# Stormwater Pollution Prevention Plan

George Washington Memorial Parkway Maintenance Complex

2700 George Washington Memorial Parkway Arlington, VA 22202 Date: September 2014

Revised May 2018

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# 2. Certification

This plan was designed to assure that site operations at the George Washington Memorial Parkway Maintenance Complex are conducted in accordance with District of Columbia stormwater requirements and best management practices. Based on my knowledge of the site and the people responsible for implementing the plan, the information within this document is accurate. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:	
Printed Name:	Charles Cuvelier
Date:	July 19, 2022
Job Title:	Superintendent
Telephone Number:	703-289-2511

Note - This must be signed by a senior executive officer having responsibility for the overall operations of the facility described in this document.

# 3. Crosswalk

The table below lists the elements required under the 2014 Virginia Pollutant Discharge Elimination System (VPDES) Permit for Discharges of Stormwater Associated with Industrial Activity (VAR05), and the specific sections of this document that meet those requirements.

VAR05 R	equirements	Associated GWMP SWP3 Sections
Pollution prevention team	9 VAC 25-151-80(B)(1)	Stormwater Pollution Prevention
		<u>Team</u>
Site description	9 VAC 25-151-80(B)(2)	Physical Site Information
Industrial	9 VAC 25-151-80(B)(2)(a) activities	7.2 Industrial Activity and
		Associated Pollutants
General location map	9 VAC 25-151-80(B)(2)(b)	6.3 General Location and Site Maps
Site map	9 VAC 25-151-80(B)(2)(c)	6.3 General Location and Site Maps
Receiving waters and wetlands	9 VAC 25-151-80(B)(2)(d)	Figure 3: GWMP Maintenance
		Complex Layout
Potential pollutant sources	9 VAC 25-151-80(B)(3)	7.2 Industrial Activity and
		Associated Pollutants
List of industrial activities	9 VAC 25-151-80(B)(3)(a)	7.2 Industrial Activity and
		Associated Pollutants
List of pollutants	9 VAC 25-151-80(B)(3)(b)	7.2 Industrial Activity and
		Associated Pollutants
Spills and leaks	9 VAC 25-151-80(B)(3)(c)	8.2 Spill History
Sampling data	9 VAC 25-151-80(B)(3)(d)	10.7 Sampling Data
Stormwater controls	9 VAC 25-151-80(B)(4)	Stormwater Control Measures
Good housekeeping	9 VAC 25-151-80(B)(4)(b)(1)	9.2 Good Housekeeping Practices
Eliminating and minimizing	9 VAC 25-151-80(B)(4)(b)(2)	9.1 Minimize Exposure
exposure		
Preventive maintenance	9 VAC 25-151-80(B)(4)(b)(3)	9.3 Maintenance
Spill prevention procedures	9 VAC 25-151-80(B)(4)(b)(4)(a)	9.4 Spill Prevention and Response
		Procedures
Spill response procedures	9 VAC 25-151-80(B)(4)(b)(4)(b)	9.4 Spill Prevention and Response
		Procedures; 8.3 Spill Reporting
Labeling procedures	9 VAC 25-151-80(B)(4)(b)(4)(c)	9.2 Good Housekeeping Practices
Spill response contacts	9 VAC 25-151-80(B)(4)(b)(4)(d)	8.3 Spill Reporting
Salt storage piles	9 VAC 25-151-80(B)(4)(b)(5)	9.7 Salt and Sand Storage Piles
Employee training	9 VAC 25-151-80(B)(4)(b)(6)	<u>9.9 Employee Training</u>
Sediment and erosion control	9 VAC 25-151-80(B)(4)(b)(7)	9.5 Erosion and Sediment Controls
Management of runoff	9 VAC 25-151-80(B)(4)(b)(8)	9.6 Management of Runoff
Dust suppression and vehicle	9 VAC 25-151-80(B)(4)(b)(9)	9.12 Dust Generation and Vehicle
tracking of industrial materials		Tracking of Industrial Materials
Routine facility inspections	9 VAC 25-151-80(B)(5)	<u>10.3 Quarterly Facility Inspection;</u>
		10.4 Quarterly Visual Monitoring
Maintenance	9 VAC 25-151-80(C)	<u>9.3 Maintenance</u>
Nonstormwater discharges	9 VAC 25-151-80(D)	7.3 Non-stormwater Discharges
Comprehensive site compliance	9 VAC 25-151-80(E)	10.5 Annual Site Compliance
evaluation		Evaluation
Signature and location	9 VAC 25-151-80(F)(1)	Certification
Availability	9 VAC 25-151-80(F)(2)	SWP3 Maintenance
Required modifications	9 VAC 25-151-80(F)(3)	SWP3 Maintenance
Updating	9 VAC 25-151-80(G)	SWP3 Maintenance

# 4. Overview

#### 4.1 General Facility Information

-	
Permit Number:	VAR051790
GWMP Maintenance	National Park Service
Complex Address:	George Washington Memorial Parkway
	Maintenance Complex
	2700 George Washington Memorial Parkway
	Arlington, VA 22202
GWMP Headquarters	National Park Service
Address:	George Washington Memorial Parkway
	Turkey Run Park
	McLean, VA 22101
GWMP SIC Code:	9512
GWMP Maintenance	4111-4173
Complex SIC Code:	
Industrial Activity:	Land Transportation and Warehousing
Coordinates:	38°50'52.78"N
	77° 2'57.30"W
Property Size:	9.4 acres
Receiving Water Body:	Potomac River
County:	Arlington
Facility Owner:	National Park Service
Facility Operator:	National Park Service
SWP3 Contact:	Curtis Rintz

#### 4.2 Introduction

George Washington Memorial Parkway (GWMP) is a unit of the National Park Service (NPS) with sites in Virginia, Maryland, and Washington, DC. GWMP is mainly a recreational, scenic driving route from Langley, Virginia, through Washington, DC, and to Mount Vernon, Virginia, but also includes amenities and structures such as roads, hiking and bicycling trails, picnic areas, several historic buildings, and the GWMP Maintenance Complex. The GWMP Maintenance Complex ("facility") is the base of maintenance operations for GWMP and supports activities related to park and road maintenance and grounds services for the entire Park. The GWMP Maintenance Complex is located in Arlington, Virginia, just west of Ronald Reagan National Airport.

The primary function of GWMP is to regulate, supervise, and control land use, which are activities that do not trigger storm water permitting requirements. However, some isolated activities take place within the park that could be characterized as industrial activities and may pose a risk to storm water. Therefore, the park is acting in the spirit of the Clean Water Act to ensure park activities do not adversely affect the environment. Some activities taking place at the GWMP Maintenance Complex are industrial in nature. The GWMP Maintenance Complex has thus been identified as a site that should comply with permitting requirements under the 2014 General Virginia Pollutant Discharge Elimination System (VPDES) Permit for Discharges of Stormwater Associated with Industrial Activity (VAR05). Industrial activities at this site include fuel dispensing, hazardous materials storage and handling, lead acid battery storage and handling, vehicle and large equipment storage, vehicle maintenance, and salt and sand storage and loading. Site activities and operations mostly take place under cover, however some activities taking place in outside areas have the potential to impact stormwater quality.

This storm water pollution prevention plan (SWP3) describes best management practices (BMP)—which include a schedule of activities, prohibitions of practices, maintenance procedures, and other management practices—to support the goal of preventing and reducing stormwater contamination from the site. The contents of this plan have been aligned with the VPDES VAR05 (<u>Appendix G</u>).

# 4.3 Objectives

The purpose of this plan is to reduce contamination to stormwater runoff. The objectives of this document are to:

- 1. Identify potential sources of pollution at the GWMP Maintenance Complex;
- 2. List BMPs that will be implemented at the GWMP Maintenance Complex; and
- 3. Provide elements that will help the GWMP Maintenance Complex comply with the terms and conditions of the VPDES VAR05.

# 5. Stormwater Pollution Prevention Team

The SWP3 Team Leader is responsible for ensuring that all stormwater requirements, including requirements of this SWP3, are met. A GWMP SWP3 Team has been established to assist the SWP3 Team Leader in developing, implementing, maintaining, revising, and ensuring compliance with the facility's SWP3.

The SWP3 Team roster is in Appendix A.

The SWP3 Team is responsible for:

- The implementation of all VPDES VAR05 and SWP3 plan requirements;
- Conducting the comprehensive site compliance evaluation, routine facility inspection, and quarterly visual inspection;
- Identifying and addressing potential pollution sources as they develop;
- Overseeing implementation of BMPs;
- Implementing employee training;
- Preparing and submitting any reports as requested by the Virginia Department of Environmental Quality (DEQ) or U.S. Environmental Protection Agency (EPA);
- Identifying and correcting any deficiencies in the SWP3;
- Ensuring updates to the SWP3 (such as changes in facility operation and employees) are made within required timeframes (see Section 10.5); and
- Submitting requests through the Project Management Information System (PMIS) for capital improvements associated with stormwater each year.

# 6. Physical Site Information

#### 6.1 GWMP Maintenance Complex Activities

The GWMP Maintenance Complex consists of the following operations:

- Office space;
- Underground fuel storage tanks and fueling stations;
- Vehicle and equipment maintenance areas;
- Vehicle and equipment storage;
- Vehicle washing; and
- Salt storage.

#### 6.2 Structures

Physical structures at GWMP Maintenance Complex include:

- Parking spaces;
- Office buildings;
- Storage bays maintained by the White House;
- Covered salt and sand storage;
- Underground gasoline and diesel tanks with aboveground fuel dispensers;
- Covered vehicle and equipment repair building;
- Horticultural shop;
- Buildings and utilities shop;
- Roads and trails shop; and
- Grounds shop.

#### 6.3 General Location and Site Maps

GWMP is a driving route from Langley, Virginia, through Washington, DC, and to Mount Vernon, Virginia. The GWMP Maintenance Complex is in Arlington, Virginia, just west of Ronald Reagan National Airport. The GWMP Maintenance Complex is bordered to the west by a railroad and then by dense urban development; to the east by the GWMP, then the Ronald Reagan National Airport, then the Potomac River; to the south by the convergence of the railroad and GWMP and then by dense urban development; and to the north State Road 233, Airport Access Road and then by dense urban development. The GWMP Maintenance Complex is approximately 9.4 acres. The Potomac River is approximately .9 miles from the eastern border of the facility.

Information about stormwater flows is available in <u>7.1 Site Overview</u>. The diagrams below identify general site features, buildings and structures, drainage patterns, and storm drain locations.



Figure 1: Topographic Map of GWMP Maintenance Complex



Figure 2: Ariel Photograph of GWMP Maintenance Complex



### Figure 3: GWMP Maintenance Complex Layout

Legend:			
Storm drain		+	Potential stormwater pollutant
Stormwater clean	out	$\otimes$	Hazardous waste storage
Sewer lift station			Aboveground storage tank
Stormwater flow			Underground storage tank and fuel station
Stormwater outfal	I		Oil-water separator
Grate drain			Salt Brine Tank
Underground store	n drain pipe		Salt Brine Mixer
Underground sewe	er pipe	Т	Trash dumpster
Driveway/parking	lot	R	Recycling dumpster
Concrete curb		*	Tree
Creek			Grass
C/D Construction and I	Demolition Dumpster	S	Scrap Metal

# 7. Potential Sources of Stormwater Pollution

### 7.1 Site Overview

The GWMP Maintenance Complex is in Arlington, Virginia, just west of Ronald Reagan National Airport. The environment surrounding the GWMP Maintenance Complex is urbanized and the water bodies have been degraded due to urban development and activity. The facility is approximately 9.4 acres in size. The facility is mostly rectangular, with the southern end tapering to a point due to the convergence of an adjacent railroad and the GWMP. The facility is approximately 805 feet long and 300 feet wide. The site is almost entirely flat, with small slopes only to direct stormwater to drains. Most of the area is paved with non-permeable asphalt and concrete. The area surrounding the GWMP Maintenance Complex is comprised of natural vegetation including grasses, vines, shrubs, and trees.

Stormwater from the property flows as a sheet across the surface to one of multiple storm drains located throughout the facility. An underground pipe conveys the stormwater to outfall number 001 at the southernmost end of the facility. Outfall number 001 discharges at the southernmost part of the facility to an unnamed creek that flows east along the south end of the facility. The area directly beyond the fence at the southernmost part of the facility slopes steeply down into the unnamed creek, which flows to Four Mile Run Creek approximately 1,350 feet southeast. Four Mile Run Creek flows to the Potomac River Basin, approximately .9 miles east.

Park employees conduct winter vehicle washing offsite, so there is no runoff from vehicle rinsing activities. Oil separated by the oil-water separator is captured in the tank and cleaned out on an as needed basis. Spill cleanup materials are readily available in the fueling area. Park staff is trained to use the materials to clean up incidental spills of fuel and vehicle fluids.

### 7.2 Industrial Activity and Associated Pollutants

The following list describes the activities and pollutants most likely to impact stormwater quality at GWMP Maintenance Complex.

Industrial Activity	Associate Pollutants
Vehicle and equipment storage	Oil, antifreeze, grease, and fuel
Equipment Fueling	Gasoline and diesel
Salt and sand loading and storage	Sodium Chloride
Hazardous material storage and use	Cleansers, paints, solvents, gasoline oil, pesticides, and toxic materials from lead acid batteries
Vehicle washing	Cleansers, oil, antifreeze, grease, and fuel

Two covered fueling stations dispense gasoline and diesel fuel to vehicles and other equipment. Staff use the stations for fueling NPS vehicles and equipment. The fueling stations are supplied from two underground storage tanks: a 20,000-gallon diesel tank and a 20,000-gallon gasoline tank. Both tanks are constructed of fiberglass reinforced plastic, are double walled, use pressurized piping, and are equipped with automatic tank gauges, breakaway devices, and emergency shut-off devices. Spill cleanup materials are readily available in the fueling area. Park staff is trained to use the materials to clean up incidental spills of fuel and vehicle fluids.

A salt storage barn on the south end of the facility contains a pile of salt used for winter roadway deicing. The storage structure is covered, has three walls, and is open along the northern side. The salt pile is limited in size so that it fits under the roof. Staff minimize exposure of this salt to stormwater by sweeping spillage back onto the pile and under the roof after transfers. The park has also added a salt-brine making station adjacent from the salt storage area on the south end of the facility. Rock salt from the storage shed is transferred to the salt-brine area with a front loader when needed. This transfer is made approximately once per week in the winter months. Park staff monitor the area and clean-up any spills from the transfer of salt to the brine machine each time a transfer is made. When ready for use, the brine is transferred by hose from the brine mixer into the spray trucks.

Vehicles are parked and durable goods are stored on the paved portions of the facility. Vehicles are washed offsite at commercial car washes.

Equipment and vehicle maintenance are performed inside buildings. Used oil generated from maintenance is stored within the vehicle maintenance buildings on secondary containment. Hazardous materials such as solvents, paints, and lead acid batteries are stored onsite inside the maintenance shops. No hazardous materials are stored outside. GWMP also purchased a new watertight hazardous waste storage shed with internal secondary containment, which is located next to the Auto Shop beside the Used Oil AST.

#### 7.3 Non-stormwater Discharges

No activities result in unauthorized non-stormwater discharges under the VPDES VAR05. Authorized nonstormwater discharges that may occur onsite include:

- Discharges from firefighting activities;
- Fire hydrant flushings;
- Potable water including water line flushings;
- Uncontaminated air conditioning or compressor condensate (excluding air compressors);
- Irrigation drainage;
- Landscape watering provided all pesticides, herbicides, and fertilizer have been applied in accordance with manufacturer's instructions;
- Pavement wash waters where no detergents are used and no spills or leaks of toxic or hazardous materials have occurred (unless all spilled material has been removed);
- Routine external building wash down that does not use detergents;
- Uncontaminated ground water or spring water;
- Foundation or footing drains where flows are not contaminated with process materials; and
- Incidental windblown mist from cooling towers.

# 8. Past Spills and Spill Reporting

## 8.1 Areas of Site Where Potential Spills/Leaks Could Occur

The following list describes the areas of the property where potential spills and leaks could occur, and which outfalls are likely to be affected by such spills and leaks.

Industrial Activity	Outfalls
Vehicle and equipment storage	Storm drains, outfall 001, unnamed creek, Four Mile
	Run Creek, Potomac River
Equipment fueling	Storm drains, outfall 001, unnamed creek, Four Mile
	Run Creek, Potomac River
Salt and sand loading and storage	Storm drains, outfall 001, unnamed creek, Four Mile
	Run Creek, Potomac River
Salt brine production	Storm drains, outfall 001, unnamed creek, Four Mile
	Run Creek, Potomac River
Transfer of salt bring to spray trucks	Storm drains, outfall 001, unnamed creek, Four Mile
	Run Creek, Potomac River
Hazardous material storage and use, including	Storm drains, outfall 001, unnamed creek, Four Mile
pesticides and lead acid batteries	Run Creek, Potomac River
Parking	Storm drains, outfall 001, unnamed creek, Four Mile
	Run Creek, Potomac River

### 8.2 Spill History

A spill or leak that requires reporting to the DEQ or the National Response Center (NRC) has not occurred at GWMP Maintenance Complex in more than three years.

# 8.3 Spill Reporting

If there is a release of hazardous materials such as fuel or oil into the environment, under the VPDES VAR05 and in accordance with this SWP3, the Facility Manager will:

- a. Notify the National Response Center at (800) 424-8802 in accordance with the requirements of 40 CFR 117 and 40 CFR 302 respectively, as soon as there is knowledge of the discharge.
- b. To report a hazardous spill in the DC metropolitan area, call the Emergency Management Agency (EMA) at (202) 727-6161.
- During normal work hours, notify the Virginia Pollution Response Program, Northern Regional Office at (703) 583-3800. Nights, holidays, and weekends, notify the Virginia Department of Emergency Management at (800) 468-8892.
- d. Follow the NPS National Capital Region Emergency Response Handbook directions, which include contacting all the following in the event of a non-emergency spill:
  - US Park Police (USPP) Communications Center at 202-619-7300
  - Local fire department at 911
- e. Submit a Pollution Reporting Form to the DEQ, available at <a href="http://www.deq.virginia.gov/Programs/PollutionResponsePreparedness/PollutionReportingForm.aspx">http://www.deq.virginia.gov/Programs/PollutionResponsePreparedness/PollutionRes
- f. Within 30 calendar days after the spill, leak, unauthorized discharge, or other release has occurred, management must review and revise this SWP3 as necessary to prevent a future spill from recurring. Be sure to review and update other plans as necessary and applicable.

# 9. Stormwater Control Measures

In accordance with the VPDES VAR05, this SWP3 stipulates several stormwater control measures, including Best Management Practices (BMP) and preventative maintenance measures that have been implemented at GWMP Maintenance Complex to prevent contaminants from contacting stormwater.

#### 9.1 Minimize Exposure

GWMP Maintenance Complex staff will conduct the following actions to minimize stormwater exposure to contaminants.

- Storing hazardous materials under cover, including oil, gasoline, diesel, pesticides, and lead acid batteries.
- Providing secondary containment for storage of hazardous materials.
- Cleaning up spills and leaks promptly using dry methods (e.g., absorbents).
- Using drip pans and absorbents under or around leaky vehicles and equipment.
- Using spill/overflow protection equipment.
- Conducting all vehicle and equipment washing offsite at a commercial car wash.

#### 9.2 Good Housekeeping Practices

Consistent and proactive housekeeping is required to minimize contaminants from entering stormwater. GWMP Maintenance Complex staff will take the following actions to minimize stormwater exposure to contaminants.

- Plainly labeling containers (e.g., "used oil," "spent solvents," "fertilizers and pesticides," etc.) that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur.
- Regularly sweeping salt and sand into the covered structure after transfers to the storage shed and to the brin making area.
- Purchasing salt and sand in quantities that are small enough to fit within the covered storage structure.
- Regularly sweeping all areas. Sweeping indoor dirt and debris into piles and disposing of those piles in the trash. Not sweeping indoor dirt and debris out the door.
- Maintaining all materials in an orderly fashion with labels intact.
- Storing all materials in appropriate containers.
- Covering bulky equipment scheduled for disposal with waterproof tarps.
- Placing trash and recyclables in appropriate containers and keeping outdoor containers closed at all times.
- Maintaining drain grates at the fueling station free of debris to ensure no stormwater flows over the grate bypassing the oil-water separator.
- Maintaining weather stripping at the base of garage doors so water does not flow into garages during storm events.

#### 9.3 Maintenance

GWMP Maintenance Complex staff will conduct the following maintenance actions to minimize stormwater exposure to contaminants.

- Providing vehicles stored outside with routine preventative maintenance to keep them in good working order.
- Identifying and addressing all leaks during oil changes, maintenance, or when otherwise observed.
- Regularly inspecting, testing, maintaining, and repairing stored industrial equipment to avoid leaks, spills, and other releases.
- Storing hazardous materials not outside exposed to the elements including oil, gasoline, diesel, pesticides, and lead acid batteries.
- Cleaning sediment from storm grates as needed to reduce the amount of sediment discharged.
- Maintaining all equipment necessary for control measures in effective operating condition and making necessary repairs as expeditiously as practicable.

### 9.4 Spill Prevention and Response Procedures

GWMP Maintenance Complex staff follow an Emergency Action Plan (EAP) for responding to spills of hazardous materials. The EAP contains procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases.

Staff will be trained on the EAP when hired or when the plan changes, in accordance with Occupational Safety and Health Administration requirements. The training will include instruction on the types and volumes of materials staff may attempt to clean-up without additional support. The training will also include procedures for getting help in an emergency.

GWMP Maintenance Complex staff will conduct the following spill prevention and response actions to minimize stormwater exposure to contaminants.

- Maintaining spill clean-up materials such as absorbent pads near the fuel dispensing area.
- When refilling portable containers, placing containers first in a compatible plastic tub so spills are contained in the tub rather than spilled out onto the ground.
- Placing plastic tubs with oil-absorbent pads underneath outside vehicles and equipment that are unused for
  extended periods of time. Checking the condition of the plastic tubs and oil-absorbent pads on a regular basis.
  If vehicle and equipment fluids collect in tubs, disposing of them appropriately; also disposing of used oilabsorbent pads appropriately. If appropriate, draining oil, antifreeze, and fuel from unused vehicles and
  equipment to prevent leaks.
- When maintaining equipment and vehicles, fixing all fluid leaks and wiping off fluid drips.
- Maintaining barriers between material storage and traffic areas.

#### 9.5 Erosion and Sediment Controls

There is no evidence of erosion around the property. At this time no additional BMPs are suggested for reducing sediment and erosion at this site.

#### 9.6 Management of Runoff

GWMP Maintenance Complex staff will conduct the following actions to minimize stormwater runoff.

• Maintaining drain grates free of debris.

#### 9.7 Salt and Sand Storage Piles

GWMP Maintenance Complex staff will conduct the following actions to minimize stormwater exposure to salt and sand storage piles.

- Enclosing and covering salt and sand storage piles. The salt and sand storage structure is covered, has three walls, and is open along the eastern side.
- Regularly sweeping salt and sand into the covered structure after transfers.
- Purchasing salt and sand in quantities that are small enough to fit within the covered storage structure.
- Inspecting the salt and sand storage structure monthly and taking action to minimize discharge.
- Cleaning up any spills that may occur along the transfer of salt to the brine-making area.
- Covering the stormwater inlet when brine transfers are made from the brine mixer to the spray trucks.

#### 9.8 Sector-Specific Non-Numeric Effluent Limits

It was determined that GWMP Maintenance Complex and its associated activities are not within a sector where sector-specific non-numeric effluent limits apply.

#### 9.9 Employee Training

GWMP Maintenance Complex staff will conduct the following training actions to minimize stormwater exposure to contaminants.

Effective training and awareness on this SWP3 will be provided to all GWMP Maintenance Complex employees, including all members of the SWP3 Team. Employee training will serve to educate employees about general stormwater issues and the requirements of the SWP3. Training will include background information on the components and goals of the SWP3, BMPs, and inspection procedures. Training will cover specific control measures, monitoring, inspection, planning, reporting, and documentation requirements in the SWP3.

All new employees will be trained within sixty days of their start date. A record of this training will be kept in the personnel file in accordance with the GWMP environmental management system (EMS) documentation and recordkeeping system.

All employees will participate in annual refresher training. Attendance for training will be recorded and maintained with this plan for at least three years. A template training sign-in sheet is located in <u>Appendix F</u>. This sheet is to be used to demonstrate that training took place and serves as the official training record.

The training program will be reviewed biennially by the SWP3 Team to determine its effectiveness and to make any necessary changes.

#### 9.10 Non-Stormwater Discharges

The VPDES VAR05 requires GWMP Maintenance Complex staff to eliminate unauthorized non-stormwater discharges. No activities at GWMP Maintenance Complex result in unauthorized non-stormwater discharges under the VPDES VAR05.

#### 9.11 Waste, Garbage, and Floatable Debris

GWMP Maintenance Complex staff will conduct the following actions to minimize stormwater exposure to waste, garbage, and floatable debris.

- Placing trash and recyclables in appropriate containers and keeping outdoor containers closed at all times.
- Regularly sweeping all areas. Sweeping indoor dirt and debris into piles and disposing of those piles in the trash. Not sweeping indoor dirt and debris out the door.
- Maintaining drain grates free of debris.

#### 9.12 Dust Generation and Vehicle Tracking of Industrial Materials

GWMP Maintenance Complex staff will conduct the following actions to minimize generation of dust and off-site tracking of raw, final, or waste materials.

- Regularly sweeping salt and sand into the covered salt and sand structure after transfers.
- Regularly sweeping all areas. Sweeping indoor dirt and debris into piles and disposing of those piles in the trash. Not sweeping indoor dirt and debris out the door.
- Covering bulky equipment scheduled for disposal with waterproof tarps.
- Placing trash and recyclables in appropriate containers and keeping outdoor containers closed at all times.
- Conducting all vehicle and equipment washing offsite at a commercial car wash.

#### Table A. Implementation Schedule for Best Management Practices

BMP Summary	Potential Pollutant	Implementation Schedule
Annual refresher training	All pollutants	Annually
Cleaning sediment from storm grates	Debris, litter, sediment	Regularly
Cleaning up spills and leaks promptly using dry methods	Solvents, paint, oil, gasoline, diesel, other liquids	Immediately upon discovery
Conducting all vehicle and equipment washing offsite at a commercial car wash	All pollutants	Ongoing
Covering bulky equipment scheduled for disposal with waterproof tarps	All pollutants	Ongoing
EAP training	All pollutants	Annually

BMP Summary	Potential Pollutant	Implementation Schedule
Enclosing and covering salt and sand storage	Salt and sand	Ongoing
piles		
Sweeping up spills that may occur during	Salt	Ongoing
transfer of salt to the brine-making area.		
Covering the stormwater drain when	Salt Brine	Ongoing
transferring brine to the spray trucks.		
Initial training	All pollutants	Within 60 days of new hire
Inspecting the salt and sand storage structure	Salt and sand	Monthly and upon discovery
and taking action to minimize discharge		
Inspecting, testing, maintaining, and repairing	Oil, gasoline, diesel, other	Regularly and upon
stored industrial equipment to avoid leaks,	liquids	discovery
spills, and other releases		
Maintaining all equipment necessary for control	All pollutants	Ongoing and upon discovery
measures in effective operating condition and		
making necessary repairs		
Maintaining all materials in an orderly fashion	All pollutants	Ongoing
with labels intact		
Maintaining barriers between material storage	All pollutants	Ongoing
and traffic areas		
Maintaining drain grates free of debris	Debris, litter, sediment	Ongoing
Maintaining spill clean-up materials such as	Gasoline, diesel	Ongoing
absorbent pads near the fuel dispensing area		
Maintaining weather stripping at the base of	All pollutants	Ongoing
garage doors so water does not flow into		
garages during storm events		On a sin s
Placing plastic tubs with oll-absorbent pads	OII, gasoline, diesel, other	Ongoing
that are unused for extended periods of time	liquids	
Resing track and recyclables in appropriate	Debris litter	Ongoing
sontainers and keeping outdoor containers	Debris, litter	Ongoing
closed at all times		
Providing secondary containment for storage of	Solvents paint oil gasoline	Ongoing
hazardous materials	diesel nesticides toxins	Ongoing
	from lead acid batteries	
	other liquids	
Providing vehicles stored outside with routine	Oil, gasoline, diesel, other	Ongoing
preventative maintenance to keep them in good	liquids	
working order		
Purchasing salt and sand in quantities that are	Salt and sand	Seasonally when salt and
small enough to fit within the covered storage		sand are purchased
structure		
Storing all materials in appropriate containers	All pollutants	Ongoing
Storing hazardous materials not outside	All pollutants	Ongoing
exposed to the elements, including oil, gasoline,		
diesel, pesticides, and lead acid batteries		
Sweeping all areas	Debris, litter, sediment	Regularly
Sweeping salt and sand into the covered	Salt and sand	Regularly
structure after salt transfers		
Using spill/overflow protection equipment	Solvents, paint, oil, gasoline,	Ongoing
	diesel, other liquids	

BMP Summary	Potential Pollutant	Implementation Schedule
When maintaining equipment and vehicles,	Oil, gasoline, diesel, other	Upon discovery
fixing all fluid leaks and wiping off fluid drips	liquids	
When refilling portable containers, placing	Solvents, paint, oil, gasoline,	When applicable
containers first in a compatible plastic tub so	diesel, other liquids	
spills are contained in the tub rather than spilled		
out onto the ground		

# 10. Inspections and Monitoring

The SWP3 Team will monitor the grounds for SWP3 effectiveness on an ongoing basis, and will conduct formal routine facility and quarterly visual inspections, as well as an annual comprehensive site compliance evaluation. Records of inspections and evaluations are kept for at least three years from the date they are performed.

### 10.1 Ongoing Monitoring

On an ongoing basis, GWMP Maintenance Complex staff will observe the grounds for evidence of spills and leaks then identify equipment and practices that may be leaking liquids. Doing so will ensure that the BMPs identified in the SWP3 are being implemented and are effective in minimizing or reducing the threat of pollutant discharge. Any deficiencies in the implementation of the SWP3 that are found will be corrected as soon as practical.

### 10.2 Impaired Waters Monitoring

The VPDES VAR05 requires facilities that discharge to impaired water to monitor for all pollutants for which the water body is impaired and for which a standard analytical method exists.

Stormwater from the facility flows to the Potomac River. EPA's Impaired Water 303(d) List includes information on the Potomac River, which currently has a Total Maximum Daily Load (TMDL) for fecal coliform. No activities at GWMP Maintenance Complex can contribute fecal coliform to the Potomac River.

DEQ or EPA may require monitoring for fecal coliform. A notice of required inspections will be returned to GWMP Maintenance Complex after the Notice of Intent (NOI) and SWP3 have been reviewed by the EPA regional stormwater authority. That notice will include the required monitoring frequency. Upon notification of monitoring requirements, this SWP3 should be updated to reflect this monitoring schedule.

### 10.3 Quarterly Facility Inspection

The SWP3 Team will conduct quarterly facility inspections to evaluate and review the effectiveness of the SWP3, ensuring that BMPs identified in the SWP3 are being implemented and are effective in minimizing or reducing the threat of pollutant discharge. Inspections will be performed during periods when the facility is in operation. At least once each year, the inspection will be conducted during a period when a stormwater discharge is happening; that is, during a storm event. These inspections will be documented with a checklist (<u>Appendix C</u>) and performed by a designated SWP3 team member. The checklist will include a certification that the site is in compliance with the SWP3 and the permit. Deficiencies in the implementation of the SWP3 will be corrected within two weeks. Records of each routine facility inspection will be maintained with the SWP3 and will be kept for at least three years from the date of the inspection.

A template log for tracking routine facility inspections is located in Appendix E.

### 10.4 Quarterly Visual Monitoring

Once each quarter and during a precipitation event, the SWP3 Team will collect stormwater samples from each outfall to assess visually. The Team will conduct the assessment using the Quarterly Visual Monitoring Form (located in <u>Appendix D</u>), considering suspended liquids, floatable debris, oil sheen, and any other obvious indicators of stormwater pollution. If a stormwater pollutant is observed, the Team will locate the source of the pollutant and promptly address the source of the contamination. The Team will then determine whether additional BMPs should be implemented to prevent further stormwater contamination. These visual inspections will be conducted in conjunction with the quarterly facility inspections when possible.

A template log for tracking quarterly visual inspections is located in Appendix E.

#### 10.5 Annual Site Compliance Evaluation

Once a year, the SWP3 Team will complete a comprehensive site compliance evaluation. The purpose of this inspection is to:

• Confirm the accuracy of the description of potential pollution sources;

- Determine the effectiveness of the SWP3; and
- Assess compliance with terms and conditions of the VPDES VAR05.

The evaluation will be conducted by a member of the SWP3 Team, using the Annual Site Evaluation Form (<u>Appendix B</u>). During the annual comprehensive site compliance evaluation, all potential pollution sources will be visually inspected for evidence of actual or potential discharges. Evaluations will include:

- All areas where industrial materials or activities are exposed to stormwater;
- Industrial materials, residue, or trash that may have or could come into contact with stormwater;
- Leaks or spills from industrial equipment, drums, barrels, tanks or other containers that have occurred within the past three years;
- Off-site tracking of industrial or waste materials or sediment where vehicles enter or exit the site;
- Evidence of, or the potential for, pollutants entering the drainage system;
- Evidence of pollutants discharging to surface waters at all facility outfalls, and the condition of and around the outfall, including flow dissipation measures to prevent scouring;
- Review of stormwater related training performed, inspections completed, maintenance performed, quarterly visual examinations, analytical monitoring, and effective operation of control measures, including BMPs;
- Presence of unauthorized nonstormwater discharges.

Based on the results of the evaluation, the SWP3 will be modified as necessary within 30 days. If existing control measures need to be modified or if additional control measures are necessary, implementation will be completed before the next anticipated storm event, if practicable, but not more than 60 days after completion of the comprehensive site evaluation.

The SWP3 Team will write a report summarizing the scope of the evaluation, name(s) of personnel making the evaluation, the date of the evaluation, and all observations relating to the implementation of the SWP3. The report will identify any incidents of noncompliance observed or contain a certification of compliance. Observations in the report will include such things as:

- Location(s) of discharges of pollutants from the site;
- Location(s) of previously unidentified sources of pollutants;
- Location(s) of control measures that need to be maintained or repaired;
- Location(s) of failed control measures that need replacement; and
- Location(s) where additional control measures are needed.

Comprehensive site compliance evaluation records will be maintained for at least three years after the date of the evaluation. A template log for tracking annual site compliance evaluations is located in <u>Appendix E</u>.

#### 10.6 SWP3 Monitoring Schedule

The table below lists the timeline for SWP3 monitoring actions.

Type of Monitoring	Frequency	Responsible Party	Associated Records
Casual	Ongoing	Anyone at the facility	Keep comments with quarterly
			inspection logs.
Visual (during a	Quarterly	SWP3 Team	Quarterly Visual Monitoring form
stormwater event)			
Facility Inspection	Quarterly	SWP3 Team	Quarterly Facility Inspection form
AST Evaluations	Per SPCC requirements	Qualified individuals,	Keep records for at least three
		per the SPCC plan	years
Comprehensive Site	At least annually	SWP3 Team	Annual Site Evaluation Form
Compliance			
Evaluation			
Administrative	Within two weeks of	SWP3 Team	Updated and dated SWP3.
changes to the SWP3	identifying the issue		

Type of Monitoring	Frequency	Responsible Party	Associated Records
Procedural changes	Within 12 weeks of	SWP3 Team	Updated and dated SWP3.
to the SWP3	completing		
	Comprehensive Site		
	Compliance Evaluation		
Employee training on	Within 60 days of start	An individual familiar	Keep training logs for at least
SWP3	date then annually	with the SWP3 and	three years.
	thereafter	Permit and BMPs	

# 10.7 Sampling Data

Existing sampling data records are provided in Appendix H.

# 11. SWP3 Maintenance

In accordance with 9 VAC 25-151-80(F) and (G), the facility maintains the SWP3 in accordance with the following procedures:

- Signing and dating the SWP3, including revisions and compliance documentation.
- Retaining the SWP3 onsite at the facility and making it available immediately to the DEQ or EPA at the time of an onsite inspection or upon request.
- Reviewing and amending the SWP3, within 30 calendar days, whenever:
  - Required to address corrective actions.
  - Construction or a change in design, operation, or maintenance at the facility has a significant effect on the discharge, or the potential for the discharge, of pollutants from the facility.
  - □ Routine inspections or compliance evaluations find deficiencies in control measures, including BMPs.
  - □ Inspections by local, state, or federal officials determine that modifications to the SWP3.
  - □ A spill, leak, unauthorized discharge, or other release occurs, by updating 8.2 Spill History.
  - □ A TMDL is developed that must be incorporated into <u>10.2 Impaired Waters Monitoring</u>.
- Implementing new or modified control measures before the next storm event if possible, but no later than 60 days.

# 12. Appendices

# Appendix A. SWP3 Team Member Roster

#### **Team Leader**

Title:	Chief of Facility Management
Name:	Curtis Rintz
Mobile Phone:	202-438-6621
<b>Responsibilities:</b>	Main SWP3 contact, responsible for development and revision of the facility's SWP3
Team Members	
Title:	Chief of Operations Facility Management
Name:	Jerry Garcia
Mobile Phone:	571-205-2346
Responsibilities:	Ensuring that BMPs are carried out as scheduled
Title:	Engineering Equipment Operator Supervisor
	ISA Certified Arborist MA-4478A
Name:	Michael Papa
Mobile Phone:	202-369-4113
Responsibilities:	Carrying out quarterly inspections; oversee road equipment and drop inlet cleaning
	requirements
Title:	Grounds Crew Supervisor
Name:	Joshua Hartley
Mobile Phone:	731-747-5705
<b>Responsibilities:</b>	Sanitation, Trash truck and recycle requirements

Last updated: July 2022

### Appendix B. Annual Site Evaluation Form

#### Photocopy this document and complete to validate that annual inspections are being performed.

This form is used to assess conditions at the GWMP Maintenance Complex that could impact stormwater quality and the effectiveness of the BMPs chosen to be implemented. Evaluations must include: all BMPs identified in this SWP3 to ensure they are functioning correctly; and a visual inspection of areas where materials or activities are exposed to stormwater as identified in the SWP3. Results of visual evaluations conducted during the year must be taken into consideration during the evaluation.

During the review the evaluator should ask:

1.	Is the area free of debris or residue that could be washed away by stormwater? If No, what are those materials and where did they come from?	Yes	No
1.	Are all pollution sources identified in the SWP3? If No, what additional areas should be included in the SWP3?	Yes	No
2.	Are the BMPs identified and implemented in the SWP3 sufficient and effective? If No, why and what changes should be made?	Yes	No
3.	Are all BMPs identified and implemented in the SWP3 sufficient to prevent or minimize polluted stormwater discharge? If No, what additional BMPs should be identified and implemented?	Yes	No
4.	Were past quarterly visual evaluation records reviewed as part of this Annual Comprehensive Site Compliance Evaluation?	Yes	No
5.	If a major leak or spill of hazardous materials occurred in the past three years, was the area evaluated for the potential for future spills and leaks?	Yes	No
Once and	e the evaluation has been completed, the results should be shared with the entire SWP3 Tear training schedule should be updated as necessary.	n, and th	e SWP3

GWMP Maintenance Complex is in compliance with this SWP3 and with the permit issued by the EPA.

Name:

Date:

Signature:

### Appendix C. Quarterly Facility Inspection Form

#### Photocopy this document and complete to validate that quarterly routine site inspections are being performed.

Quarterly routine site inspections are required for all potential pollutant discharge and exposure areas specified in this SWP3. The goal of these inspections is to make sure that the BMPs identified in the SWP3 are being implemented and are effective in minimizing or reducing the threat of pollutant discharge. Deficiencies in the implementation of the SWP3 must be corrected within two weeks. These records must be maintained with the SWP3 and must be kept for at least three years from the date of the inspection.

Instructions: Complete the log below to track the completion of quarterly inspections. If any deficiencies are identified, please explain on a separate page then document and attach the follow-up procedures.

1.	1. Are the grounds clear of spills and leaks?	Yes	No
2.	2. Are the grounds free of debris such as solid waste, trash and litter?	Yes	No
3.	3. Is the ground below vehicles and equipment free of oil that has leaked from above?	Yes	No
4.	4. Are vehicles and equipment that is stored for extended periods of time drained of fluids, or are absorbent rags or tubs placed below that equipment and regularly maintained?	Yes	No
5.	5. Are all containers of hazardous materials stored inside?	Yes	No
6.	6. Are universal wastes covered and stored in secondary containment?	Yes	No
7.	7. Is the area around the salt and sand storage facility free of excess salt and sand? Have salt and sand been swept back into the storage facility as appropriate? Is the asphalt berm in place during the warm seasons?	Yes	No
8.	8. Are the dumpsters maintained in a closed position?	Yes	No
9.	9. Are dumpsters and trash barrels present in sufficient quantity to contain all the bags of solid waste?	Yes	No
10.	10. Has any evidence of spills or leakage been reported or cleaned since the last quarterly inspection?	No	Yes
11.	11. Since the last quarterly inspection, has any SWP3 Team member observed color, odor, floating solids, foam, oil sheen or other indicators of water pollution in stormwater run-off?	No	Yes
12.	12. Have new employees been trained on the SWP3 within 60 days of their start date?	Yes	No
13.	13. Have measures to address erosion been maintained? Do the measures used to address erosion appear effective?	Yes	No

Inspector's Name:	 Inspection Date:	
Signature: Specific areas inspected (including outfalls):		

# Appendix D. Quarterly Visual Monitoring Form

## Quarterly Visual Monitoring Form

Fill out a separate form for each outfall sampled.

S	ample Location									
Q	uarter / Year:		Date / Tim	e Collected:		Date /	Time Examir	ned:	I	
Q	ualifying Storm	Event?	Yes	No	Runoff Sour	ce:	Rainfall	Sno	owmelt	
С	ollector's									
_ <u>N</u>	ame & Title									
E	xaminer's									
N	ame & Title	Darar	notor Dooo	rintion	Deremeter Characteristics					
_	Parameter	Parar Does the st	neter Desci	npuon mearto have	If Vee, describ	arame	ler Character	Red	Grav	
1	Color	any color?	onnwater ap	pear to have	Other	Je. 76	NOW DIOWN	neu	Gray	
	000	Yes		No (Clear)	ound.					
				(cical)	If not clear, w	hich of t	the following b	est des	cribes the	
~	01	Is the stormwater clear?				clarity of the stormwater?				
Ζ.	Clarity	Yee No.			Suspended Solids Milky/Cloudy Opaque					
		res		NO	Other:					
_		Can you see a rainbow effect or			Which best describes the sheen?					
3.	Oil Sheen	sheen on the water surface?			Rainbow sheet Floating oil globules					
		Yes		No	Other:					
		Does the sa	mple have a	an odor?	If Yes, describ	be: Che	emical Must	y Ro	tten Eggs	
4.	Odor	Vee		No	Sewage S	our Milk	<ul> <li>Oil/Petrole</li> </ul>	um		
		165		NO	Other:					
5	Floating	Is there any	thing on the	surface of	If Yes, describ	be: S	uds 🛛 Oily Fi	lm (	Garbage	
5.	Solids	the sample?	?		Sewage N	/ater Fo	wl Excrement			
	001100	Yes		No	Other:					
6.	Suspended	Is there any	thing susper	nded in the	Describe:					
	Solids	sample?								
_		Yes		No						
		*	**Leave sar	nple undistur	bed for 30 mil	nutes.*'	**			
		Is there any	thing settled	I on the	Describe: (no	te type,	size and mate	erial aft	er sample	
7.	Settled Solids	bottom of th	e sample?		is not disturbe	ed for 30	o minutes)			
		Yes		No						
		Does foam	or material f	orm on the	Describe:					
8.	Foam	top of the sa	ample surfac	ce if you						
		snake it?								
		Yes		NO						

 If there are any visible indicators of pollution identify (1) where the pollution may come from and (2) any corrective actions taken.

Stormwater Collector's Signature and Date:

Stormwater Examiner's Signature and Date:

Note - Sample should be collected and analyzed in a colorless glass or plastic bottle.

Instructions for Completing The Visual Monitoring Form

Per PART V. INSPECTIONS, MONITORING, AND REPORTING, you must collect a stormwater sample from each outfall once each quarter for the entire permit term and conduct a visual assessment of each sample. You must follow the monitoring procedures outlined in Part V.C. These samples should be collected in such a manner that they are representative of the stormwater discharge from that outfall. Each assessment must be kept onsite with your SWPPP and available for inspection and review by the Department at anytime.

First, fill out all information on the top of the visual monitoring form. A qualifying storm event is any storm where there is a measurable discharge. Then, take a grab sample in a clear container. Evaluate the sample in a well-lit area for the following parameters:

- Color: Record the best description of the sample color in the appropriate space on the form.
- Clarity: This parameter refers to how cloudy the sample is. It is usually an indication of fewer pollutants in the water if the sample is clear or transparent. If the clarity has changed since the last sample, try to identify what might have caused this to happen.
  - Clear Sample doesn't block any light; can be seen through regardless of color.
  - Cloudy Sample blocks some light; objects not clear but can be identified looking through the sample.
  - Very Cloudy Sample blocks most light; objects cannot be identified looking through the sample.
  - Opaque Sample blocks all light; objects cannot be seen when looking through the sample.
- Oil Sheen: Record whether or not an oil sheen is present. If a film of iridescent color is noted on the surface of the sample or a rainbow effect appears to be floating on the surface of the water, this usually indicates oil is present.
- 4. Odor: If sample has no odor other than natural rainwater or snowmelt, write "NO" on the visual monitoring form. Note the presence of any of the following odors if detected, such as gasoline, diesel, oil, solvents (WD-40, other petroleum products, etc.), garbage, fishy, sweet/sugary, any other unusual odors not normally present in clean runoff from the area sampled.
- 5. Floating Solids: A contaminated flow may contain solids or liquids floating on the surface. Identifying floatables can aid in finding the source of the contamination. Examples of floatables are spoiled food products, oils, plant parts, solvents, sawdust, foams and fuel. Give a general description of the type of floating solids present (wood chips, leaf debris, algae, etc) in the general comments section for each sample. Identify amount of floating solids as described below.
  - High More than 20% of the surface of the sample is covered with floating solids.
  - Moderate Less than 20% of the surface of the sample is covered with floating solids.
  - Slight Only a few floating particles observed on the surface of the sample.
  - None No floating solids present on the surface of the sample.
- 6. Suspended solids: Record whether or not suspended solids are present in the sample. Suspended solids are particles floating inside the column of water, not on top, and may contribute to changes in water color or clarity. Cracked or deteriorated concrete or peeling surface paint at an outfall usually indicates the presence of severely contaminated discharges. Contaminants causing this type of damage are usually very acidic or basic.

#### ----- WAIT 30 MINUTES

Leave the sample undisturbed for 30 minutes to allow the water and anything in it to settle.

- Settled Solids: After 30 minutes has passed, give a general description of the type of settled solids present (sand, decayed plant matter, rust particles, etc.) in the general comments section.
- Foam: After completing #7, shake the bottle gently. Record foam results on the form as they most closely
  match one of the descriptions listed below.
  - None Most bubbles break down within ten (10) seconds of shaking; only a few large bubbles persist longer than ten (10) seconds.
  - Moderate Many small bubbles are present but these bubbles persist for less than two (minutes) after shaking.
  - High Many small bubbles are present and they persist longer than two (2) minutes after shaking.
- Detail any concerns, corrective actions taken and any other indicators of pollution present in the sample. This
  should include the identified source if there are visible indicators present in the sample. The person performing
  test must sign and date each form.

# Appendix E. Quarterly/Annual Facility Inspection Log

Use this or a similar form to track and maintain a schedule of quarterly/annual facility inspections.

Date and Time of Inspection		
Type of Inspection		
Area of Inspection		
Weather Information		
Discharges Occurring at Time of Inspection		
Previously Unidentified Discharges		
Control Measures Needing Maintenance or Repairs		
Failed Control Measures		
Incidents of Noncomplianc e Observed		
Additional Control Measures Needed		
Employee's Name		
Employee's Signature		

Appendix F. Annual Employee Training Recordkeeping Form Use this or a similar form to track attendance of annual employee SWP3 training. Description and scope of training:

Date	Employee's Name	Employee's Signature

Appendix G. 2014 General Virginia Pollutant Discharge Elimination System (VPDES) Permit for Discharges of Stormwater Associated with Industrial Activity (VAR05)

The 2014 General Virginia Pollutant Discharge Elimination System (VPDES) Permit for Discharges of Stormwater Associated with Industrial Activity (VAR05) is codified at 9 VAC 25-151 and available online at: <a href="http://www.deq.virginia.gov/Programs/Water/PermittingCompliance/PollutionDischargeElimination/PermitsFees">http://www.deq.virginia.gov/Programs/Water/PermittingCompliance/PollutionDischargeElimination/PermitsFees</a>. aspx#isw. The facility's permit number is VAR051790.

# Appendix H. Sampling Data Records

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