



RENÉE M. LaFOLLETTE, P.E., DIRECTOR
Department of Public Works and Capital Projects

25 West Market Street ■ 20176 ■ 703-771-2790 ■ Fax: 703-737-7065 ■ rlafollette@leesburgva.gov ■ www.leesburgva.gov

September 19, 2018

Anna M. Tuthill
Regional MS4 Coordinator-Inspector
Virginia Department of Environmental Quality
13901 Crown Court
Woodbridge, Virginia 22193

RE: Town of Leesburg VSMP – Phase II MS4 General Permit (VAR040059)

Dear Ms. Tuthill:

I am pleased to submit our Permit Year Five (PY5) Report prepared by the Town of Leesburg under the General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems. This report marks the completion of the Town's fifth year of working towards the goals of the six minimum stormwater control measures outlined in Virginia's General Permit and completion of the tasks identified in our Stormwater Management Plan. In PY5, the Town continued its tasks according to the current Program Plan and evaluated the plan for potential improvements.

The Town updated the storm sewer system map and the underlying outfall tables in accordance with Part II.B.3a of the MS4 permit in Year 5. During PY5, eight additional outfalls were added to the storm water assets inventory. These additional outfalls have a combined drainage area of 105 acres. This brings the total regulated outfalls from 414 to 422 outfalls.

A stormwater focused spill response training module, developed by the Town's consultant "Wood", was presented to 34 employees of the police department. The training included information from the basic training course as well as Town-specific stormwater pollution prevention protocols.

We look forward to continuing these and other endeavors in the next permit year cycle. Should you have any questions or need additional information, please contact me at 703-771-2743 or via e-mail at cmumaw@leesburgva.gov.

Sincerely,

A handwritten signature in blue ink that reads "Charles A. Mumaw".

Charles A. Mumaw, P.E.,
Manager, Department of Public Works

cc: Renée M. LaFollette, P.E., Director, Department of Public Works and Capital Projects
Nathaniel A. Ogedegbe, DCA., Senior Engineer, Public Works and Capital Projects



Permit Year 5 Annual Report Phase II Municipal Separate Storm Sewer System (MS4) Program

Permit Compliance Assessment

Permit # VAR040059

July 1, 2017 – June 30, 2018



Town of Leesburg, Virginia
25 West Market Street
Leesburg, VA 20176

Final to DEQ – September 21, 2018

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- E. MCM #5 – Post-Construction Stormwater Management
- F. MCM #6 – Pollution Prevention and Good Housekeeping
- G. TMDL Action Plan Documentation

1. 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.”

Charles A. Mumaw Manager, Public Works 9/21/18
Name Title Date

2. Introduction

This Permit Year 5 (PY5) annual report has been prepared by the Town of Leesburg Department of Public Works and Capital Projects (DPWCP) to comply with the requirements of the General Virginia Pollutant Discharge Elimination System (VPDES) Permit for Discharges of Stormwater from Small Municipal Separate Storm Sewer Systems (9VAC25-890-470 *et seq.*). The Virginia Department of Environmental Quality (DEQ) reissued General Permit #VAR040059 to the Town effective July 1, 2013. This PY5 annual report covers the fifth year of this permit.

Under the terms of the MS4 permit, the Town has developed and implemented a Municipal Separate Storm Sewer System (MS4) Program Plan designed to meet the six minimum control measures (MCMs) and to reduce the discharge of pollutants into the storm sewer system to the maximum extent practicable (MEP). The six minimum control measures include:

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

In accordance with Part II.E.3 of the MS4 permit, the Town must submit an annual report to DEQ verifying compliance with the six MCMs and documenting progress made toward implementing best management practices (BMPs) identified in the MS4 Program Plan. This PY5 annual report documents the reporting period of July 1, 2017 through June 30, 2018.

The following sections provide background information required in Part II.E.3.a (Section 3), a summary of the status of compliance with PY5 tasks by MCM as required in Part II.E.3.b and elsewhere in the MS4 permit (Section 4), and additional information required in Part II.E.3.c-h that is not otherwise covered in the previous sections (Section 5). At the end of the report are appendices with representative samples of the Town's work as well as detailed information relating to specific reporting requirements.

3. Background and Evaluation of BMPs

DPWCP continues to be responsible for overall stormwater planning, operations, and the administration of the Town's MS4 permit. There have been no changes or modifications to roles and responsibilities described in the MS4 Program Plan. The latest version of the MS4 Program Plan is located at <https://www.leesburgva.gov/home/showdocument?id=23540>. The Town is comprised of 7,983.3 acres. Based on the most recent analysis by the Town conducted as part of the Draft Phase II Chesapeake Bay TMDL Action Plan submitted to DEQ in May 2018, 5,287.37 acres drain to the MS4 regulated area within the following hydrologic unit codes (HUCs): PL5, PL15, and PL16.

During PY5, eight additional outfalls were added to the stormwater assets inventory. These additional outfalls have a combined drainage area of 105 acres. This brings the total regulated outfalls from 414 to 422 outfalls. Details are provided under BMP 3A and in Appendix C.

In accordance with Part II.E.3.b of the MS4 permit, the Town has reviewed and assessed the BMPs established to meet the requirements of the Town's permit and has found them to be appropriate and effective.

4. *Minimum Control Measures*

The following provides the status of BMPs implemented for each of the six MCMs during PY5. The MS4 permit requires the Town to annually update the MS4 Program Plan in accordance with Table 1 of the permit. The Town submitted a revised MS4 Program Plan with the PY1 annual report. Further updates have been incorporated into the MS4 Program Plan as required by the permit, which is located on the Town's web site. A description of updates to the MS4 Program Plan planned for PY5 are found in Section 5.

The full MS4 Program Plan can be downloaded at <http://www.leesburgva.gov/home/showdocument?id=21698>.

MCM #1 – Public Education and Outreach on Stormwater Impacts

Throughout PY5, the Town continued to implement a strong public education and outreach campaign using both conventional means (newspaper ads, direct mail, participation in community events, etc.) and social media (Facebook, Twitter, etc.). This has enabled the Town to reach a broad audience with a general pollution prevention message and to target specific messages regarding Town-specific pollutants of concern.

Activities this permit year included:

BMP	Task
1A	<u>General Pollution Prevention Education and Outreach</u>
1A.1	<i>Participate in the NVRC Clean Water Partners Program</i> The Town continued to participate in the Northern Virginia Regional Commission's Clean Water Partners program. Participation in this group has afforded the Town enhanced networking opportunities with neighboring communities and the ability to share ideas and resources otherwise unavailable to the Town on its own. A summary of PY5 Clean Water Partners activities is included in Appendix A.
1A.2	<i>Incorporate a Short Message on Pollution Prevention on a Town Social Media Account</i> The Town continues to use Facebook and Twitter accounts to provide an additional way for residents to find information about Town programs. As of July 2018, the Town had 7,728 Twitter followers (up from 6,087 on June 30, 2017) and 9,802 "likes" on the Town's Facebook page (up from 7,014 on June 30, 2017). This represents a significant increase from the previous year. Twitter and Facebook were used to send followers information on rain barrel workshops, Keep Leesburg Beautiful, and other environmental-related events. Screenshots documenting these activities are included in Appendix A.
1A.3	<i>Distribute Educational Materials at Appropriate Local Events and Meetings</i> On April 21 and 22, 2018, staff from the Department of Public Works and Capital Projects hosted a booth at the Town's annual Flower and Garden Festival and distributed stormwater pollution prevention educational materials to the event's participants. This

	<p>event drew upwards of 35,000 participants over the two-day weekend. Mr. Paws also made a special appearance over the weekend. This mascot is a new addition to the Town’s program. The goal is to encourage pet owners to pick up after their pets by taking the PAWS pledge. Additional details on the event are provided in BMP 1A.6.</p> <p>1A.4 <i>Host the Stormwater Webpage and Update it with New Information as Applicable</i></p> <p>The Town continues to maintain a stormwater web page, which is updated with new information as applicable. The site can be found at:</p> <p>http://www.leesburgva.gov/government/departments/public-works/water-quality-stormwater-management</p> <p>During PY5, all of the stormwater-related webpages had 1,953 page views, compared to 1,398 page views during PY4. The page offers visitors an opportunity to learn about stormwater pollution prevention, storm drain marking, and the importance of protecting water resources.</p> <p>The main page of the Town’s website also features a spotlight section, where Keep Leesburg Beautiful and other stormwater activities are highlighted and news releases are posted. See http://www.leesburgva.gov/residents/keep-leesburg-beautiful.</p>
<p>1A.5</p>	<p><i>Collaborate with Local Schools and Youth Organizations to Educate School-Aged Children</i></p> <p>In Spring of 2018, the Public Works Senior Engineer for stormwater collaborated with the Loudoun County Soil and Water Conservation District to present information on stormwater pollution prevention to four first grade classes at the Balls Bluff Elementary School. The lesson taught was called “The Incredible Journey,” where the students travel through a water cycle and create a bead bracelet while doing it. It not only reinforced their understanding of the cycle, but also highlighted the impact that people have on local waterways. The students were encouraged to ask questions and to think about how they can help to avoid polluting creeks and rivers in the future. Approximately 22 students from each of the four classes participated in the sessions.</p> <p>Each year the Town reaches out to local schools and youth groups to offer volunteer opportunities for youth to engage in stormwater pollution prevention activities. During the annual Keep Leesburg Beautiful event in April 2018, over 215 people participated in the cleanup and storm drain-marking program that include individuals, several clubs, and Town Council members. In addition, the Town Environmental Advisory Commission collaborated with the Loudoun County Soil and Water Conservation District to host four rain barrel workshops.</p>
<p>1A.6</p>	<p><i>Distribute Information on Pollution Prevention During the Annual Flower and Garden Festival</i></p> <p>As noted in BMP 1A.3, DPWCP hosted a booth at this two-day festival, which attracted approximately 35,000 visitors. Town staff, including Mr. Paws, spoke with attendees on</p>

<p>1A.7</p>	<p>various topics such as pet waste pollution control, responsible use of fertilizer and pesticides, and the use of native plants to encourage wildlife and reduce runoff. To help facilitate these messages, the Town handed out literature and yard waste and recycling stickers. Some visitors also took the PAWS for Clean Water pledge in exchange for a pet waste pickup bag dispenser. In all, the Town distributed approximately 300 pet waste pickup dispensers along with informational postcards on pet waste pollution facts. See http://www.leesburgva.gov/visitors/festivals-events.</p> <p><i>Storm Drain Marking Program</i></p> <p>The Town continued to advertise storm drain marking opportunities on the Town’s website and through informational brochures made available at various outreach events such as the Annual Flower and Garden Festival, Keep Leesburg Beautiful, and other local events. See BMP 3H and Appendix A for more details.</p>
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<p>1B</p> <p>1B.1</p> <p>1B.2</p> <p>1B.3</p>	<p><u>Bacteria from Pet Waste</u></p> <p><i>Mail a Postcard to All Single-Family/Townhome Residents on Bacteria</i></p> <p>In an effort to reach more pet owners directly, the Town utilized one of its annual Town-wide direct mail pieces to reach all residents with a pollution prevention message on the dangers of bacteria from pet waste. The direct mail piece was sent to 11,376+ addresses (single-family and townhouse units) inside the Town’s corporate limits.</p> <p>In addition, the Town’s Summer and Spring 2018 Town-wide newsletter provided information on being a responsible pet owner in relation to pollution prevention efforts. Residents were reminded that pet waste is not the same as fertilizer and contains harmful bacteria. The message was that no material, except for stormwater, should ever be directed into the storm sewer system. Copies of the postcard and newsletter are enclosed in Appendix A.</p> <p><i>Mail Information to HOAs and Property Management Companies on Bacteria</i></p> <p>A segment on pet waste pollution was included as part of the Spring mailings of newsletters sent to 39 of the HOAs in Town. Copies of the newsletters are included in Appendix A.</p> <p><i>Promote the PAWS for Clean Water Initiative</i></p> <p>The Town promoted the PAWS for Clean Water initiative at the annual Flower and Garden Festival held on April 21 and 22, 2018. Approximately 300 pet waste pickup dispensers, along with informational postcards on pet waste pollution facts were provided to the participants in exchange for taking the PAWS pledge. Photos of the dispensers are provided in Appendix A.</p>
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1B.4 *Participate in the NVRC Clean Water Partners Program*

As noted in BMP 1A.1, the Town continued to participate in the NVRC Clean Water Partners program. Bacteria is one of the program’s high priority water quality issues. From July 2017 through June 2018, advertisements featuring messages on the importance of picking up pet waste aired on 32 cable TV networks, including four Spanish speaking channels. The campaign also included a digital component. In total the campaign resulted in 5,299,360 TV impressions and 966,169 digital impressions. Based on an analysis by NVRC, the goal of reaching 20 percent of the target audience was exceeded across the region as a whole as well as in individual broadcast zones. See Appendix A for details.

The following is a summary of the Town’s outreach efforts demonstrating that it has exceeded the goal of reaching 20 percent of the target audiences identified in the MS4 Program Plan for bacteria. The summary also includes the estimated number to be reached through each strategy during the next reporting period (Section II.B.1.g(2)). However, these figures and strategies will change based on the new MS4 permit requirements and the Town’s updated MS4 Program Plan.

Strategy	Audience	% Reached in PY5	Anticipated % Reached Next Permit Year
Direct mail post-card.	Pet owners (Town-wide).	100%	100%
NVRC Clean Water Partners	Pet owners (regional effort).	79.8% of target audience reached according to NVRC	To be determined based on NVRC analysis, but expected to be similar to PY5
Online PAWS Program	Pet owners.	<1%	<1%
HOA Direct Mail	HOA & Property Management Reps (39)	100%	100%
	Total Audience Reach	100%	100%

1C **Illicit Discharges and Illegal Dumping**

In PY1, the Town revised its list of pollutants of concern and replaced motor oil with the broader issue of illicit discharge and illegal dumping for the remainder of this permit cycle. Although the Town has very few industrial facilities or large-scale production centers, illicit discharge and illegal dumping are still issues that impact residential condominium properties, smaller businesses, and especially commercial properties that house restaurants.

The Town has noticed an increase in complaints of illegal dumping related to dumpsters placed in commercial centers and felt this would be a good opportunity to address the issue

<p>1C.1</p>	<p>and make an impact on reducing the potential for pollutants from refuse, food waste, and used cooking oil to enter the storm sewer system.</p> <p><i>Mail a Postcard to All Single-Family-Townhome Residents on Illicit Discharge</i></p> <p>The Town-wide annual postcard included information about spotting and reporting suspected illicit discharges and illegal dumping. The postcard was mailed in the Spring of 2018 to 11,376+ single-family homes and town homes. A copy of the postcard is included in Appendix A.</p>
<p>1C.2</p>	<p><i>Mail Information to HOAs and Property Management Companies on Illicit Discharge</i></p> <p>The Public Works Newsletter was sent to 39 HOAs and/or property managers and included information on spotting, reporting, and preventing pollution from illicit discharges. A copy of this newsletter is included in Appendix A.</p>
<p>1C.3</p>	<p><i>Mail Letter and Tip Sheet to 25% of Restaurants Annually</i></p> <p>In June 2018, a tip sheet and cover letter were sent to 27 restaurants in the downtown area. Information was provided on the importance of maintaining control over fats, oils, and grease and ensuring this waste is not allowed to enter the storm sewer system. A copy of the flyer and letter are included in Appendix A.</p>
<p>1C.4</p>	<p><i>Participate in the NVRC Clean Water Partners Program</i></p> <p>The Town continued to participate in the NVRC Clean Water Partners program. Chemical contamination from contractors and home mechanics is one of the program’s high priority water quality issues. This has a high overlap with the Town’s focus on illicit discharges and illegal dumping. Based on an analysis by NVRC, the goal of reaching 20 percent of the target audience was exceeded across the region as a whole as well as in individual broadcast zones. See Appendix A for details.</p>
<p>1C.5</p>	<p><i>Promote Loudoun County HHW Program</i></p> <p>The Town continued to work with Loudoun County’s Office of Solid Waste Management to promote the various HHW events sponsored by Loudoun County throughout the year. These events are publicized on the Town’s Trash and Recycling Services website http://www.leesburgva.gov. The website provides information on where residents may take used/extra motor oil, antifreeze, and automotive batteries for safe disposal and recycling. The Loudoun County Solid Waste Management Facility accepts HHW year-round at no cost to the public.</p> <p>The following is a summary of the Town’s outreach efforts demonstrating that it has exceeded the goal of reaching 20 percent of the target audiences identified in the MS4 Program Plan for illicit discharges and illegal dumping. The summary also includes the estimated number to be reached through each strategy during the next reporting period (Section II.B.1.g(2)). However, these figures and strategies will change based on the new MS4 permit requirements and the Town’s updated MS4 Program Plan.</p>

Strategy	Audience	% Reached in PY5	Anticipated % Reached Next Permit Year
Promote County HHW program.	All households.	<2% (based on visits to the DPW web page)	<2% (based on visits to the DPW web page)
Direct mail post-card.	All households	100%	100%
NVRC Clean Water Partners	Contractors and home mechanics (regional effort).	75.7% (personal auto care) and 82.0% (do-it-yourselfers) reached according to NVRC.	To be determined based on NVRC analysis, but expected to be similar to FY18
HOA Direct Mail	HOA & Property Management Reps (39)	100%	100%
Letter to restaurants and similar businesses.	Restaurants and similar businesses (~141)	~19% (target this year was 27 downtown restaurants)	To be determined based on updated MS4 Program Plan
	Total Audience Reach	>20%	>20%

1D	<p><u>Nutrients</u></p> <p>The Town continued to focus on reducing sources of nutrients. Nitrogen and phosphorus are two of the pollutants that are subject to the Chesapeake Bay TMDL. During PY5 the Town sent a direct mail piece to area landscape companies promoting the safe and responsible use of lawn and garden chemicals. Similar information was also mailed to HOAs to use in their community newsletters or websites to reinforce the message in the Town’s direct mail piece.</p>
1D.1	<p><i>Mail a Postcard to All Single-Family/Townhome Residents on Nutrients</i></p> <p>The Spring 2018 postcard was mailed to all single-family and townhome residents and featured information on the potential for stormwater pollution because of incorrect fertilizer and/or pesticide and herbicide use. Residents were encouraged to take advantage of soil testing programs to determine requirements and to apply only as directed by the manufacturer.</p>
1D.2	<p><i>Mail Information to HOAs and Property Management Companies on Nutrients</i></p> <p>The Public Works Newsletter was sent to 39 HOAs and/or property managers and featured a spotlight article on illicit discharge and the PAWS for Clean Water. A copy of this newsletter is included in Appendix A.</p>

1D.3 Mail Letter and Tip Sheet to 25% of Landscape Companies Annually

A letter and tip sheet were mailed to 40 local landscape companies and included information on the responsible use of lawn and garden chemicals as well as a reminder that clippings, leaves, and other lawn waste should not be blown, hosed, or swept into the storm sewer system. A copy of the letter and flyer are provided in Appendix A.

1D.4 Participate in the NVRC Clean Water Partners Program

The Town continued to participate in the NVRC Clean Water Partners program. Nutrients from homeowners that apply fertilizers is one of the program’s high priority water quality issues. The 2018 NVRC summary survey indicated that approximately 33% of regional homeowners apply fertilizer more than once per year. However, most Northern Virginia lawns only require fertilization once during the Fall or not at all depending on the results of a soil test. As a result, more outreach is needed in this area. Based on an analysis by NVRC, the goal of reaching 20 percent of the target audience was exceeded across the region as a whole as well as in individual broadcast zones. See Appendix A for additional details.

The following is a summary of the Town’s outreach efforts demonstrating that it has exceeded the goal of reaching 20 percent of the target audiences identified in the MS4 Program Plan for nutrients. The summary also includes the estimated number to be reached through each strategy during the next reporting period (Section II.B.1.g(2)). However, these figures and strategies will change based on the new MS4 permit requirements and the Town’s updated MS4 Program Plan.

Strategy	Audience	%Reached in PY5	Anticipated % Reached Next Permit Year
Direct mail post-card.	All households	100%	100%
NVRC Clean Water Partners	Homeowners that apply fertilizer (regional effort).	81.5% of target audience reached according to NVRC.	To be determined based on NVRC analysis, but expected to be similar to FY18
HOA Direct Mail	Property Management Reps (39)	100%	100%
Letter and tip sheet to landscape companies.	Landscape in the area companies (40).	100%	100%
	Total Audience Reach	>20%	>20%

MCM #2 – Public Involvement and Participation

The Town of Leesburg has sought to broaden public involvement and participation in pollution prevention efforts and to ensure that residents have an opportunity for input into the Town’s planning process. Activities this permit year included:

2A	<p><u>Public Notice and Participation</u></p>
2A.1	<p><i>Meet All Public Notice Obligations</i></p> <p>The Town posted the PY4 annual report and update to the MS4 Program Plan on the stormwater pollution and prevention section of the Town’s website.</p>
2A.2	<p><i>Post Each Updated MS4 Program Plan to the Webpage within 30 Days of the Submittal of the Annual Report</i></p> <p>The updated MS4 Program Plan incorporating changes required in PY4 is located at http://www.leesburgva.gov/home/showdocument?id=21698. The next version of the MS4 Program Plan will be posted on the Town’s website after it is completed in accordance with the new MS4 permit requirements.</p>
2A.3	<p><i>Post the Annual Report on the Web Page Within 30 Days of Submittal to DEQ</i></p> <p>The Town will post the PY5 annual report within 30 days of submittal to DEQ for review. The information will be found at the following:</p> <p>http://www.leesburgva.gov/government/departments/public-works/water-quality-stormwater-management/ms4-permit-annual-reports</p>
2A.4	<p><i>Prior to Reapplication for Renewed Permit Coverage, Provide for Comment on the Proposed MS4 Program Plan</i></p> <p>An updated MS4 Program Plan was not required to be submitted with the reapplication for renewed permit coverage. The Town will continue to implement the current MS4 Program Plan until the new MS4 permit is adopted by the State Water Control Board. The Town will then update the MS4 Program Plan in accordance with the requirements of the new permit, including requirements for public comments, if any.</p>
2B	<p><u>Environmental Advisory Commission</u></p> <p>During PY5, Town staff attended EAC meetings on September 5, 2017, October 3, 2017, and May 1, 2018 to provide information on the Town’s MS4 permit program efforts to improve water quality, the new solid waste contract, herbicide alternative products, and recycling efforts and initiatives. Copies of the meeting minutes and presentations are included in Appendix B</p>

<p>2C</p>	<p><u>Promote and Support Four Local Activities</u></p>
<p>2C.1</p>	<p>The MS4 permit requires the Town to promote, sponsor, or support a minimum of four local activities annually. The Town engaged in the following activities to meet this requirement. These activities are documented in Appendix B.</p> <ul style="list-style-type: none"> • The EAC hosted four rain barrel workshops in PY5 and offered discounts on rain barrel purchases to Town residents who attended. Details and dates are shown on the flyer, provided in Appendix B. • In April 2018, the Town sponsored the annual month-long Keep Leesburg Beautiful event, which promotes trash cleanup along streams and waterways, in communities and parks as well as offering the opportunity to perform storm drain marking or inventory activities. Town Council members and Town staff members held a contest to see which group could collect the most trash. In all, 215 individuals participated in the cleanup exercises throughout the Town, with several Boy Scout and Girl Scout troops and other clubs participating. The Town collected 2,110 pounds of debris and litter at the conclusion of the Keep Leesburg Beautiful event. • On April 21-22, 2018, the Town’s largest event, the annual Flower and Garden Festival, attended by 35,000 visitors, provided another opportunity to reach out to residents with the pollution prevention message. • On September 9, 2017, the Town’s Parks and Recreational Department hosted an annual Dog Swim event “Leesburg Is Going to the Dogs” at AV Symington Aquatic Center. Town staff distributed 125 dog waste pickup dispensers along with informational postcards on pet waste pollution facts. • On May 5, 2018, at the Foxridge Park Pond, Leesburg residents celebrated the completion of stormwater pollutant reduction efforts by joining Mayor Burk and Council Member Vanessa Maddox, where volunteers planted native milkweed surrounding the edges of the stormwater detention pond to create a Monarch butterfly waystation. Mr. Paws was on hand, encouraging people to take the “PAWS for Clean Water” pledge to always pick up after their pets. Pet waste is the number one source of E. coli bacteria in area creeks and streams.
<p>2C.2</p>	<p><i>Continue to Include Guidelines for Promoting Volunteer Opportunities to the Web Page</i></p> <p>The Town continues to host the website and Public Works pages, which include information on the stormwater program and the process for advertising volunteer opportunities for non-profit organizations. A printout of the website is included in Appendix B.</p>

MCM #3 – Illicit Discharge Detection and Elimination

The Town has continued to implement a comprehensive program aimed at better understanding the Town’s storm sewer network, detecting and eliminating illicit discharges and illegal dumping, and to educate the public on options for proper disposal of hazardous household waste. Per the requirements of the MS4 permit, the Town has previously reviewed and updated its Illicit Discharge Detection and Elimination (IDDE) plan to ensure it meets all the specified components outlined in the new permit. A copy of the plan is included in the MS4 Program Plan.

Activities this permit year included:

BMP	TASK
3A	<u>Storm Sewer System Map</u>
3A.1	<p><i>Maintain Accurate Storm Sewer System Map</i></p> <p>The Town continues to maintain an up-to-date storm sewer system GIS map. The Town works with Loudoun County’s mapping department to import new layers and data as they update their mapping files.</p>
3A.2	<p><i>Ensure Compliance with Section 13-71 that Requires Developers to Provide a Digital Image File</i></p> <p>The Department of Public Works and Capital Projects requires that developers provide a digital file of the as-built construction drawings to help in the process of mapping the Town’s stormwater assets. This process is ongoing.</p>
3A.3	<p><i>Identify Any New Interconnections and Notify Adjacent MS4s as Applicable</i></p> <p>During the first permit cycle, the Town identified and mapped physical interconnections with the Loudoun County and VDOT MS4s and provided them with the required notice.</p> <p>There were five new interconnections with Loudoun County’s MS4 that were added to the Town’s inventory during PY5. A notification letter has been sent to the Loudoun County notifying them of these interconnections. There were no new interconnections with VDOT. A copy of the letter can be found in the Appendix C.</p>
3A.4	<p><i>Update the Outfall Tables in Accordance With the Permit</i></p> <p>There were eight additional outfalls with a combined drainage area of 105 acres added to the stormwater assets inventory during PY5. This brings the total regulated outfalls from 414 to 422 outfalls. Details are provided in Appendix C.</p>

<p>3B</p>	<p><u>Enforce Town Code Prohibitions Against Illicit Discharges</u></p> <p>Article II of Chapter 14 of the Town Code provides authority for enforcement and right-of-way entry related to prohibited non-stormwater discharges in the Town. The Town Council updated the Town Code in April 2014 as part of the larger effort to comply with the Virginia Stormwater Management Program Regulations.</p>								
<p>3C</p> <p>3C.1</p>	<p><u>Revise Written Procedures for Illicit Discharges and Illegal Dumping</u></p> <p><i>Implement Revised IDDE Procedures</i></p> <p>The Town has established training programs to educate applicable staff on the IDDE plan. Training on the IDDE plan is found in BMP 6.D.</p>								
<p>3D</p> <p>3D.1</p>	<p><u>Dry Weather Outfall Reconnaissance</u></p> <p><i>Conduct Dry Weather Outfall Reconnaissance on 50 Outfalls Annually</i></p> <p>Based on a prioritization assessment conducted in PY2 and in accordance with the MS4 permit, Town staff inspected 51 outfalls during PY5. During the inspection process, the Town also identified and implemented basic maintenance on 39 of the outfalls. No indications of illicit discharge were found during the inspection process.</p> <table border="1" data-bbox="537 1016 1214 1178"> <thead> <tr> <th rowspan="2">Permit Year</th> <th colspan="2">Outfalls to be Inspected</th> </tr> <tr> <th>MS4 Plan</th> <th>Completed</th> </tr> </thead> <tbody> <tr> <td>PY5 Total</td> <td>50</td> <td>51</td> </tr> </tbody> </table> <p>A list of the outfalls inspected and their status is included in Appendix C.</p>	Permit Year	Outfalls to be Inspected		MS4 Plan	Completed	PY5 Total	50	51
Permit Year	Outfalls to be Inspected								
	MS4 Plan	Completed							
PY5 Total	50	51							

<p>3E</p> <p>3E.1</p> <p>3E.2</p>	<p><u>Public Reporting of Suspected Illicit Discharges and Illegal Dumping</u></p> <p><i>Continue to Operate the “Report a Problem” Feature for Public Complaints</i></p> <p>The Town provides an online reporting form that allows residents to contact DPWCP to report a suspected illicit discharge or illegal dumping. The Town’s web reporting form has a link on the home page and is found here in full:</p> <p>http://www.leesburgva.gov/government/departments/public-works/water-quality-stormwater-management/illegal-discharge-information-and-reporting</p> <p><i>Include the “Illegal Discharge Information Reporting” Function in the Postcard as Part of BMP 1.C</i></p> <p>The Department of Public Works and Capital Projects created an online form during PY3 to allow residents to easily submit reports of suspected illicit discharge activity online. The reference to the online reporting feature was included in the PY5 version of the post card.</p> <p>http://www.leesburgva.gov/government/departments/public-works/water-quality-stormwater-management</p>
<p>3F</p> <p>3F.1</p>	<p><u>Illicit Discharge Tracking</u></p> <p><i>Maintain the Tracking Database</i></p> <p>The Town continued to track and process complaints or information about potential illicit discharges. As noted in BMP 3.D, no suspected illicit discharges were detected during dry weather outfall reconnaissance. In addition, no suspected illicit discharges were reported to the Town through the “Report a Problem” feature or otherwise required attention by the Town. As a result, there is no summary list of investigations conducted of suspected illicit discharges by the Town.</p>
<p>3G</p> <p>3G.1</p>	<p><u>Household Hazardous Waste (HHW) Program and Events</u></p> <p><i>Promote Household Hazardous Waste (HHW) Program and Events</i></p> <p>The Town is an active supporting partner of Loudoun County’s HHW program. In PY5, Loudoun County had four events, one of which was in the Leesburg area (Leesburg Park & Ride). The Town also posts updated information on the Town website, advising residents of upcoming events. As an added promotional opportunity, as members of the NVRC Clean Water Partners, the e-newsletter and the Clean Water Partners website also link to and list information on the HHW events Loudoun County has scheduled. Copies of the press releases/news items are included in Appendix A.</p>

<p>3H</p>	<p><u>Storm Drain Marking Program</u></p>
<p>3H.1</p>	<p><i>Continue Storm Drain Marking Program</i></p> <p>The Town continued to advertise storm drain marking opportunities on the Town’s website and through informational brochures made available at various outreach events such as the Annual Flower and Garden Festival, Keep Leesburg Beautiful, and other local events. The Town has also posted information on the local cable access channel and the Town’s website.</p> <p>In an effort to streamline the process of installing storm drain markers and to gather a more complete inventory, in PY5 the Town offered an opportunity for residents to participate in an inventory of the storm drain inlets in their community in addition to the actual marking of inlets. The information gathered helped the Town account for the number of marked drains, those needing decals, and the condition of the inlet itself. In addition, the Town distributed 59 storm drain decals to the residents for the replacement of missing decals. See Appendix C for details.</p>

MCM #4 – Construction Site Stormwater Runoff Control

The Town, through its partnership with Loudoun County, continues to implement procedures to reduce pollutants that could result from construction activities.

Activities this permit year included:

4A	<p><u>Maintain Local Program Consistency</u></p>
4A.1	<p><i>Implement Program Consistent with State Law and Regulations</i></p> <p>The Town and Loudoun County continue to implement E&S controls based on a Memorandum of Understanding provided to DEQ during the previous permit cycle.</p> <p>Additionally, the Town adopted revisions to the Town Code consistent with the Virginia Stormwater Management Regulations and received approval on June 13, 2014 to administer the VSMP regulations at the local level.</p>
4A.2	<p><i>Train All Plan Review, Inspection, and Enforcement Staff in Accordance with State Law and Regulations</i></p> <p>The Town has six staff members who maintain E&S control certification: two staff members with Inspectors certification, three staff members with Dual Combined Administrator certification, one staff member with dual inspector certification. Staff members participate in training and recertification as required each year.</p> <p>No changes to the program have been made that would affect compliance with the VSMP regulations.</p>
4B	<p><u>Track and Report Land Disturbing Activities</u></p> <p><i>Track All Land Disturbing Activities in Accordance with Permit Requirements</i></p> <p>Loudoun County, as provided for by the MOU, issues grading permits for projects in the Town and monitors E&S control measures. The Town has access to the County’s Land Management Information System (LMIS) and tracks projects within the corporate limits that have been issued a grading permit by the County. During PY5, 22 projects occurred that disturbed 387.36 acres. There were seven “Notice to Comply” action taken during the PY5 period.</p> <p>Per the MOU, Loudoun County is responsible for performing inspection and enforcement, as applicable. A list of all land disturbing activities for which permits were issued during PY5 has been included in Appendix D.</p>

4C	<u>Public Reporting of Suspected Erosion and Sediment Control Violations</u>
4C.1	<i>Maintain Public Complaint Mechanisms</i>
	<p>The Town has continued to promote the ability of residents and staff members to report violations associated with construction activity and erosion and sediment control requirements. There was only one potential violation reported to the Town during this permit year. Upon investigation, the County issued a stop work order and notice of permit requirement to the property owner. A copy of the stop work order and notice of permit requirement is provided in Appendix D.</p>
	<p>The Town of Leesburg website has several pages dedicated to this topic. Residents may report suspected incidents by calling the DPWCP office, Police Department, or by completing the on-line reporting form.</p>
	<p>The webpage can be found here: http://www.leesburgva.gov/government/departments/public-works/water-quality-stormwater-management/illegal-discharge-information-and-reporting.</p>

MCM #5 – Post-Construction Stormwater Management

The Town has continued to develop, implement, and enforce measures to address stormwater runoff from all new and re-development sites within the Town. The Town continually reviews existing protocols and works to ensure that the procedures in place adequately protect the Town’s water resources.

5A	<u>Maintain Local Program Consistency</u>
5A.1	<p><i>Implement Program Consistent with State Law and Regulations</i></p> <p>The Town continues to implement a post-construction stormwater management program consistent with state regulations.</p> <p>The Town Code was updated in 2014 to incorporate the plan review, inspection and enforcement, water quality and water quantity requirements of the Virginia Stormwater Management Program (VSMP) regulations. In addition, Section 5-300 of the Design and Construction Standards Manual (DCSM) was revised for consistency with the VSMP regulations, the Virginia BMP Clearinghouse, and Virginia BMP Handbook. The Town received approval on June 13, 2014 to administer the VSMP regulations at the local level effective July 1, 2014.</p> <p>Copies of both updated regulations are available upon request.</p>
5A.2	<p><i>Train All Plan Review, Inspection, and Enforcement Staff in Accordance with State Law and Regulations</i></p> <p>The Town has six staff members who maintain DEQ Stormwater Management certification: one staff member with Plan Reviewer certification, three staff members with Dual Combined Administrator certification, one staff member with dual inspector certification and one staff member with Stormwater Management Inspector certification. Staff members participate in training and recertification as required each year.</p> <p>No changes to the program have been made that would affect consistency with the VSMP regulations. Copies of the certificates are included in Appendix E.</p>

<p>5B</p> <p>5B.1</p> <p>5B.2</p>	<p><u>Stormwater Facility Tracking</u></p> <p><i>Track Information on All New Facilities in Accordance with Permit Requirement</i></p> <p>In PY5, four BMPs were added to the inventory of BMPs (one privately-owned and three publicly-owned). A summary containing required information for BMPs brought online in PY5 is provided in Appendix E and as an Excel file submitted with the annual report.</p> <p><i>Track Information on All Enforcement Activities</i></p> <p>There were no enforcement actions required to obtain compliance during PY5.</p>
<p>5C</p> <p>5C.1</p> <p>5C.2</p> <p>5C.3</p> <p>5C.4</p>	<p><u>Stormwater Facility Maintenance and Inspection Program</u></p> <p><i>Enforce Provisions that Require BMP Maintenance Agreements and Easements</i></p> <p>As a condition for construction drawings approval, the Town requires maintenance agreements for SWM BMPs and a maintenance report for each privately-owned BMP to be certified in accordance with the Town’s stormwater management ordinance and submitted to the Town by the owner no later than December 31st of each year.</p> <p><i>Require Private BMP Owners to Provide Maintenance Letters Annually. Initiate Appropriate Enforcement Action as Necessary</i></p> <p>The Town currently has 41 owners with privately-owned BMPs and annually provides a notice to the owners about their maintenance and reporting requirements. During PY5, all 41 owners of privately owned BMPs returned their certification reports. The Town will utilize enforcement measures for compliance as necessary.</p> <p><i>Conduct Inspection of All Privately Owned Facilities Once Every Five Years.</i></p> <p>The Town conducts inspections of all privately-owned facilities at least once every five years. There are currently 41 sites with privately-owned water quality BMPs and 39 sites with privately-owned SWM ponds (quantity control only). In PY5, the Town inspected 18 of the 41 water quality BMPs and seven of the 39 SWM ponds. This schedule ensures that all facilities are inspected in accordance with the five year schedule. The PY5 inspections noted that seven privately-owned water quality BMPs require follow-up and maintenance repairs. No deficiencies were noted for the SWM ponds. Owners of privately-owned water quality BMPs in need of follow up and repairs are notified through the mail. The letter requires the owner to respond with an action plan within 30 days. A copy of the inspection spreadsheet is included in Appendix E.</p> <p><i>Conduct Inspection of All Publicly Maintained BMPs Per the “Alternative Schedule”</i></p> <p>The Town performed inspections on 18 publicly-owned BMPs facilities. Fourteen BMPs required follow up. The Street Maintenance Division has since completed all repairs. A copy of the inspection spreadsheet is included in Appendix E.</p>

MCM #6 – Pollution Prevention and Good Housekeeping for Municipal Operations

The Town promotes stormwater best management practices by educating staff members on the importance of good housekeeping practices and engaging in work methods that minimize the possible harmful effects of stormwater pollution and illicit discharges on local water quality. By educating new and existing staff members on the signs of illicit discharges and general good business practices, the Town can expand its ability to detect possible illicit activities and prevent pollution from municipal operations.

<p>6A</p> <p>6A.1</p>	<p><u>Street Sweeping Program</u></p> <p><i>Continue Street Sweeping Program</i></p> <p>The Street Maintenance Division operates its own street sweeper as part of the Town’s efforts to keep trash and debris from entering the storm drain system. The street sweeper covered over 257 lane miles in the Town and collected 467 tons of debris that were taken to the landfill for disposal. The downtown historic district is swept on Monday and Friday mornings, the NE/NW quadrants are swept on Monday and Thursday, and the SE/SW are swept on Tuesday and Friday. Areas unable to be swept on the scheduled dates due to weather or other conditions are swept on Wednesdays.</p>
<p>6B</p> <p>6B.1</p> <p>6B.2</p>	<p><u>Herbicide and Pesticide Applicator Certifications</u></p> <p><i>Maintain Certifications for All Employees Handling Pesticides and Herbicides</i></p> <p>The Department of Parks and Recreation coordinates with the Department of Public Works and Capital Projects to ensure all employees who apply herbicides or pesticides are properly trained in safe application procedures and maintain all required certifications. Copies of the most recent certificates are included in Appendix F.</p> <p><i>If Contract Applicators are Used, Ensure They Receive the Proper Training and Certifications.</i></p> <p>The Town of Leesburg also contracts with private companies for certain pesticide and herbicide applications. Per the MS4 Program Plan, a copy of the applicator certificate for the Town’s current contractor, TruGreen and Permatreat are included in Appendix F.</p>
<p>6C</p> <p>6C.2</p>	<p><u>Turf and Landscape Nutrient Management Plans</u></p> <p><i>Develop And Implement NMPs</i></p> <p>The Town fulfilled the requirements for this section during the PY4. Four NMPs were developed (Freedom Park, Robinson Park, Ida Lee Park, and Foxridge Park) covering 182.4 acres. NMPs are located on-site and are available upon request.</p>

6D	<p><u>Training of Field Personnel on Recognizing and Reporting Illicit Discharges</u></p> <p>Training is provided on a biennial basis and was last provided in PY4. No training was required for PY5.</p>
6E	<p><u>Training on Good Housekeeping and Pollution Prevention for Maintenance, Public Works, and Recreation Facility Staff</u></p> <p>Training on good housekeeping and pollution prevention practices was provided using a centralized web based application on the Town's TOLNET (Town of Leesburg Net). Eighty (80) employees participated in the TOLNET training. A copy of the sign-up sheets and PowerPoint presentation is included in Appendix F.</p>
6F	<p><u>Emergency Spill Response Training</u></p> <p>6F.1 <i>Require New Police Officers to Have Emergency Spill Response Training</i></p> <p>Per the MS4 permit, the Town must provide a description of the training or certification provided to new emergency response employees. Fire and Rescue is the responsibility of Loudoun County. Town Police are trained as part of their initial certification with the Northern Virginia Criminal Justice Training Academy. A copy of the training syllabus from the Academy is included in Appendix F.</p> <p>6F.2 <i>Develop and Implement a Refresher Training Module on Emergency Spill Response</i></p> <p>A stormwater-focused spill response module developed by the Town's consultant "Wood" was distributed to Town Police through the Police Chief. The training includes information from the basic training course as well as Town-specific stormwater pollution prevention protocol. Thirty-four employees from the Police Department participated in the training. A copy of the sign-up sheet and training module is included in Appendix F.</p>
6G	<p><u>Stormwater Pollution Prevention Plans for High-Priority Facilities</u></p> <p>6G.1 <i>Implement Industrial Stormwater SWPPPs Under VPDES Permits</i></p> <p>SWPPPs have been developed and are being implemented in accordance with VPDES industrial stormwater permit requirements. Facilities include Leesburg Municipal Airport, the Water Pollution Control Facility, and the Central Maintenance Facility. Copies of these SWPPPs are kept on-site and are available on request.</p>

<p>6H</p> <p>6H.1</p> <p>6H.2</p> <p>6H.3</p>	<p><u>Good Housekeeping Standard Operating Procedures for Daily Operations</u></p> <p><i>Implement Pollution Prevention SOPs</i></p> <p>The Town continued to implement pollution prevention SOPs during PY5.</p> <p><i>Review Town-wide Stormwater SOPs Once Annually and Update as Necessary</i></p> <p>The Town reviewed the SOPs during PY5 to ensure they included all information necessary to address potential sources of pollution from municipal operations. There were no comments received from departments and the SOPs were not revised for PY5.</p> <p><i>Incorporate SOPs into Training Under 6.E, As Appropriate</i></p> <p>The Town’s SOP guidelines mirror the information provided in the IDDE and Good Housekeeping training modules. Both aspects are included in the annual training, making the SOPs part of the educational program for staff.</p>
<p>6J</p> <p>6J.1</p> <p>6J.2</p>	<p><u>Proper State Certification for Erosion and Sediment Control</u></p> <p><i>Continue to Require Appropriate Staff to Obtain and Maintain the Required E&SC Certification.</i></p> <p>All applicable Town staff are appropriately certified in erosion and sediment control per MCM #4 and MCM #5. Copies of certifications are included in Appendix F.</p> <p><i>Ensure Appropriate Staff Receives DEQ Stormwater Management Training and Certification When Made Available</i></p> <p>All applicable Town staff are appropriately certified in stormwater management per MCM #4 and MCM #5. Copies of certifications are included in Appendix F.</p>

5. *Additional Annual Report Requirements*

Results of Information Collected and Analyzed

No information, including monitoring data, was required to be collected or analyzed under the PY5 requirements.

Summary of Next Year's Planned Activities

Part II E 3 of the MS4 permit requires a summary of the stormwater activities the Town plans to undertake during the next reporting period. As noted previously, the State Water Control Board is in the process of adopting a new MS4 permit and the Town's existing MS4 permit has been administratively continued. The Town will continue to implement the existing MS4 permit and the MS4 Program Plan until such time that the new permit is issued. The MS4 Program Plan and associated BMPs will then be updated in accordance with the new MS4 permit requirements. At a minimum, in the next fiscal year the Town plans to update the MS4 Program Plan and Education and Outreach Plan, as well as develop the Final Phase II Chesapeake Bay TMDL Action Plan.

Changes in Identified BMPs or Measurable Goals

The Town has not identified any changes in BMPs or measurable goals. BMPs and measurable goals will be updated with a new MS4 Program Plan once the new MS4 permit is issued.

6. *Reliance on Other Government Entities*

The Town currently provides funding to the Northern Virginia Regional Commission to conduct supplemental public education and outreach activities through the Clean Water Partners program.

The Town completed and ratified the Memorandum of Understanding for Loudoun County to provide E&SC program enforcement for the Town. A copy of the MOU was included during the first permit cycle; a copy of the MOU is available upon request.

7. *Approval Status of Qualifying Local Programs*

The Town relies on the Virginia Erosion and Sediment Control Regulations, which are administered by Loudoun County through an MOU, to satisfy the requirements of Minimum Control Measure #4 – Construction Site Stormwater Runoff Control. Loudoun County's program has been reviewed by the state and found consistent with state laws and regulations.

Per the Virginia Stormwater Management Regulations, the Leesburg Town Code was amended and adopted that incorporates new construction site stormwater runoff control requirements, as well as new post-construction stormwater management requirements. The Town submitted the requisite applications and was approved as a local Virginia Stormwater Management (VSMP) authority on June 13, 2014 by DEQ to administer the program.

8. *Special Conditions Associated with TMDLs*

Section I of the MS4 permit requires the Town to develop action plans to address TMDLs where a wasteload allocation (WLA) has been assigned to the MS4. The Town has developed and submitted a Chesapeake Bay TMDL Action Plan and a Goose Creek Benthic TMDL Action Plan to DEQ. The following tables provide an update on progress made toward implementing pollutant reductions as provided in the action plans.

Chesapeake Bay TMDL Action Plan

The following table summarizes progress made by the Town to implement the Chesapeake Bay TMDL Action Plan. The Town has already implemented reductions in excess of the 5% permit requirement for all pollutants of concern. Documentation of completed reductions achieved during PY5 is contained in Appendix G.

Means and Methods	Status Narrative	Planned Reductions from Approved Chesapeake Bay TMDL Action Plan			Total Reductions Achieved To-Date		
		TN (lbs/yr)	TP (lbs/yr)	TSS (lbs/yr)	TN (lbs/yr)	TP (lbs/yr)	TSS (lbs/yr)
Redevelopment	The Town included pollutant reductions achieved because of redevelopment through June 30, 2014 in the Chesapeake Bay TMDL Action Plan. Two additional redevelopment projects were completed between July 1, 2014 and June 30, 2016 and reported in PY3. One additional project was completed in PY4. No additional projects were completed in PY5.	65.31	21.52	8,455.73	132.79	32.62	13,659.38
Stormwater Facilities Between January 2006 and July 2009	The Town included pollutant reductions achieved by stormwater management facilities installed from January 1, 2006 through June 30, 2009 in the Chesapeake Bay TMDL Action Plan. This was a one-time reduction and no further reductions have been achieved.	187.87	68.72	29,958.45	187.87	68.72	29,958.45

Means and Methods	Status Narrative	Planned Reductions from Approved Chesapeake Bay TMDL Action Plan			Total Reductions Achieved To-Date		
		TN (lbs/yr)	TP (lbs/yr)	TSS (lbs/yr)	TN (lbs/yr)	TP (lbs/yr)	TSS (lbs/yr)
Town-Initiated Projects	The Town proposed several retrofit projects as documented in the Chesapeake Bay TMDL Action Plan. Three projects (Foxridge, Greenway, and Stratford) were completed during PY5. Calculations are documented in Appendix G.	1,921.91	215.73	244,266.69	1,257.06	105.46	123,557.24
Street Sweeping	The Town included in the Chesapeake Bay TMDL Action Plan pollutant reductions from street sweeping based on an average of 332 tons of debris annually. In PY5, the Town swept 467 tons. The calculation for converting tons of debris is included in Appendix G.	1,137.50	455.00	136,500.00	1,634.50	653.80	196,140.00
More Stringent Regulation of Land Disturbing Activities	The Town stated that it would take credit for pollutant reductions in excess of state minimum standards of the Virginia Stormwater Management Regulations. Credit was taken in PY3. No additional credit is being taken for PY4 or PY5.	0.00	0.00	0.00	2.01	0.15	0.00
Additional Means and Methods	The Town stated that it might take additional credit for other practices allowed in DEQ’s Chesapeake Bay TMDL Special Condition Guidance. No additional means and methods have been employed at this time.	0.00	0.00	0.00	0.00	0.00	0.00

		Planned Reductions from Approved Chesapeake Bay TMDL Action Plan			Total Reductions Achieved To-Date		
Means and Methods	Status Narrative	TN (lbs/yr)	TP (lbs/yr)	TSS (lbs/yr)	TN (lbs/yr)	TP (lbs/yr)	TSS (lbs/yr)
Total		3,312.59	760.97	419,180.87	3,214.23	860.74	363,315.06

Pollutant	5% Reduction Requirement from Permit	Planned Reductions from Approved Action Plan	Reductions Achieved To-Date	Remaining Reduction Required to Meet 5%
Total Nitrogen	256.86	3,312.59	3,214.23	(2,957.37)
Total Phosphorus	29.96	760.97	860.74	(830.78)
Total Suspended Sediment	24,899.59	419,180.87	363,315.06	(338,415.47)

Benthic TMDL Action Plan for Goose Creek

The following table summarizes progress made by the Town to implement the Goose Creek Benthic TMDL Action Plan. Documentation of completed reductions achieved during PY4 is contained in Appendix G.

		Planned Reductions from Approved Benthic TMDL Action Plan for Goose Creek	Total Reductions Achieved To-Date
Means and Methods	Status Narrative	TSS (lbs/yr)	TSS (lbs/yr)
Redevelopment	The Town included pollutant reductions achieved because of redevelopment through June 30, 2014 in the Benthic TMDL Action Plan for Goose Creek. Two additional redevelopment projects were completed between July 1, 2014 and June 30, 2016 and one additional project was completed between July 1, 2016 and June 30, 2017 within the Goose Creek watershed. No additional projects were completed in PY5.	8,180	13,383.67
Town-Initiated Projects	All retrofit projects in the Chesapeake Bay TMDL Action Plan are located within the Goose Creek watershed. Three projects were completed in PY5. See the Chesapeake Bay TMDL Action Plan status report above for details.	246,230	123,557.24

		Planned Reductions from Approved Benthic TMDL Action Plan for Goose Creek	Total Reductions Achieved To-Date
Means and Methods	Status Narrative	TSS (lbs/yr)	TSS (lbs/yr)
Street Sweeping	The Town calculated that approximately 93% of the impervious area of the Town is within the Goose Creek watershed. As noted in the above Chesapeake Bay TMDL summary, the Town achieved a 467 ton/year reduction from street sweeping in PY5. In accordance with the action plan, 93% of this amount is allocated to the Goose Creek watershed.	126,945	182,410.20
Total		381,355	319,351.11

Pollutant	Existing Load from Goose Creek Portion of the MS4	Planned Reductions from Approved Action Plan	Reductions Achieved
Total Suspended Sediment	2,644,048	381,355	319,351.11