



# Phase II Municipal Separate Storm Sewer System (MS4) Program Permit Compliance Assessment Permit # VAR040059

## Permit Year 1 Annual Report July 1, 2018 – June 30, 2019



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

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**A. General Information**

**1. Permit Information**

Permittee: Town of Leesburg  
System Name: Town of Leesburg Phase II Municipal Separate Storm Sewer System (MS4)  
Permit Number: VAR040059

**2. Reporting Period**

July 1, 2018 – June 30, 2019

**3. 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.”

Name Rene M. L. Follette Title Director, Public Works & Capital Projects Date Sept 27, 2019

## **4. Annual Reporting**

### ***Introduction***

This Permit Year 1 (PY1) 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 November 1, 2018. This PY1 annual report covers the reporting period of July 1, 2018 through June 30, 2019.

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**

The MS4 Program Plan has been updated to address the current MS4 permit and can be found at the following web site: <https://www.leesburgva.gov/government/departments/public-works/water-quality-stormwater-management>

In accordance with Part I.D.2.d 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.

### ***Summary of Compliance for Permit by MCM Task***

The following provides the status of BMPs implemented for each of the six MCMs during PY1.

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

Throughout PY1, 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:

**MCM #1 Tasks - Public Education and Outreach on Stormwater Impacts**

BMP	Task
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<b>1.A</b>	<b><u>1.A – General Pollution Prevention Education and Outreach</u></b>
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- |             |  |
|-------------|--|
| <b>1.A1</b> | <p><b><i>Include links to pollution prevention materials on the Town stormwater website.</i></b><br/>                 The Town maintains links to a wide variety of pollution prevention information.</p> <ul style="list-style-type: none"> <li>• <b><u>General Information:</u></b><br/> <a href="http://www.leesburgva.gov/government/departments/public-works/water-quality-stormwater-management">http://www.leesburgva.gov/government/departments/public-works/water-quality-stormwater-management</a></li> <li>• <b><u>Publications, Links, and Press Releases:</u></b><br/> <a href="https://www.leesburgva.gov/government/departments/public-works/water-quality-stormwater-management/information-publications-links-and-press-releases">https://www.leesburgva.gov/government/departments/public-works/water-quality-stormwater-management/information-publications-links-and-press-releases</a></li> <li>• <b><u>Storm Drain Marking Program:</u></b><br/> <a href="https://www.leesburgva.gov/government/departments/public-works/water-quality-stormwater-management/storm-drain-marking-program">https://www.leesburgva.gov/government/departments/public-works/water-quality-stormwater-management/storm-drain-marking-program</a></li> <li>• <b><u>Illicit Discharge Information and Reporting:</u></b><br/> <a href="https://www.leesburgva.gov/government/departments/public-works/water-quality-stormwater-management/illegal-discharge-information-and-reporting">https://www.leesburgva.gov/government/departments/public-works/water-quality-stormwater-management/illegal-discharge-information-and-reporting</a></li> </ul> |
|-------------|--|

<b>1.A2</b>	<p><b><i>Distribute pollution prevention materials at Town-sponsored programs and events.</i></b>                  The following is the list of Town-sponsored programs and events where pollution prevention information and/or materials were provided to the participants. Copies of the materials are included in Appendix A.</p>
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Event - Description	Time Period	Materials Distributed
Booth at the Flower and Garden Festival	April 27 - 28, 2019	300 stormwater pollution prevention handouts that address illicit discharge and dumping, pet waste, and fertilizer techniques; 250 pet waste dispensers; 245 yellow stress relievers; and, 300 Environmental Advisory Committee tote bags.
Keep Leesburg Beautiful Trash Clean Ups	April 1 - 30, 2019	150 Keep Leesburg Beautiful tote bags; 150-yard waste and brush flyers, 150 stormwater brochures; and, 150 shred events flyers.
PAW Program -“Leesburg Is Going to the Dogs” at AV Symington Aquatic Center – Ida Lee Park.	September 9, 2018	250 dog waste pickup dispensers along with informational postcards on pet waste pollution facts.

**MCM #1 Tasks - Public Education and Outreach on Stormwater Impacts**

<p><b>1.A3</b></p>	<p><b><i>Sponsor and promote a storm drain marking program.</i></b>                  The Town continued to advertise storm drain marking opportunities on the Town’s website (see 1.A1) and through informational brochures made available at outreach events (see 1.A2). During PY1, 30 volunteers from five groups including Girls Scouts, Cub Scouts, and individual volunteers participated in the storm-marking program by placing 60 markers on inlet structures throughout the Town. See Appendix A for details.</p>
<p><b>1A.4</b></p>	<p><b><i>Reach out to school-age youth.</i></b>                  In Spring of 2019, the Public Works Senior Engineer for stormwater presented information on Town’s MS4 permit and the stormwater pollution prevention program to 11th and 12th graders in an environmental science class at Tuscarora High School. The lesson and presentation provided students with information about the activities the Town is engaged in to reduce stormwater pollution and how they can be stormwater stewards in their community. This reinforced their understanding of the Town’s pollution prevention efforts and 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. They were also encouraged to volunteer for the storm marking program and water monitoring program. Approximately 15 students from each of the two classes participated in the sessions. The lesson presentation is available upon request.</p>
<p><b>1.B</b></p>	<p><b><u>Bacteria from Pet Waste</u></b></p>
<p><b>1.B1</b></p>	<p><b><i>Promote the PAWS for Clean Water initiative.</i></b>                  On September 9, 2018, the Town’s Parks &amp; Recreation Department hosted “Leesburg Is Going to the Dogs” at the Town’s AV Symington Aquatic Center and the Department of Public Works &amp; Capital Projects participated to encourage responsible pet ownership using a voluntary pledge that owners will pick up after their pets. Approximately 270 dogs with an average of two people per dog participated in the activities. 250 pet waste pickup dispensers, along with informational postcards on pet waste pollution facts were given to the participants. 105 dog owners signed the PAWS pledge. Photos of the dispensers are provided in Appendix A.</p>
<p><b>1.B2</b></p>	<p><b><i>Post social media message on proper pet waste disposal.</i></b>                  The Town posted messages about proper pet waste disposal on social media. The Facebook posts (May 2, 2019 and May 28, 2019) received a combined 103 likes and 20 shares and the Twitter post (May 2, 2019) received eight likes and one retweet. Screenshots documenting these activities are included in Appendix A.</p>
<p><b>1.B3</b></p>	<p><b><i>Include a bacteria-related message in the Town’s postcard to all single family/townhome residents.</i></b>                  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 11,450+ addresses (single-family and townhouse units) inside</p>

<b>MCM #1 Tasks - Public Education and Outreach on Stormwater Impacts</b>	
<b>1.B4</b>	<p>the Town’s corporate limits. A copy of the postcard is enclosed in Appendix A.</p> <p><b><i>Mail information on bacteria pollution prevention strategies to HOAs and property management companies.</i></b></p> <p>The Town mailed information on bacteria pollution prevention strategies to HOAs and property management companies. The mail was sent to 39 HOAs within the Town. A copy of the information is included in Appendix A.</p>
<b>1.C</b>	<p><b><u>Illicit Discharges and Illegal Dumping</u></b></p>
<b>1.C1</b>	<p><b><i>Promote Household Hazardous Waste disposal options in seasonal newsletter.</i></b></p> <p>To promote proper disposal of hazardous waste, the Town continued to work with Loudoun County’s Office of Solid Waste Management to promote HHW collection events sponsored by Loudoun County. The household hazardous waste disposal event is publicized on the Town Trash and Recycling Services website: <a href="https://www.leesburgva.gov/government/departments/public-works/trash-recycling-services/special-item-disposal-recycling/hazardous-household-waste">https://www.leesburgva.gov/government/departments/public-works/trash-recycling-services/special-item-disposal-recycling/hazardous-household-waste</a>. Copies of the screen shots from the town website and county website are included in Appendix A.</p>
<b>1.C2</b>	<p><b><i>Post social media message on proper HHW disposal.</i></b></p> <p>The Town posted messages promoting proper HHW disposal on social media, and specifically a Loudoun County collection event located near the Town. The Facebook post (March 18, 2019) received 12 likes and 15 shares and the Twitter post (March 1, 2019) received one like and two retweets. Copies of the social media post items are included in Appendix A.</p>
<b>1.C3</b>	<p><b><i>Include an illicit discharge-related message in the Town’s postcard to all single family/townhome residents.</i></b></p> <p>This BMP is scheduled for implementation in PY2 and PY4.</p>
<b>1.C4</b>	<p><b><i>Mail information on illicit discharge prevention strategies to HOAs and property management companies.</i></b></p> <p>This BMP is scheduled for implementation in PY2 and PY4.</p>
<b>1.C5</b>	<p><b><i>Mail letter and tip sheet to restaurants on proper storage and disposal of cooking oil and grease.</i></b></p> <p>This BMP is scheduled for implementation in PY2 and PY4.</p>
<b>1.D</b>	<p><b><u>Nutrients</u></b></p>
<b>1.D1</b>	<p><b><i>Promote proper fertilization techniques in seasonal newsletter.</i></b></p> <p>The Town continued to focus on reducing sources of nutrients. During PY1, the Town included information in the quarterly Town-wide newsletter on the proper fertilizer application techniques to be used on lawns. A copy of the newsletter can be found in Appendix A</p>

**MCM #1 Tasks - Public Education and Outreach on Stormwater Impacts**

**1.D2**      *Post social media message on proper fertilization techniques.*  
 The Town posted messages promoting proper fertilization techniques on social media, with a focus on correct application rates and proper timing. The Facebook post (May 29, 2019) received 4 likes and the Twitter post (July 1, 2019) received one like and one retweet. A copy of the social media post can be found in Appendix A.

**1.D3**      *Include a fertilizer-related message in the Town’s postcard to all single family/townhome residents.*  
 This BMP is scheduled for implementation in PY3.

**1.D4**      *Mail information on nutrient reduction strategies to HOAs and property management companies.*  
 This BMP is scheduled for implementation in PY3.

**1.D5**      *Mail letter and tip sheet to landscape companies on nutrient reduction strategies.*  
 This BMP is scheduled for implementation in PY3.

**1.E**      **Clean Water Partners**

*Participate in the NVRC Clean Water Partners program.*  
 The Town continued to participate in NVRC’s Clean Water Partners program. A full overview of 2019 Clean Water Partners campaign is included in Appendix A. The 2019 campaign continued to focus on lawn care (fertilizers), do-it-yourselfers (power washing, auto care, etc.), and dog owners (pet waste). These align with the Town’s three high-priority stormwater issues. The campaign aired on 20-targeted TV networks and five Spanish language networks for a total of 9,416 times (33,591,119 impressions). The campaign also had a digital component, which resulted in 769,300 online impressions.

Each year, Clean Water Partners conducts a survey of 500 residents in Northern Virginia to measure beliefs, attitudes, and behaviors related to water pollution. The survey includes information about Leesburg residents. However, it is statistically more valuable to compare the results of the combined Leesburg/Loudoun area to Northern Virginia as a whole. The survey is valuable for understanding current behaviors and where additional effort may be needed. The following is a summary of survey highlights:

General Education:

- 71% of Leesburg/Loudoun residents correctly stated that stormwater flows to a local stream and not a wastewater treatment facility. This is higher than the regional average of 68%.
- 16% of Leesburg/Loudoun residents reported receiving information about reducing water pollution in the past 12 months. This is less than the regional average of 22%.

Bacteria from Pets:



**MCM #1 Tasks - Public Education and Outreach on Stormwater Impacts**

- 83% of pet owners regionally always clean up after their pets. This figure is slightly up from previous years. This question is not broken out for Leesburg/Loudoun residents.

Illicit Discharges and Illegal Dumping:

- 80% of Leesburg/Loudoun residents successfully recognized a picture of an illicit discharge. This is higher than the regional average of 75%.
- Only 36% of Leesburg/Loudoun residents would “definitely” or “probably” report the illicit discharge. This is slightly less than the regional average of 38%.
- 41% of Leesburg/Loudoun residents were “confident” or “somewhat confident” about where to report an illicit discharge. This is close to the regional average of 42%.

Nutrients from Fertilizers

- 11% of those with lawns test before fertilizing or only fertilize once in the fall (recommended practices). An additional 25% don’t fertilize. This question is not broken out for Leesburg/Loudoun residents.

The results are generally positive with regard to understanding where stormwater goes, being able to identify an illicit discharge, and properly disposing of pet waste. Additional focus appears to be needed with regard to the application of fertilizers and ensuring that residents feel empowered to actually report an illicit discharge.

**MCM #2 – Public Involvement and Participation**

The Town continued to seek broad 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:

<b>MCM #2 Tasks - Public Involvement and Participation</b>	
<b>BMP</b>	<b>Task</b>
<b>2.A</b>	<b><u>Stormwater Webpage</u></b>
<b>2.A1</b>	<p><i>Host a stormwater webpage with the required permit information.</i></p> <p>The Town’s website includes information on all required elements of the MS4 permit stormwater program.</p> <ul style="list-style-type: none"> <li>• <u>Stormwater Web Page:</u> <a href="https://www.leesburgva.gov/government/departments/public-works/water-quality-stormwater-management">https://www.leesburgva.gov/government/departments/public-works/water-quality-stormwater-management</a></li> <li>• <u>MS4 Permit and Coverage Letter:</u> <a href="https://www.leesburgva.gov/home/showdocument?id=31262">https://www.leesburgva.gov/home/showdocument?id=31262</a></li> <li>• <u>Current MS4 Program Plan:</u> <a href="https://www.leesburgva.gov/home/showdocument?id=31331">https://www.leesburgva.gov/home/showdocument?id=31331</a></li> <li>• <u>Most Recent Annual Report:</u> <a href="https://www.leesburgva.gov/home/showdocument?id=30451">https://www.leesburgva.gov/home/showdocument?id=30451</a></li> <li>• <u>Public Comment Form:</u> <a href="https://www.leesburgva.gov/government/departments/public-works/water-quality-stormwater-management/about-stormwater-and-the-stormwater-management-program/public-comment-on-town-ms4-permit-plan">https://www.leesburgva.gov/government/departments/public-works/water-quality-stormwater-management/about-stormwater-and-the-stormwater-management-program/public-comment-on-town-ms4-permit-plan</a></li> <li>• <u>Illicit Discharge Reporting Form:</u> <a href="https://www.leesburgva.gov/government/departments/public-works/water-quality-stormwater-management/illegal-discharge-information-and-reporting">https://www.leesburgva.gov/government/departments/public-works/water-quality-stormwater-management/illegal-discharge-information-and-reporting</a></li> </ul>
<b>2.B</b>	<b><u>Public Reporting of Potential Illicit Discharges</u></b>
<b>2.B1</b>	<p><i>Provide information on how to report a potential illicit discharge on the Town’s webpage.</i></p> <p>The Town maintains 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><a href="https://www.leesburgva.gov/government/departments/public-works/water-quality-stormwater-management/illegal-discharge-information-and-reporting">https://www.leesburgva.gov/government/departments/public-works/water-quality-stormwater-management/illegal-discharge-information-and-reporting</a></p>

**MCM #2 Tasks - Public Involvement and Participation**

**2.B2** *Maintain the “Illegal Discharge Information and Reporting” function on the webpage.*  
 Find below the link to the “Illegal Discharge Information and Reporting” function on the Town’s webpage:  
<https://www.leesburgva.gov/government/departments/public-works/water-quality-stormwater-management/illegal-discharge-information-and-reporting>

**2.B3** *Include erosion and illicit discharges on the Town’s “How Do I Report...” function.*  
 Find below the link to the “How Do I Report...” function on the webpage, which provides the ability to report issues related to:

- Blocked Storm Sewer
- Erosion Problem
- Illegal Discharge into Storm Sewer
- Illicit Discharge into Sanitary Sewer

<https://www.leesburgva.gov/government/departments/public-works/contact-public-works>

**2.C** **Public Input and Complaints**

**2.C1** *Maintain a “Public Input and Complaint” function on the webpage.*  
 Find below link to the “Public Input and Complaint” function on the Town’s webpage:  
<https://www.leesburgva.gov/government/departments/public-works/water-quality-stormwater-management/about-stormwater-and-the-stormwater-management-program/public-comment-on-town-ms4-permit-plan>

**2.C2** *Implement the Public Input and Complaint SOP.*  
 To date there has been no complaint received or input from the public on the MS4 Program Plan or the Town’s overall stormwater pollution prevention efforts. The Public Input and Complaint SOP is included in the MS4 Program Plan.

**2.D** **Public Involvement Opportunities**

**2.D1** *Implement at least four public involvement activities.*  
 The Town implemented the following activities to increase the public’s awareness and participation in the Town’s water quality and pollution prevention efforts:

Description	Time Period	Metric
Town Environmental Advisory Committee (EAC) Rain Barrel Workshops	April 22-23, 2019 and May 14-15, 2019.	The Town EAC partnered with Loudoun County Soil and Water Conservation District to host four rain barrel workshops. 27 rain barrels were purchased at a discount rate of \$25/rain barrel.

**MCM #2 Tasks - Public Involvement and Participation**

Booth at the Flower and Garden Festival	April 27-28, 2019	The Flower and Garden Festival is attended by 28,000 visitors. The Town handed out stormwater pollution prevention literature and yard waste and recycling stickers. Some visitors also took the PAWS for Clean Water Pledge.
Sponsor Keep Leesburg Beautify Trash Clean Ups	April 2019	This Town-sponsored event promotes trash clean-up along streams and waterways. Approximately 2,285 pounds of debris and litter were collected.
Sponsor "Leesburg is Going to the Dogs"	September 9, 2018	The Town's Parks and Recreational Department hosted this annual dog swim event, which is used by Public Works & Capital Projects to promote proper pet waste disposal. Town staff distributed 250 dog waste pick up dispensers along with informational postcards on pet waste pollution facts.
Storm Drain Marking	Various	30 volunteers placed 60 markers on inlet structures throughout the Town.

Copies of event promotional materials are available in Appendix B.

**2.D2** *Continue to include guidelines for promoting volunteer opportunities on the webpage.*  
 The Town's stormwater webpage continues to include information on the process for advertising volunteer opportunities for non-profit organizations. The link is provided below:  
<https://www.leesburgva.gov/government/departments/public-works/water-quality-stormwater-management/non-governmental-volunteer-opportunities>

**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 educating the public on options for proper disposal of hazardous household waste. The Town reviewed and updated its Illicit Discharge Inspection and Elimination (IDDE) Plan in April 2019 to ensure it meets all the specified components outlined in the most recent MS4 permit. A copy of the plan is included in the MS4 Program Plan. Activities this permit year included:

<b>MCM#3 Tasks - Illicit Discharge Detection and Elimination</b>	
<b>BMP</b>	<b>Task</b>
<b>3.A</b>	<b><u>Storm Sewer System Map</u></b>
<b>3.A1</b>	<i>Update outfall table in accordance with Part IE3a of the MS4 permit.</i> The Town updated the stormwater outfall map and tables in accordance with Part IE3a of the MS4 permit. The map was submitted to DEQ in accordance with BMP 3.A2.
<b>3.A2</b>	<i>Submit GIS shape-file to DEQ.</i> The Town provided DEQ the GIS compatible shape file and outfall tables on June 27, 2019.
<b>3.A3</b>	<i>Maintain map and outfall table annually, no later than October 1.</i> The Town maintains the outfall map and outfall table on at least an annual basis. No new outfalls have been added and no new TMDLs have been approved since submittal of the GIS shape file in BMP 3.A2.
<b>3.A4</b>	<i>Identify new interconnections and notify adjacent MS4s as applicable.</i> No new interconnections were identified during PY1.
<b>3.B</b>	<b><u>Authority to Address Illicit Discharges</u></b>  <i>Enforce Town Code prohibitions against illicit discharges.</i> 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 has the necessary authority to prohibit illicit discharges and no changes to the Town Code are proposed at this time.
<b>3.C</b>	<b><u>Written Procedures Addressing Illicit Discharges and Illegal Dumping</u></b>  <i>Implement IDDE plan and incorporate into training.</i> The Town continued to implement its IDDE plan and has incorporated the plan into the Town pollution prevention training program found in BMP 6.E.

**MCM#3 Tasks - Illicit Discharge Detection and Elimination**

**3.D Dry Weather Outfall Reconnaissance**

*Conduct dry weather outfall reconnaissance on 50 outfalls annually.*

Town staff inspected 50 outfalls during PY1. During the inspection process, the Town also identified and implemented basic maintenance on 44 of the outfalls. No indications of illicit discharge were found during the inspection process.

Permit Year	Outfalls to be Inspected		Need Repairs	Completed Maintenance
	MS4 Plan	Completed		
PY1 Total	50	50	44	23

A list of the outfalls inspected, and their status is included in Appendix C.

**3.E Illicit Discharge Tracking**

*Maintain the illicit discharge-tracking database.*

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.

Date Observed	Follow Up Activities	Resolution Measures	Date Closed
Not Applicable	None	None	None

**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:

**MCM#4 Tasks – Construction Site Stormwater Runoff Control**

BMP	Task
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**4.A Maintain Local Program Consistency**

**4.A1 *Implement program consistent with state law and regulations.***

The Town continued to implement a program consistent with state law and regulations. In addition, the Town and Loudoun County continued to implement E&S controls based on a Memorandum of Understanding provided to DEQ during the previous permit cycle. No changes to the program have been made that would affect compliance with state law or regulations.

**4.A2 *Train all plan review, inspection, and enforcement staff in accordance with state law and regulations.***

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; and, one staff member with Dual Inspector certification. Staff members participate in training and recertification as required each year. Copies of the certificates are included in Appendix E.

**4.B Track and report all land disturbing activities.**

***Track and report all land disturbing activities in accordance with permit requirements.***

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. The following information is reported for PY1 in accordance with the MS4 permit:

Confirmation Statement:	All land disturbing activities in the Town have been conducted in accordance with approved standards and specifications.
Explanation for Projects Not Conducted In Accordance with Standards and Specifications:	Not applicable.
Total Number of Land Disturbing Activities	17
Total Land Disturbance:	331 acres.
Number and Type of Enforcement Activities:	One “Notice to Comply.”

A list of all land disturbing activities for which permits were issued during PY1 has been included in Appendix D.

**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. Activities this permit year included:

<b>MCM#5 Tasks – Post-Construction Stormwater Management</b>	
<b>BMP</b>	<b>Task</b>
<b>5.A</b>	<b><u>Post Construction Stormwater Management</u></b>
<b>5.A1</b>	<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 law and regulations. No changes to the program have been made that would affect consistency with the VSMP regulations.</p>
<b>5.A2</b>	<p><i>Train all plan review, inspection, and enforcement staff in accordance with state law and regulations.</i></p> <p>The Town has five staff members who maintain DEQ Stormwater Management certification: one staff member with Plan Reviewer certification; three staff members with Dual Combined Administrator certification; and, one staff member with Dual Inspector certification. Staff members participate in training and recertification as required each year. Copies of the certificates are included in Appendix E</p>
<b>5.B</b>	<b><u>Stormwater Facility Tracking</u></b>
<b>5.B1</b>	<p><i>Update stormwater facility database in accordance with Part IE5 of the MS4 permit.</i></p> <p>In PY1, seven BMPs were added to the inventory (two privately-owned and five publicly-owned). A summary containing required information for BMPs brought online in PY1 is provided in Appendix E</p>
<b>5.B2</b>	<p><i>Update database no later than 30 days after each new facility is brought online.</i></p> <p>New facilities are added to the Town’s BMP database within 30 days after each facility maintenance bond is released.</p>
<b>5.B3</b>	<p><i>Track information on all enforcement activities.</i></p> <p>The Town’s BMP database is updated annually to record inspection and enforcement actions.</p>
<b>5.B4</b>	<p><i>Use the DEQ Construction Stormwater Database to report new facilities requiring a construction general permit.</i></p> <p>The Town continued to use the DEQ Construction Stormwater Database to report new facilities requiring a construction general permit.\</p>



**MCM#5 Tasks – Post-Construction Stormwater Management**

**5.B5**                    *Use the DEQ BMP Warehouse to report all other new facilities no later than October 1.*  
 The Town will use the DEQ BMP Warehouse to report new facilities not requiring a construction general permit. All new facilities brought on-line in PY1 were required to have a construction general permit and were therefore reported using the DEQ Construction Stormwater Database in BMP 5.B4.

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

**5.C1**                    *Enforce provisions that require BMP maintenance agreements and easements.*  
 The Town continues to require maintenance agreements as a condition for construction drawings approval in accordance with the Town’s stormwater management ordinance.

**5.C2**                    *Require private BMP owners to provide maintenance letters annually. Initiate appropriate enforcement action as necessary.*  
 The Town currently has 43 owners with privately-owned BMPs and annually provides a notice to the owners about their maintenance and reporting requirements. During PY1, thirty four owners of privately owned BMPs returned their certification reports and nine are still delinquent. The Town will be following up with delinquent owners to make sure that they provide their yearly BMP certifications. The Town will utilize enforcement measures for compliance as necessary.

**5.C3**                    *Conduct inspection of all privately owned facilities once every five years.*  
 The Town conducts inspections of all privately owned facilities at least once every five years. At the beginning of the current permit year, the Town had 285 privately owned stormwater management facilities. Thirty-two Stormwater Management Facilities were inspected during this period. The following shows progress toward inspecting these facilities during the permit cycle:

PY1	PY2	PY3	PY4	PY5	Cumulative % Inspected
32					11.23%

Of the facilities inspected in PY1, twenty-three were in need of follow up and repairs. Letters were sent to the owners of these facilities requiring the owner to respond with an action plan within 30 days. A copy of the inspection spreadsheet is included in Appendix E.

**5.C4**                    *Conduct inspection of publicly maintained BMPs per the “alternative schedule.”*

**MCM#5 Tasks – Post-Construction Stormwater Management**

The Town conducts inspections of all publicly owned facilities on the alternative schedule in the MS4 Program Plan. Dry ponds, wet ponds, and vegetated swales are inspected once every two years. All other facilities are inspected annually. The following shows progress toward meeting this inspection cycle:

Facility Type	# of Facilities	# Inspected	# Requiring Follow Up
Dry Ponds, Wet Ponds, and Vegetated Swales	13	PY1	28
		13	
All Other Facilities	21	21	

All facilities in need of repair or maintenance work have been forwarded to the Street Maintenance Division for action. A copy of the inspection spreadsheet is included in Appendix E.

No significant maintenance, repair, or retrofit activities were performed on public facilities in PY1.

**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. Activities this permit year included:

<b>MCM#6 Tasks – Pollution Prevention and Good Housekeeping for Municipal Operations</b>	
<b>BMP</b>	<b>Task</b>
<b>6.A</b>	<b><u>Operation and Maintenance Pollution Prevention SOPs</u></b>
<b>6.A1</b>	<i>Implement SOP for Stormwater Pollution Prevention.</i> The SOP has been distributed to all relevant agencies and is being actively implemented.
<b>6.A2</b>	<i>Prohibit application of deicing agents containing urea or other forms of nitrogen or phosphorus.</i> The SOP has been updated to prohibit the application of deicing agents containing urea or other forms of nutrients and is being implemented accordingly.
<b>6.A3</b>	<i>Annually review SOP.</i> The SOP has been reviewed and there are no changes required at this time.
<b>6.A4</b>	<i>Incorporate SOP into staff training.</i> Applicable parts of the SOP were integrated into the IDDE training conducted in accordance with BMP 6.E.
<b>6.B</b>	<b><u>Stormwater Pollution Prevention Plans for High-Priority Facilities</u></b>
<b>6.B1</b>	<i>Implement stormwater industrial SWPPPs under VPDES permits.</i> 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 upon request.
<b>6.B2</b>	<i>Update WPCF/CMF SWPPP to cover Utilities Maintenance Facility.</i> The WPCF/CMF SWPPP will be updated to cover the Utilities Maintenance Facility after the new industrial permit is issued to the WPCF/CMF. The registration statement for the WPCF/CMF was submitted in May 2019, and the Town will update the SWPPP once the new permit is formally issued by DEQ.

<b>MCM#6 Tasks – Pollution Prevention and Good Housekeeping for Municipal Operations</b>	
<b>6.B3</b>	<p><b><i>Review high-priority sites and develop new SWPPPs, if necessary.</i></b>                      The Town reviewed high priority sites and found that no new SWPPPs or other actions are necessary.</p>
<b>6.B4</b>	<p><b><i>Review high-priority sites after incidents and update SWPPPs, if necessary.</i></b>                      There were no high-priority sites with any illicit discharge incidents and therefore no updates to SWPPPs were necessary.</p>
<b>6.C</b>	<p><b><u>Turf and Landscape Nutrient Management Plans (NMPs)</u></b></p>
<b>6.C1</b>	<p><b><i>Implement NMPs.</i></b>                      The Town Department of Parks and Recreation continues to implement NMPs for Freedom, Robinson, and Ida Lee parks. Updated NMPs will be provided to DEQ in accordance with BMPs 6.C2 and 6.C3.</p>
<b>6.C2</b>	<p><b><u>Update Freedom Park and Robinson Park NMPs.</u></b>                      This BMP is scheduled for implementation in PY2.</p>
<b>6.C3</b>	<p><b><u>Update Ida Lee Park NMP.</u></b>                      This BMP is scheduled for implementation in PY3.</p>
<b>6.D</b>	<p><b><u>Contractor Oversight Procedures</u></b></p>
<b>6.D1</b>	<p><b><i>Implement contractor RFP/contract requirements.</i></b>                      The RFP/contract requirements continue to be implemented through the specifications of bidding documents and general conditions and specifications incorporated into contract documents.</p>
<b>6.E</b>	<p><b><u>Training Plan.</u></b></p>
<b>6.E1</b>	<p><b><i>Provide biennial training for field personnel on recognition and reporting of illicit discharges.</i></b>                      A web-based training on recognizing and reporting potential illicit discharge was provided to all appropriate staff via the Town’s TOLNET (Town of Leesburg Net). 102 employees participated in the TOLNET training. A copy of the employees list of participants and a screen shot of the training video are included in Appendix F.</p>
<b>6.E2</b>	<p><b><i>Provide biennial pollution prevention training to road, street, and parking lot maintenance personnel.</i></b>                      This BMP is scheduled for implementation in PY2 and PY4.</p>
<b>6.E3</b>	<p><b><i>Provide biennial pollution prevention training to maintenance, public works, and recreational facility personnel.</i></b></p>

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

This BMP is scheduled for implementation in PY2 and PY4.

**6.E4**

***Provide appropriate certification for personnel engaged in pesticide and herbicide application.***

The Department of Parks and Recreation coordinates with the Department of Public Works and Capital Projects to ensure all employees who apply pesticides or herbicides are properly trained in safe application procedures and maintain all required certifications. Copies of the most recent certificates are included in Appendix F.

**6.E5**

***Provide appropriate certification for personnel engaged in implementation of VESC and VSMP requirements.***

The Town has seven staff members who maintain DEQ Stormwater Management certification: two staff members with VESC Inspectors certification; one staff member with Plan Reviewer certification; three staff members with Dual Combined Administrator certification; and, one staff member with Dual Inspector certification. Staff members participate in training and recertification as required each year. Copies of the certificates are included in Appendix E

**6.E6**

***Provide refresher training to emergency spill response personnel.***

This BMP is scheduled for implementation in PY5.

## **5. MS4 Program Plan Assessment**

The MS4 Program Plan was updated in April 2019 to address the requirements of the current MS4 permit. DPWCP continues to be responsible for overall stormwater planning, operations, and the administration of the Town's MS4 permit. In accordance with the MS4 permit, the Town has evaluated the MS4 Program Plan, including a review of each MCM. The Town finds that the BMPs established to implement the MCMs are effective and that no changes are required at this time.

***B. Chesapeake Bay TMDL Action Plan Status Report***

In accordance with the MS4 permit, the Town has developed a Draft Phase II Chesapeake Bay TMDL Action Plan. The action plan documents the 5% reduction from the first permit cycle, establishes the 40% reduction target, and identifies the BMPs to be implemented during the second permit cycle. The following provides annual reporting information required in Part II A 13 of the MS4 permit.

List of BMPs Implemented But Not Reported to DEQ BMP Warehouse (Part II A 13 a)

No structural BMPs were implemented during this reporting period that were not otherwise reported to the DEQ BMP Warehouse in accordance with Part I E 5 g of the MS4 permit.

Acquired Credits (Part II A 13 b)

The Town did not acquire credits during this reporting period to meet any portion of the required reductions.

Progress Toward Meeting 40% Reduction Requirement ((Part II A 13 c)

The following table summarizes progress made by the Town to implement the Phase II Chesapeake Bay TMDL Action Plan. Calculations for any new BMPs implemented during this reporting period are contained in Appendix G.

BMPs	Status Narrative	Phase II Bay TMDL Action Plan Planned and Implemented BMPs			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 Phase II Chesapeake Bay TMDL Action Plan documents 18 redevelopment projects from the first permit cycle. No additional redevelopment projects have been completed in the second permit cycle.	132.79	32.62	13,659.38	132.79	32.62	13,659.38

BMPs	Status Narrative	Phase II Bay TMDL Action Plan Planned and Implemented BMPs			Total Reductions Achieved To-Date		
		TN (lbs/yr)	TP (lbs/yr)	TSS (lbs/yr)	TN (lbs/yr)	TP (lbs/yr)	TSS (lbs/yr)
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 Phase II 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
Town-Initiated Projects	The Phase II Chesapeake Bay TMDL Action Plan includes three retrofit projects and one stream restoration. The three retrofit projects (Foxridge, Greenway, and Stratford) were completed during the first permit cycle and documented in the FY18 annual report. The Tuscarora Creek stream restoration will be completed in late FY20 or early FY21.	2,050.12	550.96	250,002.94	1,257.06	105.46	123,557.24
Street Sweeping	The Town continues to take credit for its street sweeping program. However, reductions are now calculated using the Expert Panel methodology. The Town has 109 centerline miles (218 curb miles) of road that are swept using a vacuum assisted sweeper an average of 7-8 times per year. This enables the	23.65	8.41	11,336.00	23.65	8.41	11,336.00



BMPs	Status Narrative	Phase II Bay TMDL Action Plan Planned and Implemented BMPs			Total Reductions Achieved To-Date		
		TN (lbs/yr)	TP (lbs/yr)	TSS (lbs/yr)	TN (lbs/yr)	TP (lbs/yr)	TSS (lbs/yr)
	Town to take credit in accordance with practice SPC-5 from the Expert Panel. The calculation is included in Appendix G.						
More Stringent Regulation of Land Disturbing Activities	The Phase II Chesapeake Bay TMDL Action Plan documents one project that resulted in a reduction as a result of the Town's more stringent regulation of land disturbing activities. No additional projects have been completed in the second permit cycle.	2.01	0.15	0.00	2.01	0.15	0.00
Additional BMPs	The Phase II Chesapeake Bay TMDL Action Plan states that the Town reserves the right to take additional credit for other BMPs allowed in DEQ's Chesapeake Bay TMDL Special Condition Guidance. No additional BMPs have been implemented to-date.	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total*</b>		<b>2,396.44</b>	<b>660.87</b>	<b>304,956.77</b>	<b>1,603.38</b>	<b>215.36</b>	<b>178,511.06</b>

*\*Totals may not add up to the exact sum of BMPs due to rounding.*

<b>Pollutant</b>	<b>40% Reduction Requirement from Permit</b>	<b>Planned and Implemented BMPs from Phase II Action Plan</b>	<b>Reductions Achieved To-Date</b>	<b>Remaining Reduction Required to Meet 40%</b>
Total Nitrogen	1,913.01	2,396.44	1,603.38	309.63
Total Phosphorus	222.47	660.87	215.36	7.11
Total Suspended Sediment	184,772.28	304,956.77	178,511.06	6,261.22

List of BMPs Planned for Next Reporting Period

The Town expects that the following projects will be implemented during the FY20 or FY21 reporting period:

- Tuscarora Creek Stream Restoration

**C. 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.

		<b>Planned Reductions from Benthic TMDL Action Plan for Goose Creek</b>	<b>Total Reductions Achieved To-Date</b>
<b>Means and Methods</b>	<b>Status Narrative</b>	<b>TSS (lbs/yr)</b>	<b>TSS (lbs/yr)</b>
Redevelopment	All redevelopment projects from the Phase II Chesapeake Bay TMDL Action Plan, with the exception of one, are in the Goose Creek watershed.	8,180	13,383.67
Town-Initiated Projects	All Town-initiated projects from the Phase II Chesapeake Bay TMDL Action Plan are within the Goose Creek watershed. See the Phase II Chesapeake Bay TMDL Action Plan status report above for details.	246,230	123,557.24
Street Sweeping	The Town calculated that approximately 93% of the impervious area of the Town is within the Goose Creek watershed. As a result, 93% of the TSS reduction from the Phase II Chesapeake Bay TMDL Action Plan is assumed attributable to the Goose Creek watershed. As noted in the Phase II Chesapeake Bay TMDL Action Plan status report, the methodology has changed for crediting street sweeping operations.	126,945	10,542.48
<b>Total</b>		<b>381,355</b>	<b>147,483.39</b>

<b>Pollutant</b>	<b>Existing Load from Goose Creek Portion of the MS4</b>	<b>Planned Reductions from Approved Action Plan</b>	<b>Reductions Achieved</b>
Total Suspended Sediment	2,644,048	381,355	147,483.39

***D. Appendix***

**Appendix A - MCM#1**

**Appendix B - MCM#2**

**Appendix C - MCM#3**

**Appendix D - MCM#4**



**Appendix E - MCM#5**

**Appendix F - MCM#6**

**Appendix G – TMDL Action Plan Documentation**