well as Town Code penalties for violations.	Approx. 150 restaurants.	25% annually.

**BMP 1.D – Nutrients**

**Objective and Expected Results:** The purpose of this BMP is to educate single family and town home residents, HOAs and property management companies, and landscape companies about how to reduce the impacts of excess nutrients on local water quality and the Chesapeake Bay.

**Implementation Schedule:**

- Beginning PY2, annually mail a postcard containing a message related to proper use of fertilizers to all single family and town homes.
- Beginning PY2, annually mail information to the Town’s HOAs and property management companies about strategies to prevent nutrient pollution.
- Beginning PY2, annually mail a letter and tip sheet to 25% of landscape companies about the impact of nutrient pollution on water quality and the legal ramifications of not meeting state nutrient management requirements.
- Participate in the NVRC Clean Water Partners program to reduce water quality impacts from excess nutrients.

**Responsible Parties:** DPW will lead this effort with support from the PIO, and IT. NVRC Clean Water Partners will act as the Town’s regional partner.

**Documentation and Evaluation Criteria:** The Town will document these efforts in the annual report. The following provides the Town’s plan for meeting the requirement to reach a minimum of 20% of the target audiences annually in accordance with the PEOP.



Target Audience	Strategy	Strategy Reach	Percent Target Reached Annually
All Households	Direct mail postcard.	Town-wide.	100% of single-family and town home households annually.
	NVRC Clean Water Partners.	Town-wide.	To be determined based on NVRC annual statistics. 15% of general population reached in FY14 according to NVRC survey.
	Direct mail.	35 HOAs/property management companies.	100% of HOAs/property management companies annually.
Landscape Companies	Letter and flyers or newsletters with information on strategies to reduce nutrients from landscape management activities.	12-15 landscape companies.	25% annually.

MCM #1 Implementation Schedule							
BMP	Task	Year(s) to Implement					Responsibility
		PY1	PY2	PY3	PY4	PY5	
1.A	Participate in the NVRC Clean Water Partners program.	▶	▶	▶	▶	▶	DPW, NVRC
	Incorporate a short message on pollution prevention on a Town social media account.		▶	▶	▶	▶	DPW, PIO, IT
	Distribute educational materials at appropriate local events and meetings.	▶	▶	▶	▶	▶	DPW, PIO
	Host the stormwater webpage and update it with new information as applicable.	▶	▶	▶	▶	▶	DPW, PIO, IT
	Reach out to local schools and organizations on opportunities to educate school-age youth.	▶	▶	▶	▶	▶	DPW, PIO
	Distribute information on pollution prevention during the annual Flower & Garden Festival.	▶	▶	▶	▶	▶	DPW, EAC
	Advertise storm drain marking program.	▶	▶	▶	▶	▶	DPW
1.B	Mail a postcard to all single		▶	▶	▶	▶	DPW

MCM #1 Implementation Schedule							
	family / town home residents on bacteria.						
	Mail information to HOAs and property management companies on bacteria.		▶	▶	▶	▶	DPW
	Promote the PAWS for Clean Water initiative.		▶	▶	▶	▶	DPW, PIO
	Participate in the NVRC Clean Water Partners program.	▶	▶	▶	▶	▶	DPW, NVRC
1.C	Mail postcard to all single family / town home residents on illicit discharges.		▶	▶	▶	▶	DPW
	Mail information to HOAs and property management companies on illicit discharges.		▶	▶	▶	▶	DPW
	Mail letter and tip sheet to 25% of restaurants annually.		▶	▶	▶	▶	DPW
	Participate in the NVRC Clean Water Partners program.	▶	▶	▶	▶	▶	DPW, NVRC
	Promote Loudoun County HHW program.	▶	▶	▶	▶	▶	DPW, PIO
1.D	Mail a postcard to all single family / town home residents on nutrients.		▶	▶	▶	▶	DPW
	Mail information to HOAs and property management companies on nutrients.		▶	▶	▶	▶	DPW
	Mail letter and tip sheet to 25% of landscape companies annually.		▶	▶	▶	▶	DPW
	Participate in the NVRC Clean Water Partners program.	▶	▶	▶	▶	▶	DPW, NVRC

## MCM #2: Public Involvement and Participation

Permit Requirement: Section II B. 2.

### Relevant Excerpts:

*a. Public involvement.*

*(1) The operator shall comply with any applicable federal, state, and local public notice requirements.*

*(2) The operator shall:*

*(a) Maintain an updated MS4 Program Plan. Any required updates to the MS4 Program Plan shall be completed at a minimum of once a year and shall be updated in conjunction with the annual report. The operator shall post copies of each MS4 program plan on its webpage at a minimum of once a year and within 30 days of submittal of the annual report to the department.*

*(b) Post copies of each annual report on the operator's web page within 30 days of submittal to the department and retain copies of annual reports online for the duration of this state permit; and*

*(c) Prior to applying for coverage as required by Section III M, notify the public and provide for receipt of comment of the proposed MS4 Program Plan that will be submitted with the registration statement. As part of the reapplication, the operator shall address how it considered the comments received in the development of its MS4 Program Plan. The operator shall give public notice by a method reasonably calculated to give actual notice of the action in question to the persons potentially affected by it, including press releases or any other forum or medium to solicit public participation.*

*b. Public participation. The operator shall participate, through promotion, sponsorship, or other involvement, in a minimum of four local activities annually e.g., stream cleanups; hazardous waste cleanup days; and meetings with watershed associations, environmental advisory committees, and other environmental organizations that operate within proximity to the operator's small MS4. The activities shall be aimed at increasing public participation to reduce stormwater pollutant loads; improve water quality; and support local restoration and clean-up projects, programs, groups, meetings, or other opportunities for public involvement.*

### **BMP 2.A – Public Notice and Participation**

**Objective and Expected Results:** Providing an opportunity for public input and engagement will allow the Town to take advantage of the expertise of residents and strengthen public understanding and support for the program. The Town is committed to meeting and exceeding all public notice and comment requirements.

### **Implementation and Schedule:**

- Meet all legal obligations with respect to public notice and comment.
- Post each updated MS4 Program Plan to the stormwater webpage within 30 days of submittal of the annual report to DEQ.
- Post each annual report on the stormwater webpage within 30 days of submittal to DEQ and retain copies of each annual report online for the duration of the permit.
- Prior to reapplication for renewed permit coverage in PY5, notify the public and provide for comment on the proposed MS4 Program Plan to be provided with the registration statement.

**Responsible Party:** DPW will take the lead on this effort with the support from the PIO, IT, and the Town Manager's Office.

**Documentation and Measure of Effectiveness:** The Town will provide documentation of compliance with the public participation requirements, including appropriate webpage links to the MS4 Program Plan and annual reports.

### **BMP 2.B – Environmental Advisory Commission**

**Objective and Expected Results:** Direct citizen input can strengthen the overall program by providing the Town with feedback on the effectiveness of pollution prevention efforts from a citizen perspective. The Environmental Advisory Commission is appointed by the Town Council to promote the environmental interests of the Town. EAC meetings are open to the public and provide a valuable forum to share information. Representatives of DPW meet annually with the EAC.

**Implementation Schedule:** Meet with the EAC annually to discuss MS4 Program Plan implementation and what pollution prevention information will be included at the EAC's booth at the annual Flower & Garden Festival. The EAC hosts a booth and DPW provides the EAC with giveaways and handouts that carry messages on preventing and/or reducing stormwater pollution.

**Responsible Party:** DPW will take the lead on this effort in cooperation with DPZ.

**Documentation and Evaluation Criteria:** The Town will provide documentation of meetings with the EAC. Feedback from the EAC will be documented and used by DPW to strengthen the program.

### **BMP 2.C – Promote and Support Local Activities**

**Objective and Expected Results:** There are many organizations in the Town and surrounding areas that provide residents with an opportunity to become involved in local clean-up and pollution prevention efforts. The Town has developed guidelines for promoting events, which are found on the Town's website.

**Implementation Schedule:**

- Beginning PY2, participate in a minimum of four local activities annually through sponsorship or promotion.
- Continue to include guidelines on the webpage for submitting a request for the Town to promote a volunteer activity.

**Responsible Party:** DPW will take the lead on this effort in coordination with the PIO and IT.

**Documentation and Evaluation Criteria:** Each annual report will provide a summary of the local activities for which the Town participated through promotion, sponsorship, or direct involvement. The summary will include the name of the activity, the date, the number of volunteers, participating groups, and a measure of the activity such as number of bags of trash collected, if applicable.

MCM #2 Implementation Schedule							
BMP	Task	Year(s) to Implement					Responsibility
		PY1	PY2	PY3	PY4	PY5	
2.A	Meet all public notice obligations.	▶	▶	▶	▶	▶	DPW, PIO, Town Manager
	Post each updated MS4 Program Plan to the webpage within 30 days of submittal of the annual report.	▶	▶	▶	▶	▶	DPW, PIO, IT
	Post the annual report on the webpage within 30 days of submittal to DEQ.	▶	▶	▶	▶	▶	DPW, PIO, IT
	Prior to reapplication for renewed permit coverage, provide for comment on the proposed MS4 Program Plan.					■	DPW, Town Manager, PIO
2.B	Environmental Advisory Commission meeting.	▶	▶	▶	▶	▶	DPW, DPZ
2.C	Promote/participate in four local activities.		▶	▶	▶	▶	DPW, PIO, IT
	Continue to include guidelines for promoting volunteer opportunities on the web page.	▶	▶	▶	▶	▶	DPW, PIO, IT

### MCM #3: Illicit Discharge Detection and Elimination

Permit Reference: Section II B. 3

Relevant Excerpts:

*a. The operator shall maintain an accurate storm sewer system map and information table and shall update it in accordance with the schedule set out in Table 1 of this section.*

...

*b. The operator shall effectively prohibit, through ordinance or other legal mechanism, nonstormwater discharges into the storm sewer system to the extent allowable under federal, state, or local law, regulation, or ordinance. Categories of nonstormwater discharges or flows (i.e., illicit discharges) identified in 4VAC50-60-400 D 2 c (3) must be addressed only if they are identified by the operator as significant contributors of pollutants to the small MS4. Flows that have been identified in writing by the Department of Environmental Quality as de minimis discharges are not significant sources of pollutants to surface water and do not require a VPDES permit.*

*c. The operator shall develop, implement, and update, when appropriate, written procedures to detect, identify, and address unauthorized nonstormwater discharges, including illegal dumping, to the small MS4. These procedures shall include:*

*(1) Written dry weather field screening methodologies to detect and eliminate illicit discharges to the MS4 that include field observations and field screening monitoring and that provide:*

*(a) A prioritized schedule of field screening activities determined by the operator based on such criteria as age of the infrastructure, land use, historical illegal discharges, dumping or cross connections.*

*(b) The minimum number of field screening activities the operator shall complete annually to be determined as follows: (i) if the total number of outfalls in the small MS4 is less than 50, all outfalls shall be screened annually or (ii) if the small MS4 has 50 or more total outfalls, a minimum of 50 outfalls shall be screened annually.*

*(c) Methodologies to collect the general information such as time since the last rain, the quantity of the last rain, site descriptions (e.g., conveyance type and dominant watershed land uses), estimated discharge rate (e.g., width of water surface, approximate depth of water, approximate flow velocity, and flow rate), and visual observations (e.g., order, color, clarity, floatables, deposits or stains, vegetation condition, structural condition, and biology );*

*(d) A time frame upon which to conduct an investigation or investigations to identify and locate the source of any observed continuous or intermittent nonstormwater discharge prioritized as follows: (i) illicit discharges suspected of being sanitary sewage or significantly contaminated must be investigated first and (ii) investigations of illicit discharges suspected of being less hazardous to human health and safety such as noncontact cooling water or wash water may be delayed until after all suspected sanitary sewage or significantly contaminated discharges have been investigated, eliminated, or identified. Discharges authorized under a separate VPDES or state permit require no further action under this permit.*

*(e) Methodologies to determine the source of all illicit discharges shall be conducted. If an illicit discharge is found, but within six months of the beginning of the investigation neither the source nor the same nonstormwater discharge has been identified, then the operator shall document such in accordance with Section II B 3 f. If the observed discharge is intermittent, the operator must document that a minimum of three separate investigations were made in an attempt to observe the discharge when it was flowing. If these attempts are unsuccessful, the operator shall document such in accordance with Section II B 3 f.*

*(f) Mechanisms to eliminate identified sources of illicit discharges including a description of the policies and procedures for when and how to use legal authorities;*

*(g) Methods for conducting a follow-up investigation in order to verify that the discharge has been eliminated.*



### MCM #3: Illicit Discharge Detection and Elimination

*(h) A mechanism to track all investigations to document: (i) the date or dates that the illicit discharge was observed and reported; (ii) the results of the investigation; (iii) any follow-up to the investigation; (iv) resolution of the investigation; and (v) the date that the investigation was closed.*

*d. The operator shall promote, publicize, and facilitate public reporting of illicit discharges into or from MS4s. The operator shall conduct inspections in response to complaints and follow-up inspections as needed to ensure that corrective measures have been implemented by the responsible party.*

*e. The MS4 Program Plan shall include all procedures developed by the operator to detect, identify, and address nonstormwater discharges to the MS4 in accordance with the schedule in Table 1 in this section. In the interim, the operator shall continue to implement the program as included as part of the registration statement until the program is updated to meet the conditions of this permit. Operators, who have not previously held MS4 permit coverage, shall implement this program in accordance with the schedule provided with the completed registration statement.*

### **Program Plan Update Requirement**

The Town must have an accurate storm sewer system map that meets the requirements of Section II.B.3.a of the permit no later than the end of PY4. The schedule for meeting this requirement is found in BMP 3.A.

The Town has developed an Illicit Discharge Detection Elimination Plan (IDDE plan) in accordance with the requirements of Section II.C.3.c of the permit. The IDDE plan is included as Appendix B and is implemented through BMP 3.C and BMP 3.D.

### **BMP 3.A – Storm Sewer Infrastructure Map**

**Objective and Expected Results:** An accurate storm sewer map and associated outfall tables ensure that the Town has a full understanding of the storm drain system and also enables the Town to conduct outfall reconnaissance as described in BMP 3.C.

**Implementation Schedule:** The Town completed an update of the storm sewer map during the previous permit cycle that includes all the information required in the previous permit. The current permit requires the outfall information table to include the estimated drainage area for MS4 outfalls.

- Maintain an accurate storm sewer system map and perform quality assurance and quality control measures as needed.
- Enforce Section 13-71 of the Town’s Subdivision and Land Development Regulations that requires all land development applicants to provide a digital image file for all approved site plans and “as-built” drawings.
- During the previous permit the Town identified and mapped physical interconnections with the Loudoun County MS4 and provided notification as applicable. Neighboring MS4s will be notified of any new physical interconnections as applicable.
- By the end of PY4, update the storm system map and outfall tables in accordance with permit requirements.

**Responsible Party:** DPW will take the lead on this effort with the assistance of IT.

**Documentation and Evaluation Criteria:** The Town will continuously collect any new data and update the storm sewer and outfall map and include any updates or required notifications



during the applicable annual report. The Town will provide the updated outfall information table with the PY4 annual report.

### **BMP 3.B – Authority to Address Illicit Discharges**

**Objective and Expected Results:** The Town must have appropriate enforcement and right-of-entry tools to effectively prohibit non-stormwater discharges to the storm sewer system. Town Code Section 14-23(b) addresses illicit discharges and was updated in April 2014.

**Implementation Schedule:** Enforce the provisions of Town Code Section 14-23(b).

**Responsible Party:** DPW will take the lead on this effort with the assistance and support of Loudoun County Fire, Rescue, and Emergency Services and the Town Attorney.

**Documentation and Evaluation Criteria:** The Town will report the number of illicit discharges and provide a narrative on how the discharges were controlled or eliminated as part of BMP 3.F. The Town will annually assess whether any changes to the Town Code are necessary to enforce against future discharges.

### **BMP 3.C – Written Procedures for Illicit Discharges and Illegal Dumping**

**Objective and Expected Results:** This BMP addresses the permit requirement to develop written procedures to detect, identify, and address unauthorized discharges and illegal dumping to the Town's MS4.

**Implementation Schedule:** The Town developed a written IDDE plan in September 2007. The Town has revised the IDDE plan to incorporate new MS4 permit requirements. The updated plan is included in Appendix B.

- Beginning PY2, implement the updated IDDE plan.
- Incorporate the updated IDDE plan into field personnel training on recognizing and reporting illicit discharges in BMP 6.D.

**Responsible Parties:** DPW will take the lead on this effort.

**Documentation and Evaluation Criteria:** The Town will document any changes to the IDDE plan in the applicable annual report.

### **BMP 3.D – Dry Weather Outfall Reconnaissance**

**Objective and Expected Results:** This BMP is designed to identify and eliminate discharges as soon as possible through proactive dry weather outfall reconnaissance.

**Implementation Schedule:**

- In PY2, conduct a desktop assessment to prioritize outfalls for screening based on the prioritization criteria developed in the IDDE plan.
- Beginning PY2, perform dry weather outfall reconnaissance for at least 50 outfalls. The outfalls will be prioritized for inspection based on the desktop assessment.

**Responsible Party:** DPW will take the lead on this effort.

**Documentation and Evaluation Criteria:** Annually summarize all dry weather outfall screening activities in the annual report, including the total number of outfalls screened, the screening results, and follow up actions. The Town will document its response to potential illicit discharges in BMP 3.F.

### **BMP 3.E – Public Reporting of Suspected Illicit Discharges and Illegal Dumping**

**Objective and Expected Results:** This BMP is designed to promote the ability of the public to report suspected illicit discharges and illegal dumping so that the Town can take appropriate follow-up action. The Town has implemented an “Illegal Discharge Information and Reporting” function on the webpage at <https://www.leesburgva.gov/government/departments/public-works/water-quality-stormwater-management/illegal-discharge-information-and-reporting/report-illicit-discharge-or-illega>.

**Implementation Schedule:**

- Continue to maintain an “Illegal Discharge Information and Reporting” function on the Town’s webpage.
- Beginning PY3, the Town will create an online form for residents to submit reports of suspected illicit discharge activity and promote the online form in one of the postcards send to residents in BMP 1.C.

**Responsible Party:** DPW will take the lead on this effort with the assistance of the PIO and IT.

**Documentation and Evaluation Criteria:** The Town will document efforts to promote reporting of suspected illicit discharges and illegal dumping. The Town will document its response to potential illicit discharges in BMP 3.F.

### **BMP 3.F – Illicit Discharge Tracking**

**Objective and Expected Results:** The MS4 permit requires that the Town track and process complaints about potential illicit discharges and to coordinate an appropriate response. Potential illicit discharges are identified through the dry weather outfall reconnaissance program in BMP 3.D, public reporting for illicit discharges in BMP 3.E, public reporting for erosion and sediment control issues in BMP 4.C, or staff reporting in BMP 6.D.

**Implementation Schedule:** Maintain a tracking database to record potential and actual illicit discharges.

**Responsible Party:** DPW will take the lead on this effort.

**Documentation and Evaluation Criteria:** The Town will provide a summary in each annual report of all potential and actual illicit discharges in the tracking database. For each case, the Town will provide: the date the discharge was observed or reported; follow up activities; measures to resolve the investigation; and, closure date.

### **BMP 3.G – Household Hazardous Waste Program**

**Objective and Expected Results:** Household Hazardous Waste (HHW), when improperly handled, can become a significant potential source of illicit discharges to the storm sewer system. The Loudoun County Office of Solid Waste Management runs a HHW collection program, with several events occurring throughout the year.

**Implementation Schedule:** Advertise Loudoun County HHW events through various media, including the Town’s website.

**Responsible Party:** DPW will take the lead on this effort with the assistance of the PIO and IT.

**Documentation and Evaluation Criteria:** The Town will provide a summary of efforts to publicize the HHW program, including examples of press releases, event flyers, and the webpage.

**BMP 3.H – Storm Drain Marking Program**

**Objective and Expected Results:** The Town’s comprehensive storm drain marking program is designed to educate residents on the impacts of illicit discharges and illegal dumping and to remind them that storm drains connect directly to local streams and eventually the Chesapeake Bay. The program provides volunteers with materials and instructions for placing the markers on storm drains. Volunteer opportunities are promoted on the web site as well as at various community clean-ups and through direct mail pieces to local schools, as well as scout and brownie troops. The program has also been incorporated as an official response when a potential illicit discharge, or illicit discharge hotspot, has been identified.

Beginning in PY2, the Town will also have opportunities for volunteers to verify the condition of previously marked drains and help update status of all curb inlets in the Town. As development has slowed, there are fewer unmarked drains for volunteers to mark. As an effort to continue the program and maintain older inlets, volunteers will be able to take a DPW map plus a checklist and walk their communities to check and report the condition of markers, whether they are missing, need to be replaced, or are in good condition. This will help the Town keep an up-to-date inventory.

**Implementation Schedule:** Continue to implement and promote the storm drain marking program.

**Responsible Party:** DPW will take the lead on this effort.

**Documentation and Evaluation Criteria:** The Town will provide the number of new storm drains marked, the number of events held, and the number of volunteers participating, along with the percentage of total inlets marked as a result of the program. This information will be reported as a sponsored volunteer activity under BMP 2.C.

MCM #3 Implementation Schedule							
BMP	Task	Year(s) to Implement					Responsibility
		PY1	PY2	PY3	PY4	PY5	
3.A	Maintain accurate storm sewer system map.	▶	▶	▶	▶	▶	DPW, GIS
	Ensure compliance with Section 13-71 that requires developers to provide a digital image file.	▶	▶	▶	▶	▶	DPW, GIS
	Identify any new interconnections and notify adjacent MS4s as applicable.	▶	▶	▶	▶	▶	DPW, GIS
	Update outfall tables in accordance with the permit.				■		DPW, GIS
3.B	Enforce Town Code prohibitions against illicit discharges.	▶	▶	▶	▶	▶	DPW, Fire, Police, Town Attorney
3.C	Revise written IDDE procedures.	■					DPW

MCM #3 Implementation Schedule							
	Implement revised IDDE plan and incorporate into training.		▶	▶	▶	▶	DPW
3.D	Conduct desktop assessment to prioritize outfalls for dry weather reconnaissance.		■				DPW, GIS
	Conduct dry weather outfall reconnaissance on 50 outfalls annually.		▶	▶	▶	▶	DPW
3.E	Continue to operate the "Report a Problem" feature for public complaints.	▶	▶	▶	▶	▶	DPW, PIO, IT
	Include the "Illegal Discharge Information Reporting" function in the postcard as part of BMP 1.C.			■	▶	▶	DPW, PIO
3.F	Maintain the tracking database.	▶	▶	▶	▶	▶	DPW
3.G	Promote Loudoun County HHW program and events.	▶	▶	▶	▶	▶	DPW, PIO, IT
3.H	Continue storm drain marking program and update the inventory of inlets and markers.	▶	▶	▶	▶	▶	DPW

#### MCM #4: Construction Site Stormwater Runoff Control

Permit Reference: Section II B. 4

Relevant Excerpt:

e. *MS4 Program requirements. The operator's MS4 Program Plan shall include:*

*(1) A description of the legal authorities utilized to ensure compliance with the minimum control measure in Section II related to construction site stormwater runoff control such as ordinances, permits, orders, specific contract language, and interjurisdictional agreements;*

*(2) Written plan review procedures and all associated documents utilized in plan review;*

*(3) For the MS4 operators who obtain department-approved standards and specifications, a copy of the current standards and specifications;*

*(4) Written inspection procedures and all associated documents utilized during inspection including the inspection schedule;*

*(5) Written procedures for compliance and enforcement, including a progressive compliance and enforcement strategy, where appropriate; and*

*(6) The roles and responsibilities of each of the operator's departments, divisions, or subdivisions in implementing the minimum control measure in Section II related to construction site stormwater runoff control. If the operator utilizes another entity to implement portions of the MS4 Program Plan, a copy of the written agreement must be retained in the MS4 Program Plan. The description of each party's roles and responsibilities, including any written agreements with third parties, shall be updated as necessary.*

*Reference may be made to any listed requirements in this subdivision provided the location of where the reference material can be found is included and the reference material is made available to the public upon request.*

f. *Reporting requirements. The operator shall track regulated land-disturbing activities and submit the following information in all annual reports:*

*(1) Total number of regulated land-disturbing activities;*

*(2) Total number of acres disturbed;*

*(3) Total number of inspections conducted; and*

*(4) A summary of the enforcement actions taken, including the total number and type of enforcement actions taken during the reporting period.*

#### **Program Plan Update Requirement**

The Town's construction site stormwater runoff control program is designed to minimize impacts from land-disturbing activities and meet all applicable local, state and federal requirements. The following provides an overview of the Town's program in accordance with the requirements of Section II.B.4 of the permit.

**Description of Legal Authorities:** Legal authority for the Town's program is contained in Town Code Section 14-23(f). The Town was approved as a Virginia Stormwater Management Program (VSMP) authority by DEQ on June 13, 2014. The Town of Leesburg leverages Loudoun County's erosion and sediment control program to meet construction site stormwater runoff control requirements. A Memorandum of Understanding (MOU) has been executed between the Town and the County to memorialize roles and responsibilities and is provided in Appendix C.

**Written Plan Review Procedures:** Written plan review procedures are provided in the Town's "Submittal and Review of Stormwater Management and Erosion Control Plans Standard Operating Procedure." This document is provided in Appendix C.

**Written Inspection and Enforcement Procedures:** Written inspection and enforcement procedures are provided in the Town's "Construction Site Inspection Process Standard Operating Procedure." This document is provided in Appendix C.

**Roles and Responsibilities:** The Department of Plan Review is responsible for overall coordination of the plan review process. In accordance with the MOU between the Town and the County, the County handles the review and approval of erosion and sediment control plans. Also in accordance with the MOU, Loudoun County inspects erosion and sediment control measures for land-disturbing activities. To supplement the County's efforts, the Town maintains inspection staff with DEQ erosion and sediment control certification.

**Public Reporting Mechanism:** Section II.B.4.c(4) of the permit requires that the Town maintain and promote a public mechanism for the receipt of complaints about land disturbing activities. Complaints can be sent to the Town by phone or through the "I Want to Report..." portal on the Town's website. This is addressed in BMP 4.C.

#### **BMP 4.A – Maintain Local Program Consistency**

**Objective and Expected Results:** Per the executed MOU, Loudoun County implements plan review and the County's program has been previously rated "consistent" by DEQ. Additionally, the Town received approval on June 13, 2014 as the local VSMP authority.

#### **Implementation Schedule:**

- Implement a program consistent with state law and regulations.
- Train all plan review, inspection, and enforcement staff as required by state law and regulations.

**Responsible Party:** DPR will lead this effort in coordination with DPW and Loudoun County in accordance with the MOU.

**Documentation and Evaluation Criteria:** The Town will include in each annual report a summary of any changes in program consistency, if applicable.

#### **BMP 4.B – Track and Report Land Disturbing Activities**

**Objective and Expected Results:** The Town has developed an Excel spreadsheet to maintain a comprehensive, up-to-date database of erosion and sediment control and land disturbing activities. This spreadsheet allows the Town to track and report all data required in the MS4 permit.

**Implementation Schedule:** Track and submit to DEQ all land disturbing activities in accordance with permit requirements.

**Responsible Party:** DPR will lead this effort.

**Documentation and Evaluation Criteria:** The Town will provide a spreadsheet with each annual report containing: total number of regulated land-disturbing activities; total number of acres disturbed; total number of inspections conducted; and, a summary of the enforcement actions taken, including the total number and type of enforcement actions taken during the reporting period.

**BMP 4.C – Public Reporting of Suspected Erosion and Sediment Control Violations**

**Objective and Expected Result:** Citizens can assist with enforcement of erosion and sediment control requirements when given access to reporting tools. Residents may call the Department of Public Works or use the Town’s web-based “I Want to Report...” function at <https://www.leesburgva.gov/government/departments/public-works/water-quality-stormwater-management/illegal-discharge-information-and-reporting/report-illicit-discharge-or-illega>. The Town will also add a feature to its Leesburg 311 app in PY2 that will allow citizens to submit information via smart phone or tablets and include photos and GPS coordinates of suspected illicit discharge activities.

**Implementation and Schedule:** Continue to maintain erosion and sediment control reporting mechanisms.

**Responsible Party:** DPW will lead on this effort with assistance from DPR and IT.

**Documentation and Measure of Effectiveness:** The Town will coordinate documentation for this BMP with the illicit discharge tracking database in BMP 3.F. For each case, the Town will provide: the date the problem was observed or reported; follow up activities; measures to resolve the investigation; and, closure date.

MCM #4 Implementation Schedule							
BMP	Task	Year(s) to Implement					Responsibility
		PY1	PY2	PY3	PY4	PY5	
4.A	Implement program consistent with state law and regulations.	▶	▶	▶	▶	▶	Loudoun County, Plan Review, DPW
	Train all plan review, inspection, and enforcement staff in accordance with state law and regulations.	▶	▶	▶	▶	▶	Plan Review, DPW
4.B	Track all land disturbing activities in accordance with permit requirements.	▶	▶	▶	▶	▶	Plan Review, DPW, Loudoun County
4.C	Maintain public complaint mechanisms.	▶	▶	▶	▶	▶	DPW, IT, Plan Review



## MCM #5: Post-Construction Stormwater Management

Permit Reference: Section II B. 5

Relevant Excerpt:

*d. MS4 Program Plan requirements. The operator's MS4 Program Plan shall be updated in accordance with Table 1 in this section to include:*

*(1) A list of the applicable legal authorities such as ordinance, state and other permits, orders, specific contract language, and interjurisdictional agreements to ensure compliance with the minimum control measure in Section II related to post-construction stormwater management in new development and development on prior developed lands;*

*(2) Written policies and procedures utilized to ensure that stormwater management facilities are designed and installed in accordance with Section II B 5 b;*

*(3) Written inspection policies and procedures utilized in conducting inspections;*

*(4) Written procedures for inspection, compliance and enforcement to ensure maintenance is conducted on private stormwater facilities to ensure long-term operation in accordance with approved design;*

*(5) Written procedures for inspection and maintenance of operator-owned stormwater management facilities;*

*(6) The roles and responsibilities of each of the operator's departments, divisions, or subdivisions in implementing the minimum control measure in Section II related to post-construction stormwater management in new development and development on prior developed lands. If the operator utilizes another entity to implement portions of the MS4 Program Plan, a copy of the written agreement must be retained in the MS4 Program Plan. Roles and responsibilities shall be updated as necessary.*

*e. Stormwater management facility tracking and reporting requirements. The operator shall maintain an updated electronic database of all known operator-owned and privately-owned stormwater management facilities that discharge into the MS4. The database shall include the following:*

*(1) The stormwater management facility type;*

*(2) A general description of the facility's location, including the address or latitude and longitude;*

*(3) The acres treated by the facility, including total acres, as well as the breakdown of pervious and impervious acres;*

*(4) The date the facility was brought online (MM/YYYY). If the date is not known, the operator shall use June 30, 2005, as the date brought online for all previously existing stormwater management facilities;*

*(5) The sixth order hydrologic unit code (HUC) in which the stormwater management facility is located;*

*(6) The name of any impaired water segments within each HUC listed in the 2010 § 305(b)/303(d) Water Quality Assessment Integrated Report to which the stormwater management facility discharges;*

*(7) Whether the stormwater management facility is operator-owned or privately-owned;*

*(8) Whether a maintenance agreement exists if the stormwater management facility is privately owned; and*

*(9) The date of the operator's most recent inspection of the stormwater management facility.*

*In addition, the operator shall annually track and report the total number of inspections completed and, when applicable, the number of enforcement actions taken to ensure long-term maintenance.*

*The operator shall submit an electronic database or spreadsheet of all stormwater management facilities brought online during each reporting year with the appropriate annual report. Upon such time as the department provides the operators access to a statewide web-based reporting electronic database or spreadsheet, the operator shall utilize such database to complete the pertinent reporting requirements of this state permit.*



### **Program Update Requirement**

The Town's post construction stormwater management program is designed to meet all applicable local, state and federal requirements to minimize the long-term water quality impacts associated with development and redevelopment. The following provides an overview of the Town's program in accordance with the requirements of Section II.B.5 of the permit.

**Description of Legal Authorities:** The Town made revisions to the Design and Construction Standards Manual (DCSM), the Subdivision and Land Development Regulations (SLDR), the Town Code (Section 14-23), and the Land Development Fee Schedule consistent with the obligations and requirements set forth in the Virginia Stormwater Management Regulations (9VAC25-870 et seq). The Town was approved as a VSMP authority by DEQ on June 13, 2014.

**Written Stormwater Facility Design and Installation Procedures:** The Town requires that stormwater management facilities are designed properly and installed per design to ensure that pollutant reduction requirements are met, and that the facility continues to provide long-term water quality benefits. Changes were made to the DCSM and the SLDR to incorporate new requirements in the VSMP regulations. The Town reviews development projects to ensure they are meeting VSMP criteria for water quality and water quantity requirements, along with DEQ-approved annual standards and specifications, using the Virginia BMP Clearinghouse, the Virginia Stormwater Management Handbook, and the DCSM. The DCSM can be found the Town's website at <http://www.leesburgva.gov/how-do-i/browse-documents/-folder-554>.

Written plan review procedures are provided in the Town's "Submittal and Review of Stormwater Management and Erosion Control Plans Standard Operating Procedure." This document is provided in Appendix C.

**Written Inspection, Compliance, and Enforcement Procedures:** The Town ensures that maintenance is performed for both private and public stormwater management facilities so that they continue to provide the intended water quality benefits.

The Town requires private facility owners to enter into a BMP Maintenance Agreement to provide for maintenance and inspection of facilities. The Town requires that private BMP owners provide a maintenance report certified by a Professional Engineer, Landscape Architect, or Certificate of Competency no later than December 31<sup>st</sup> of each year. Follow-up notices are sent to owners who do not provide an annual maintenance report. Town Code Section 14-24 provides for penalties for noncompliance. Frequency of inspection by Town staff of public facilities is based upon the type of facility, the manufacturer's specifications, and expected maintenance needs. The Town considered these factors in creating an "alternative schedule" for inspected public facilities.

The following written procedures for private and public facilities are contained in Appendix C:

- "Best Management Practice (BMP) Maintenance and Inspection Standard Operating Procedure."
- Sample private property owner "Notice Letter" requesting a BMP maintenance report.
- "Inspection and Maintenance Procedures for Operator-Owned BMPs" (including the alternative schedule for the inspection of public facilities).

**Roles and Responsibilities:** DPW is responsible for ensuring compliance with post construction stormwater management facility design, inspection, and maintenance

requirements, with assistance from Plan Review. The Town Attorney assists with enforcement as necessary.

**Individual Residential Lot Special Criteria:** Section II.B.5.c(1)(d) of the permit allows the Town to consider the use of alternatives to maintenance agreements for stormwater management facilities designed to treat runoff solely from individual residential lots. The Town considered alternatives and determined that it is appropriate to maintain the existing requirement for all owners of stormwater facilities to enter into a maintenance agreement with the Town.

### **BMP 5.A – Maintain Local Program Consistency**

**Objective and Expected Results:** The Town has a program and procedures in place to effectively address post-construction stormwater quality and quantity in accordance with the VSMP regulations (9VAC25-870 et seq).

#### **Implementation Schedule:**

- Implement a post-construction stormwater runoff management program consistent with state law and regulations.
- Train all plan review, inspection, and enforcement staff as required by state law and regulations.

**Responsible Party:** Plan Review will serve as the lead for facility design and implementation. DPW will serve as the lead for inspection, compliance, and enforcement.

**Documentation and Evaluation Criteria:** According to the VSMP regulations (9VAC25-870-144), DEQ will review each approved local VSMP at least once every five years. The Town will provide a summary of any changes in consistency status and any actions to maintain consistency.

### **BMP 5.B – Stormwater Facility Tracking**

**Objective and Expected Results:** The Town has developed an Excel spreadsheet to maintain a comprehensive, up-to-date database of existing BMP facilities. This spreadsheet allows the Town to track and report all required data required in the MS4 permit.

#### **Implementation Schedule:**

- Continue to track each new stormwater management facility installed during the reporting period in the dedicated database.
- Record in the database each inspection and enforcement action, as applicable.
- By the end of PY2, determine the breakdown of impervious and pervious area for each stormwater facility and enter the information into the stormwater facility database. The previous permit required the database to include total acres treated for each facility. The current permit requires the total acres treated, along with a breakdown of impervious and pervious acres.

**Responsible Party:** DPW will maintain the database with information from Plan Review.

**Documentation and Evaluation Criteria:** The Town will submit an electronic database or spreadsheet of all facilities brought online during the reporting period with the appropriate annual report. The data will include: the type of facility, location, acres treated (total acres with a breakdown of impervious and pervious acres), date brought online, sixth order Hydrologic Unit Code (HUC), the name of the impaired stream segment the facility is discharging into, whether

public or private, existence of maintenance agreement, date of the most recent inspection, and when applicable, the number of enforcement actions.

**BMP 5.C – Stormwater Facility Maintenance and Inspection Program**

**Objective and Expected Results:** Maintenance is critical to ensuring that public and private stormwater management facilities continue to provide the desired benefits to water quality.

**Implementation Schedule:**

- Continue to ensure that all new facilities are subject to the provisions of a maintenance agreement and have a recorded stormwater detention easement prior to release of the construction bond.
- Notify all private facility owners/operators of their responsibility to submit an annual maintenance inspection letter. The Town will initiate appropriate enforcement procedures against private owners that do not submit maintenance inspection reports.
- Conduct inspections of all privately owned stormwater management BMPs at least once every five years to comply with permit requirements and to complement the requirement for maintenance letters to be submitted by the owner.
- The Town will inspect owner-operated BMPs per the “alternative schedule” and SOP provided in Appendix C.

**Responsible Party:** DPW will serve as the lead on this effort, with support from Plan Review, GIS, and the Town Attorney for enforcement, as necessary.

**Documentation and Evaluation Criteria:** The Town will report on the number BMPs inspected each year, which will include the number and type of enforcement actions taken, if applicable.

MCM #5 Implementation Schedule							
BMP	Task	Year(s) to Implement					Responsibility
		PY1	PY2	PY3	PY4	PY5	
5.A	Implement program consistent with state law and regulations.	▶	▶	▶	▶	▶	Town Council, Town Attorney, DPW, Plan Review
	Train all plan review, inspection, and enforcement staff in accordance with state law and regulations.		▶	▶	▶	▶	DPW, Plan Review
5.B	Track information on all new facilities in accordance with permit requirements.	▶	▶	▶	▶	▶	DPW
	Track information on all enforcement activities.	▶	▶	▶	▶	▶	
	Update database to include information on pervious and impervious surface area		▪				DPW, Plan Review, GIS

MCM #5 Implementation Schedule							
	treated.						
5.C	Enforce provisions that require BMP maintenance agreements and easements.	▶	▶	▶	▶	▶	DPW
	Require private BMP owners to provide maintenance letters annually. Initiate appropriate enforcement action as necessary.	▶	▶	▶	▶	▶	DPW, Town Attorney
	Conduct inspection of all privately owned facilities once every five years.	▶	▶	▶	▶	▶	DPW
	Conduct inspection of publicly maintained BMPs per the "alternative schedule."	▶	▶	▶	▶	▶	DPW

## **MCM #6: Pollution Prevention and Good Housekeeping for Municipal Operations**

Permit Requirement: Section II B. 6

Relevant Excerpt:

*f. At a minimum, the MS4 Program Plan shall contain:*

*(1) The written protocols being used to satisfy the daily operations and maintenance requirements;*

*(2) A list of all municipal high-priority facilities that identifies those facilities that have a high potential for chemicals or other materials to be discharged in stormwater and a schedule that identifies the year in which an individual SWPPP will be developed for those facilities required to have a SWPPP. Upon completion of a SWPPP, the SWPPP shall be part of the MS4 Program Plan. The MS4 Program Plan shall include the location in which the individual SWPPP is located;*

*(3) A list of lands where nutrients are applied to a contiguous area of more than one acre. Upon completion of a turf and landscape nutrient management plan, the turf and landscape nutrient management plan shall be part of the MS4 Program Plan. The MS4 Program Plan shall include the location in which the individual turf and landscape nutrient management plan is located; and*

*(4) The annual written training plan for the next reporting cycle.*

### **Program Update Requirement**

**Good Housekeeping Procedures:** The Town developed and is now implementing daily good housekeeping procedures as required in Section II.B.6.a. These are described in BMP 6.H and included as Appendix D.

**Stormwater Pollution Prevention Plans:** The permit requires the identification of locations designated as high-priority facilities due to the high potential for pollutant discharges, and the development and implementation of SWPPPs for those facilities. High-priority facilities may include composting, equipment storage and maintenance, recycling, solid waste handling and transfer, salt and materials storage, pesticide storage, public works yards, and vehicle storage and maintenance yards. Three Town facilities fall into one of these categories, including the Water Pollution Control Facility, the Central Maintenance Facility, and the Leesburg Airport. However, each of these facilities is currently covered under a separate VPDES industrial stormwater permit and has therefore already developed and implemented a SWPPP. No other municipally-owned facilities are subject to the requirement to develop a SWPPP under the permit. This is reflected in BMP 6.G.

**Nutrient Management Plans:** The permit requires the identification of properties where nutrients are applied to more than one contiguous acre. The Town must then develop a schedule for implementing nutrient management plans (NMPs) for these properties. Five properties have been identified. The schedule for meeting this requirement is reflected in BMP 6.C.

**Training Plan:** The Town has developed a training schedule and program in accordance with the permit requirements. The training program is reflected in BMPs 6.D, 6.E, and 6.F.

### **BMP 6.A – Street Sweeping Program**

**Objective and Expected Results:** Street sweeping plays a significant role in pollution prevention by keeping trash and particulates from entering the storm drain system.

**Implementation Schedule:** Continue the street sweeping operation, which generally runs from March through November, weather permitting.

**Responsible Party:** DPW will serve as lead on this effort.

**Documentation and Evaluation Criteria:** The Town will provide a summary of street sweeping activities, including the total lane miles swept and the amount of debris removed.

**BMP 6.B – Herbicide and Pesticide Applicator Certifications**

**Objective and Expected Results:** When misapplied, herbicides and pesticides can be a source of stormwater pollution. The Town maintains and tracks certifications for all employees handling and applying pesticides and herbicides.

**Implementation Schedule:**

- Continue to maintain the proper training and certifications for all employees handling and applying pesticides and herbicides in accordance with the Virginia Pest Control Act (§3.2-3900 et seq. of the Code of Virginia).
- By the end of PY2, use contract language, written certification, or other means, to ensure that contractor applicators applying on Town properties secure the proper training and certification.

**Responsible Party:** DPW and DPR share responsibility for implementing this effort.

**Documentation and Evaluation Criteria:** The Town will provide documentation that all employees that apply pesticides and herbicides are certified by the Virginia Department of Agriculture and Consumer Services. The PY2 annual report will contain the contract language, written certification, or other means adopted by the Town to ensure that contractor applicators have proper training and certification.

**BMP 6.C – Turf and Landscape Nutrient Management Plans**

**Objective and Expected Results:** Excessive nutrients applied to turf and landscape areas have the potential to impact water quality if not applied in accordance with a nutrient management plan (NMP). Stormwater impacts can be minimized from these areas by implementing a NMP developed by a certified nutrient planner consistent with § 10.1-104.2 of the Code of Virginia.

**Implementation Schedule:** In accordance with MS4 permit, the Town has identified properties greater than one contiguous acre where nutrients are applied. The Town must develop and implement NMPs for these properties based on the following schedule: for no less than 15% of identified acres by June 30, 2015, no less than 40% by June 30, 2016, no less than 75% by June 30, 2017, and for 100% of identified acres by June 30, 2018. The following table provides locations identified as needing NMPs.

Name and Address	Size (ac)	Year to Implement NMP	Cumulative Percent	Latitude and Longitude
Freedom Park 101 Tolbert Lane, SE	25.4	PY2	13%	Lat: 39.089047 Long: -77.569296
Ida Lee Park Ida Lee Farmhouse 50 Ida Lee Drive, NW	138.0	PY3	85%	Lat: 39.123595 Long: -77.565736

Name and Address	Size (ac)	Year to Implement NMP	Cumulative Percent	Latitude and Longitude
Ida Lee Recreation Center 60 Ida Lee Drive, NW				
Robinson Park, Plaza Street	10.0	PY3	91%	Lat: 39.122227; Long: -77.549160
Thomas Balch Library	2.0	PY4	92%	Lat: 39.116669; Long: -77.567689
Foxridge Park West End of Catoctin Circle	9.0	PY4	96%	Lat: 39.114768; Long: -77.581076
Brandon Park South Harrison Street Behind F&M Bank	3.0	PY5	100%	Lat: 39.105321; Long: -77.561095
Leesburg Municipal Government Center 25 W. Market St.	3.0			Lat: 39.115352; Long: -77.565485
<b>Total</b>	<b>190.4</b>		<b>100%</b>	

**Responsible Party:** P&R is the lead for implementing this effort, with assistance from DPW as needed.

**Documentation and Evaluation Criteria:** The Town will provide documentation of how NMPs are being implemented in the annual report. This will include a summary report on the development and implementation of the required NMPs and the total acreage for which NMPs have been implemented. Individual NMPs will be located at the affected property and will be available to DEQ on request.

**BMP 6.D – Training of Field Personnel on Recognizing and Reporting Illicit Discharges**

**Objective and Expected Results:** Town employees whose normal duties require a considerable amount of field duty are an important part of the Town’s efforts to identify and correct potential illicit discharges. Training will provide the appropriate tools for field personnel to recognize a potential discharge, document relevant information, and report the incident for follow up by Town staff.

**Implementation Schedule:** As required in the permit, the Town will provide biennial training for the field positions listed below. Training tools may include, but are not limited to, videos, presentations, manuals, desktop exercises, booklets, and field exercises, as appropriate. Training may be coordinated with SWPPP training in BMP 6.G and may be conducted with the entire group or broken into smaller functional areas as appropriate to minimize impact on normal operations.



Job Classification	FTEs*	Agency	Training Due
<b>Capital Projects</b>			
Construction Inspector	1	Capital Projects Management	PY2 & PY4
Project Manager	1	Capital Projects Management	PY2 & PY4
Senior Engineer	1	Capital Projects Management	PY2 & PY4
<b>Parks and Recreation</b>			
Groundskeeper I	2	Parks	PY2 & PY4
Groundskeeper II	4	Parks	PY2 & PY4
Lead Groundskeeper	1	Parks	PY2 & PY4
Parks Manager	1	Parks	PY2 & PY4
<b>Public Works</b>			
Traffic Technician	1	Street Lighting	PY2 & PY4
Assistant Super for Streets and Grounds	1	Streets and Grounds Maintenance	PY2 & PY4
Ground Maintenance Supervisor	1	Streets and Grounds Maintenance	PY2 & PY4
Maintenance Worker II Tech	1	Streets and Grounds Maintenance	PY2 & PY4
Maintenance Worker	1	Streets and Grounds Maintenance	PY2 & PY4
Maintenance Worker III Tech	1	Streets and Grounds Maintenance	PY2 & PY4
Maintenance Worker II-STS and GRD	4	Streets and Grounds Maintenance	PY2 & PY4
Maintenance Worker I-STS and GRD	10	Streets and Grounds Maintenance	PY2 & PY4
Maintenance Worker IV	4	Streets and Grounds Maintenance	PY2 & PY4
Superintendant, Streets and Grounds	1	Streets and Grounds Maintenance	PY2 & PY4
Construction Inspection Supervisor	1	Engineering and Inspections	PY2 & PY4
Construction Inspector	2	Engineering and Inspections	PY2 & PY4
<b>Utilities</b>			
Environmental Compliance Inspector	1	Utilities Administration	PY2 & PY4
Maintenance Worker I-UTL	1	Utilities Administration	PY2 & PY4
Meter Supervisor	1	Utilities Administration	PY2 & PY4
Utility Inspector	3	Utilities Administration	PY2 & PY4
Utility Technician II	3	Utilities Administration	PY2 & PY4



Job Classification	FTEs*	Agency	Training Due
Utility Maintenance Worker IV	1	Utilities Maintenance	PY2 & PY4
Utility Maintenance Supervisor	3	Utilities Maintenance	PY2 & PY4
Utility Maintenance Worker I	2	Utilities Maintenance	PY2 & PY4
Utility Technician I	2	Utilities Maintenance	PY2 & PY4
Utility Technician II	3	Utilities Maintenance	PY2 & PY4
Utility Technician III	1	Utilities Maintenance	PY2 & PY4
<b>Total FTEs</b>	<b>63</b>		

\*Full Time Equivalent based on FY14 funded filled positions.

**Responsible Party:** DPW will coordinate the effort overall, with assistance from the associated agencies for selected personnel.

**Documentation and Evaluation Criteria:** A list of training events held, the training date, the number of employees attending, and the objective of the training will be provided in each annual report for the corresponding reporting period listed above. Sign-in sheets and materials will be retained for a minimum of three years.

**BMP 6.E –Training on Good Housekeeping and Pollution Prevention for Maintenance, Public Works, and Recreation Facility Staff**

**Objective and Expected Results:** Town staff engages in a number of daily activities that have the potential to adversely impact water quality. Training staff on good housekeeping and pollution prevention increases the likelihood that impacts will be avoided. Section II.B.6.d requires training for specific categories of employees, including staff working in and around recreational, public works, and maintenance facilities, and staff performing road, street and parking lot maintenance

**Implementation Schedule:** As required in the permit, the Town will provide biennial training to staff working in and around recreational, public works, and maintenance facilities, and staff performing road, street and parking lot maintenance. Training tools may include, but are not limited to, videos, presentations, manuals, desktop exercises, booklets, and field exercises, as appropriate. Training may be coordinated with SWPPP training in BMP 6.G and may be conducted with the entire group or broken into smaller functional areas as appropriate to minimize impact on normal operations.

Job Classification	FTEs*	Agency	Training Due
<b>Parks and Recreation</b>			
Groundskeeper I	2	Parks	PY3 & PY5
Groundskeeper II	4	Parks	PY3 & PY5
Lead Groundskeeper	1	Parks	PY3 & PY5
Parks Manager	1	Parks	PY3 & PY5

Job Classification	FTEs*	Agency	Training Due
Building Service Manager	1	Ida Lee Recreation Center	PY3 & PY5
Building Service Supervisor	1	Ida Lee Recreation Center	PY3 & PY5
Custodian – F/T	3	Ida Lee Recreation Center	PY3 & PY5
Maintenance Supervisor	1	Ida Lee Recreation Center	PY3 & PY5
Maintenance Worker III – P&R	1	Ida Lee Recreation Center	PY3 & PY5
Maintenance Worker	1	Ida Lee Recreation Center	PY3 & PY5
Aquatics Manager	1	Aquatics	PY3 & PY5
Aquatics Supervisor	1	Aquatics	PY3 & PY5
Recreational Programs Supervisor – Sports	1	Sport Programs	PY3 & PY5
<b>Public Works</b>			
Assistant Super for Streets and Grounds	1	Streets and Grounds Maintenance	PY3 & PY5
Equipment Operator	1	Streets and Grounds Maintenance	PY3 & PY5
Ground Maintenance Supervisor	1	Streets and Grounds Maintenance	PY3 & PY5
Maintenance Worker III-STS & GRDS	1	Streets and Grounds Maintenance	PY3 & PY5
Maintenance Supervisor	1	Streets and Grounds	PY3 & PY5
Maintenance Worker II Tech	1	Streets and Grounds Maintenance	PY3 & PY5
Maintenance Worker	1	Streets and Grounds Maintenance	PY3 & PY5
Maintenance Worker III Tech	1	Streets and Grounds Maintenance	PY3 & PY5
Maintenance Worker II-STS & GRDS	4	Streets and Grounds Maintenance	PY3 & PY5
Maintenance Worker I-STS & GRDS	10	Streets and Grounds Maintenance	PY3 & PY5
Maintenance Worker IV	4	Streets and Grounds Maintenance	PY3 & PY5
Superintendent, Streets and Grounds	1	Streets and Grounds Maintenance	PY3 & PY5
Buildings Maintenance Supervisor	1	Building Maintenance	PY3 & PY5
Maintenance Worker I-BULDGS	1	Building Maintenance	PY3 & PY5
Maintenance Worker IV	1	Building Maintenance	PY3 & PY5
Superintendent of Building	1	Building Maintenance	PY3 & PY5

Job Classification	FTEs*	Agency	Training Due
Maintenance			
<b>Utilities</b>			
Utilities Generalist	1	Utilities Administration	PY3 & PY5
<b>Total FTEs</b>	<b>51</b>		

\*Full Time Equivalent based on FY14 funded filled positions.

**Responsible Party:** DPW will coordinate the effort overall, with assistance from the associated agencies for selected personnel.

**Documentation and Evaluation Criteria:** A list of training events held, the training date, the number of employees attending, and the objective of the training will be provided in each annual report for the corresponding reporting period listed above. Sign-in sheets and materials will be retained for a minimum of three years.

**BMP 6.F – Emergency Spill Response Training**

**Objective and Expected Results:** Section II.B.6.d(8) requires all emergency response employees to have training in spill response. Training for Fire and Rescue is the responsibility of Loudoun County. Leesburg Police are initially trained in spill response as part of the Northern Virginia Criminal Justice Training Academy.

**Implementation Schedule:**

- Continue to ensure that all new members of the Leesburg Police have basic spill response training as a condition of hiring.
- During PY4, refresher training will be provided through a stormwater-focused spill response module developed by DPW and distributed by the Police Chief.

**Responsible Party:** DPW will coordinate this effort with the Leesburg Police.

**Documentation and Evaluation Criteria:** A description or copy of the module will be provided in the PY4.

**BMP 6.G –Stormwater Pollution Prevention Plans for High-Priority Facilities**

**Objectives and Expected Results:** Town facilities have the potential to impact water quality unless good housekeeping and pollution prevention best management practices are developed and implemented for those facilities. Three Town facilities are considered high-priority, including the Water Pollution Control Facility, the Central Maintenance Facility, and the Leesburg Airport. Each of these facilities is currently covered under a separate VPDES industrial stormwater permit and has therefore already developed and implemented a SWPPP.

**Implementation Schedule:** Implement SWPPPs for the Water Pollution Control Facility, the Central Maintenance Facility, and the Leesburg Airport.

**Responsible Party:** Utilities implements the Water Pollution Control Facility SWPPP, DPW implements the Central Maintenance Facility SWPPP, and Leesburg Airport implements the Airport SWPPP.

**Documentation and Evaluation Criteria:** The Town will report any changes to the permit status of these facilities in the associated annual report.

### **BMP 6.H – Good Housekeeping Standard Operating Procedures for Daily Operations**

**Objectives and Expected Results:** Section II.B.6.a of the permit requires the development and implementation of standard operating procedures (SOPs) to minimize or prevent pollutant discharge from: daily operations such as road, street, and parking lot maintenance; equipment maintenance; and the application, storage, transport, and disposal of pesticides, herbicides, and fertilizers. The Department of Public Works has established a “Standard Operating Procedure for Stormwater Pollution Prevention” manual that addresses topics such as: catch basin cleaning; catch basin repair; outfall repair; storm drain system repair; erosion and sediment control; landscape design and management; pesticide storage and disposal; fertilizer application; weed and pest control; mowing and irrigation; vehicle and equipment storage; vehicle and equipment washing; vehicle and equipment fueling; spill cleanup; parts cleaning and storage; produce use, storage, and disposal; petroleum and chemical handling and disposal; refuse storage; general housekeeping; floor drains; painting; street sweeping; snow removal; sand and salt storage; and salt application.

#### **Implementation Schedule:**

- During PY2, review, and if necessary, update the SOP to comply with the MS4 permit requirements.
- Beginning PY3, implement the revised SOPs.
- Beginning PY3, the SOPs will be reviewed annually by each division/department head with a cover letter discussing the purpose of the SOP and how it should be continually incorporated into other division/department policies and SOPs, as appropriate.
- Following development, the SOPs will be incorporated into the pollution prevention and good housekeeping training in BMP 6.E, as appropriate.

**Responsible Party:** DPW will lead this effort with assistance from applicable department and division heads.

**Documentation and Evaluation Criteria:** The Town will provide a summary of activities and provide confirmation that the SOPs have been reviewed and any necessary changes have been made. The SOPs for daily operations are included in Appendix D of the MS4 Program Plan.

### **BMP 6.I – Contractor Oversight Procedures**

**Objective and Expected Results:** Contractors performing work on behalf of the Town should use the appropriate procedures and control measures for stormwater discharges to the MS4 to protect water quality. Contractors must follow the appropriate laws and regulations and secure required permits based on the type of activities being performed. Contractors must also adhere to the Town’s SOPs for daily operations.

**Implementation Schedule:** During PY2, create a mechanism to ensure contractor compliance with Town requirements, which may include contract language, bid specifications, certifications, etc.

**Responsible Party:** DPW will be the lead agency, with assistance from Procurement as needed.

**Documentation and Evaluation Criteria:** The Town will provide in the annual report the mechanism selected to ensure contractor adherence to local, state, and federal requirements and the Town’s SOPs.

**BMP 6.J – Proper State Certification for Erosion and Sediment Control**

**Objective and Expected Results:** Ensuring that the appropriate Town staff receives the requisite erosion and sediment control certification required under the Virginia Erosion and Sediment Control Law and attendant regulations as plan reviewers, inspectors, and program administrator is instrumental to preventing impacts from construction activities.

**Implementation Schedule:**

- Continue to require the appropriate staff to obtain and maintain the required E&SC certification.
- Applicable staff will obtain DEQ certification for stormwater management basic, inspector, plan reviewer, and combined administrator, as applicable, upon availability.

**Responsible Party:** DPW will lead this effort.

**Documentation and Measure of Effectiveness:** Staff certification will be kept at the Town for review by DEQ and Town residents.

MCM #6 Implementation Schedule							
BMP	Task	Year(s) to Implement					Responsibility
		PY1	PY2	PY3	PY4	PY5	
6.A	Continue street sweeping program.	▶	▶	▶	▶	▶	DPW
6.B	Maintain certifications for all employees handling pesticides and herbicides.	▶	▶	▶	▶	▶	DPR
	If contract applicators are used, ensure they receive the proper training and certification.		▪	▶	▶	▶	DPR, DPW
6.C	Develop list of lands requiring NMPs.	▪					DPW, DPR
	Develop and implement NMPs.		▶	▶	▶	▶	DPR, DPW
6.D	Provide biennial IDDE training for field personnel.		▪		▪		DPW, Capital Projects, DPR, Utilities
6.E	Provide biennial training to the appropriate staff on good housekeeping and pollution prevention practices.			▪		▪	DPW, DPR
6.F	Require new police to have emergency spill response training.	▶	▶	▶	▶	▶	Police

MCM #6 Implementation Schedule							
	Provide refresher training to emergency spill response personnel.				■		DPW, Police
6.G	Develop list of high-priority facilities requiring SWPPP development.	■					DPW
	Implement stormwater industrial SWPPPs under VPDES permits.	▶	▶	▶	▶	▶	DPW
6.H	Review SOPs and update as necessary.		■				DPW
	Implement SOPs.			▶	▶	▶	DPW
	Review Town-wide stormwater SOPs once annually and update as necessary.			▶	▶	▶	DPW
	Incorporate SOPs into training under 6.E, as appropriate.	▶	▶	▶	▶	▶	DPW
6.I	Create contractor language and/or bid specifications for contractor oversight.		■				DPW, Procurement
6.J	Continue to require the appropriate staff to obtain and maintain the required E&SC certification.	▶	▶	▶	▶	▶	DPW, Plan Review
	Ensure appropriate staff receives DEQ stormwater management training and certification when made available.		▶	▶	▶	▶	DPW, Plan Review

## F. Annual Report and Program Evaluation

**Annual Report:** The Town will submit annual reports to DEQ each year covering the period of July 1st through June 30th. The reports will be submitted to DEQ no later than October 1<sup>st</sup> of each year. The information provided to DEQ will be in accordance with the provisions of 9VAC25-890-40 Section II.E.3, which includes the following:

- a) Background information:
  - i) The name and state permit number of the program submitting the annual report.
  - ii) The annual report permit year.
  - iii) Modifications to any Town roles and responsibilities.
  - iv) Number of new MS4 outfalls and associated acreage by HUC added during the permit year.
  - v) Signed certification.
- b) The status of compliance with permit conditions, an assessment of the appropriateness of the identified BMPs, and progress towards achieving the identified measurable goals for each Minimum Control Measure (MCM).
- c) Results of information collected and analyzed, including monitoring data, if any, during the reporting period.
- d) A summary of the activities the Town plans to undertake during the next reporting cycle.
- e) Any changes in identified BMPs or measurable goals for any of the MCMs, including steps to be taken to address any deficiencies.
- f) Notice that the Town is relying on another government entity to satisfy some of the state permit obligations (if applicable).
- g) The approval status of any programs pursuant to Section II C (if appropriate), or the progress toward achieving full approval of these programs.
- h) Information required for any applicable TMDL special condition contained in Section I.

In addition, the following MCM-specific items will be included in the annual report, if applicable:

- A list of the educational and outreach activities conducted during the reporting period for each high-priority water quality issue, the estimated number of people reached, and an estimated percentage of the target audience or audiences that was reached.
- A list of the education and outreach activities that will be conducted during the next reporting period for each high-priority water quality issue, the estimated number of people that will be reached, and an estimated percentage of the target audience or audiences that will be reached.
- A web link to the MS4 Program Plan and annual report.
- Documentation of compliance with public participation requirements.
- A list of any written notifications of physical interconnections given by the operator to other MS4s.
- The total number of outfalls screened during the reporting period, the screening results, and detail of any follow-up actions necessitated by the screening results.



- A summary of each investigation conducted by the operator of any suspected illicit discharge.
- The total number of regulated land-disturbing activities.
- The total number of acres disturbed.
- The total number of inspections conducted.
- A summary of enforcement actions taken, including the total number and type of enforcement actions taken during the reporting period.
- An electronic database or spreadsheet of all stormwater management facilities brought online during each reporting year.
- The total number of stormwater management facility inspections completed.
- A summary report on the development and implementation of the daily operational procedures.
- A summary report on the development and implementation of the required SWPPPs.
- A summary report on the development and implementation of the turf and landscape nutrient management plans.

**Evaluation of Effectiveness:** The Town will provide an annual evaluation of the effectiveness of BMPs during the annual reporting process, to include the effectiveness of BMPs in addressing discharges into impaired waters found in the 2010 Water Quality Assessment Integrated Report.

**Record Keeping:** The Town will keep records required by the MS4 permit for at least three years and make them available to DEQ and the public on request.

## Appendix A: Public Education and Outreach Plan





## Appendix B: Illicit Discharge Detection and Elimination Plan





## Appendix C: Construction Site and Post-Construction Stormwater Management Procedures







## Appendix D: Good Housekeeping Standard Operating Procedures





## Appendix E: TMDL Action Plans





