



# **Municipal Separate Storm Sewer System (MS4) Fiscal Year 2025 Annual Report**

**General VPDES Permit for  
Small Municipal Separate Storm Sewer Systems**

**No. VAR040111**

## **George Washington Memorial Parkway**

**Fiscal Year 2025 Annual Report  
July 1, 2024 – June 30, 2025**

*Submittal to VADEQ  
March 2026*

**Submitted by:**

National Park Service, George Washington Memorial Parkway  
Division of Resource Management  
700 George Washington Memorial Parkway  
McLean, Virginia 22101



## Table of Contents

1.0	Introduction .....	4
2.0	Background Information .....	5
3.0	Status of Compliance with Fiscal Year 2021 Conditions .....	6
3.1	Public Education and Outreach (MCM #1) .....	6
3.1.A	Signage .....	6
3.1.B	Media Materials .....	7
3.2	Public Involvement/Participation (MCM #2) .....	8
3.2.A	Stormwater Webpage .....	8
3.2.B	Public Involvement Opportunities .....	8
3.3	Illicit Discharge Detection and Elimination (MCM #3) .....	11
3.3.A	Procedures and Forms Review .....	12
3.3.B	Dry Weather Outfall Screening .....	12
3.3.C	Illicit Discharge Tracking .....	13
3.4	Construction Site Stormwater Runoff Control (MCM #4) .....	14
3.4.A	Procedures and Forms Review .....	14
3.5	Post Construction Stormwater Management (MCM #5) .....	177
3.6	Pollution Prevention/Good Housekpping for Municipal Operation (MCM #6) .....	18
3.6.A	Procedures Review .....	199
3.6.B	Stormwater Pollution Prevention Plans for High-Risk Facilities .....	199
3.6.C	Training .....	199
4.0	MS4 Program Plan Assessment .....	20
5.0	Special Conditions Associated with TMDLs .....	21

### **Appendices**

- Appendix A Public Involvement / Participation
- Appendix B Illicit Discharge Detection and Elimination



## CERTIFICATION

**Report: Municipal Separate Storm Sewer System (MS4) Fiscal Year 2025 Annual Report**

**Permit No.: General VPDES Permit for Small Municipal Separate Storm Sewer Systems  
No. VAR040111**

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.

\_\_\_\_\_

\_\_\_\_ May 13, 2026 \_\_\_\_\_

**Name**

**Date**

Superintendent, George Washington Memorial Parkway

**Title**



## 1.0 Introduction

---

This Fiscal Year 2025 (FY25) MS4 General Permit Annual Report has been prepared by the George Washington Memorial Parkway (GWMP) in accordance with General VPDES (Virginia Pollutant Discharge Elimination System) Permit for Discharges of Stormwater from Small Municipal Separate Storm Sewer Systems (9VAC25-890-40 et seq.). The Virginia Department of Environmental Quality (DEQ) issued the most recent permit (VAR040111) effective November 1, 2023.

Under the terms of the General Permit, the GWMP has developed a Municipal Separate Storm Sewer System (MS4) Program Plan to implement six minimum control measures (MCMs) aimed at reducing the discharge of pollutants to the “maximum extent practicable.” Minimum control measures are presented below.

GWMP acknowledges that the Action Plan was scheduled for an update in May 2024 and the TMDL plan in November 2024. Due to staffing changes and a lapse in appropriations in 2025, GWMP has been unable to update both plans and complete our annual report. GWMP is actively working to resolve the identified issues. This annual report, and TMDL plan prepared in 2026, will target deficiencies in our reporting, and will continue to keep VA DEQ involved with any remaining reporting requirements.

### ***Six Minimum Control Measures***

1. Public Education and Outreach
2. Public Participation and Involvement
3. Illicit Discharge Detection and Elimination
4. Construction Site Runoff Control
5. Post-Construction Runoff Control
6. Pollution Prevention and Good Housekeeping

***The park reviewed each MCM to determine the MS4 program’s effectiveness and decided that no changes are currently needed to the MS4 Program Plan. During this reporting period, GWMP witnessed a change in staff and capacity to adequately report and monitor MCM requirements. Multiple calls and emails between GWMP and DEQ staff during the reporting period, identified these shortfalls. If critical staffing gaps continue into the next reporting period, GWMP will need to update MCM to align with staffing capacity and reporting requirements.***

The MS4 Program Plan has been updated in accordance with the requirements of Part I C of the 2023 General Permit. The MS4 Program Plan is available online at the <https://parkplanning.nps.gov/ms4va>, which has all of the park MS4 documentation.

The General Permit requires that the GWMP submit annual reports no later than October 1 covering the preceding July 1 through June 30 reporting period. This annual report covers the period of July 1, 2024, through June 30, 2025. Part I D of the General Permit outlines the requirements for the annual report. The following is a summary of the requirements and where the information is located in this annual report.



Table 1 MS4 Permit Annual Reporting Requirements

Permit	Requirement	Location
Part I D 2 a-b	2. The annual report shall include the following general information: a. The permittee, system name, and permit number; b. The reporting period for which the annual report is being submitted;	Section 2
Part I D 2 c	c. A signed certification as per Part III K;	Certification page
Part I D 2 d	d. Each annual reporting item as specified in an MCM in Part I E; and,	Section 3
Part I D 2 e	e. An evaluation of the MS4 program implementation, including a review of each MCM, to determine the MS4 program's effectiveness and whether or not changes to the MS4 program plan are necessary.	Section 4
Part I D 3	3. For permittees receiving initial coverage under this general VPDES permit for the discharge of stormwater, the annual report shall include a status update on each component of the MS4 program plan being developed. Once the MS4 program plan has been updated to include implementation of a specific MCM in Part I E, the permittee shall follow the reporting requirements established in Part I D 2.	Not applicable
Part I D 4	4. For those permittees with requirements established under Part II A, the annual report shall include a status report on the implementation of the Chesapeake Bay TMDL action plan in accordance with Part II A of this permit including any revisions to the plan.	Section 5
Part I D 5	5. For those permittees with requirements established under Part II B, the annual report shall include a status report on the implementation of the local TMDL action plans in accordance with Part II B including any revisions to the plan.	Section 5

## 2.0 Background Information

This section provides background information as required by Part I D 2 a-b of the General Permit.

**Permittee:** George Washington Memorial Parkway  
**System Name:** George Washington Memorial Parkway MS4  
**Permit Number:** VAR040111  
**Reporting Period:** July 1, 2024 – June 30, 2025



### 3.0 Status of Compliance with Fiscal Year 2025 Conditions

This section provides an overview of progress made toward meeting each MCM. Each MCM includes the specific annual reporting items as specified in Part I E of the General Permit followed by a more detailed description of each best management practice (BMP) contained in the MS4 Program Plan. Supporting materials are located in the appendices as referenced.

#### 3.1 Public Education and Outreach (MCM #1)

In accordance with Part I E 1 g of the General Permit, the following information must be reported in the annual report:

	Annual Report Requirement	Documentation
✓	(1) A list of the high-priority stormwater issues the permittee addressed in the public education and outreach program.	<ul style="list-style-type: none"> <li>▪ Chesapeake Bay Nutrients</li> <li>▪ Pet Wastes</li> <li>▪ Illicit Discharges</li> </ul>
✓	(2) A list of strategies used to communicate each high priority stormwater issue.	See BMPs 3.1.A-3.1.C.

##### 3.1. A Signage

The MS4 Program Plan establishes the following measurable goals and evaluation criteria:

- **BMP Goal:** The Park aims to make at least one signage focused on at least one of the high-priority topics identified above available to the public per each year of coverage under this MS4 permit.
- **Intended Audience:** The public audience is park visitors that utilize park facilities and grounds.
- **Metric:** The key metric will be the number of signs produced and posted.

BMPs from MS4 Program Plan	FY25 Activities
Temporary or permanent signage in public places or facilities, or storm drain stenciling.  <i>This BMP is related to communicating around pet waste.</i>	There was no new signage added to the GWMP in FY 2025.  Note: NPS tries to minimize signage on National Historic property as required per National Historic Preservation requirements.



### 3.1. B Media Materials

The MS4 Program Plan establishes the following measurable goals and evaluation criteria:

- **BMP Goal:** The Park aims to post at least one social media message focused on stormwater and the high-priority issues per quarter (4 messages per year) on Facebook.
- **Intended Audience:** The public audience is park visitors that “follow” GWMP on the social media sites such as Facebook. This audience includes both local and non-local members of the public.
- **Metric:** The metric will be based on the number of “Likes” and/or reposting’s of the park’s media messages.

BMPs from MS4 Program Plan	FY25 Activities
<p>Social media messages</p> <p><i>This BMP is related to communicating illicit discharge and Chesapeake Bay Nutrients.</i></p>	<p>Six social media posts were made during permit year.</p> <ul style="list-style-type: none"> <li>• GWMP – Youth Trash Cleanup – 9/16/2024 (4 likes, 1 share)</li> <li>• GWMP – Public lands day – trash cleanup – 9/30/2024 (15 likes, 1 comment)</li> <li>• GWMP – Bald eagles observations and history of DDT impacts – 1/5/2025 (11 likes)</li> <li>• GWMP – Trash Clean-up – 3/24/2025 (12 likes, 2 shares)</li> <li>• GWMP – Take Your Dog to Work Day – message about effects of pet waste – 6/20/2025 (7 likes)</li> <li>• GWMP – Mussel released in Potomac River mitigation – 7/3/2025 (105 likes, 6 comments, 4 shares)</li> </ul>



### 3.2 Public Involvement/Participation (MCM #2)

Each of the activities listed in Section 3.2 were evaluated and found effective for garnering public involvement and participation in improving water quality. In accordance with Part I E 2 f of the General Permit, the following information must be reported in the annual report:

	Annual Report Requirement	Documentation
✓	(1) A summary of any public input on the MS4 program received (including stormwater complaints) and how the permittee responded.	No public input on the MS4 program was received during this reporting period.
✓	(2) A webpage address to the permittee's MS4 program and stormwater website.	The webpage address is <a href="https://parkplanning.nps.gov/ms4va">https://parkplanning.nps.gov/ms4va</a> See BMP 3.2. A.
✓	(3) A description of the public involvement activities implemented by the permittee.	See BMP 3.2. B.
✓	(4) A report of the metric as defined for each activity and an evaluation as to whether or not the activity is beneficial to improving water quality.	See BMP 3.2. B.
✓	(5) The names of other MS4 permittees with whom the permittee collaborated in the public involvement opportunities.	The GWMP did not collaborate with any jurisdiction during this reporting period.

#### 3.2. A Stormwater Webpage

The objective of the stormwater webpage is to ensure that the public has readily available access to all MS4 program documents and reporting mechanisms.

The MS4 Program Plan establishes the following measurable goals and evaluation criteria: "The GWMP website on which the park posts MS4 information will be the primary mechanism by which the public can review pertinent stormwater/MS4 program information as well as locate contact information for GWMP employees who will be identified as the point-of-contact(s) for stormwater issues."



BMPs from MS4 Program Plan	FY25 Activities
<p>Host the stormwater webpage with the required permit information.</p>	<p>The contact information was the only item updated on GWMP’s stormwater webpage during this reporting period,</p> <p>See Appendix A for a snapshot of the webpage.</p>

### 3.2. B Public Involvement Opportunities

The objective of this BMP is to increase the public’s awareness and participation in the GWMP’s water quality and pollution prevention efforts.

The MS4 Program Plan establishes the following measurable goals and evaluation criteria: “GWMP commits to four activities per year in accordance with the park’s MS4 permit.” Due to lack of staff, GWMP was only able to accomplish two of the four activities as summarized below:



BMPs from MS4 Program Plan	FY25 Activities
<p>Volunteer Cleanups: Conduct one to two cleanups each permit year and report the number of full trash bags collected.</p>	<p>For trash cleanup, GWMP had over 2,600 volunteers contribute almost 3,000 hours of service. 1,406 bags of trash were cleaned up (almost 15,000 pounds of litter).</p>
<p>Public presentation of the visitor interpretation video called “Leave No Trace”: Conduct one to two viewings and report estimated number of visitors who viewed the video.</p>	<p>The “Leave No Trace” video was not shown at the Great Falls Visitor Center during the permit year.</p>
<p>Representation of GWMP and Regional personnel on local agency stormwater management panels: Participate in at least two meetings each permit year and report the number of meetings attended.</p>	<p>Due to lack of capacity, GWMP staff did not participate in any panels related to stormwater management during the permit year.</p>
<p>Work with park partners to present watershed and stormwater management information to public audiences: Update partner work plans to incorporate information about stormwater management and report the number of people receiving the information.</p>	<p>GWMP partners include the Friends of the Mount Vernon Trail and the Friends of Dyke Marsh. There were no updates to partner plans during the reporting period.</p>



### 3.3 Illicit Discharge Detection and Elimination (MCM #3)

In accordance with Part I E 3 e of the General Permit, the following information must be reported in the annual report:

	Annual Report Requirement	Documentation
✓	(1) A confirmation statement that the MS4 map and information table have been updated to reflect any changes to the MS4 occurring on or before June 30 of the reporting year.	GWMP made no updates to the MS4 maps during the reporting period.
✓	(2) The total number of outfalls screened during the reporting period as part of the dry weather screening program.	Due to staffing capacity, no outfall screening was completed during the reporting period as part of the dry weather screening program
✓	(3) A list of illicit discharges to the MS4 including spills reaching the MS4 with information as follows: <ul style="list-style-type: none"> <li>▪ The source of illicit discharge</li> <li>▪ The dates that the discharge was observed, reported, or both</li> <li>▪ Whether the discharge was discovered by the permittee during dry weather screening, reported by the public, or other method</li> <li>▪ How the investigation was resolved</li> <li>▪ A description of any follow-up activities</li> <li>▪ The date the investigation was closed</li> </ul>	See BMP 3.3.C.



### 3.3. A Procedures and Forms Review

The objective of this BMP is to ensure that written procedures are in place to detect, identify, and address unauthorized non-stormwater discharges and illegal dumping to the storm sewer system. These procedures provide an added level of consistency to effectively prohibit illicit discharges and illegal dumping to the storm sewer system, and to conduct enforcement actions as necessary.

The MS4 Program Plan establishes the following measurable goals and evaluation criteria: “Park staff will review pertinent (illicit discharge detection and elimination) IDDE written procedures and forms once to ensure they are comprehensive and reflect any new information based on any previous year’s IDDE investigations.”

BMPs from MS4 Program Plan	FY25 Activities
Review and update (as needed) every two years the IDDE written procedures and “Storm Water Outfall Dry Weather Screening Inspection Form.”	The IDDE written procedures and Stormwater Outfall Dry Weather Screening Inspection form were reviewed and updated per requests made by DEQ during the 2022 audit. The inspection form and procedures are available on the park website. No additional updates and/or changes were made to the procedures or the form in FY 2025.

### 3.3. B Dry Weather Outfall Screening

The objective of this BMP is to identify and eliminate illicit discharges as soon as possible to minimize impacts to water quality. The GWMP’s IDDE Procedures are documented in the MS4 Program Plan.

The MS4 Program Plan establishes the following measurable goals and evaluation criteria: “Park staff will strive to screen 50 outfalls a year such that no more than 50% are screened in the previous 12-month period”.

BMPs from MS4 Program Plan	FY25 Activities
Perform annual dry weather screening of 50 outfalls.	During FY 2025, 0 outfalls were screened, due to staffing capacity. A copy of the screening form is located in Appendix B with note that screening was not completed during this permit year.



### 3.3.C Illicit Discharge Tracking

The General Permit requires that the GWMP track and process complaints about potential illicit discharges and to coordinate an appropriate response. Potential illicit discharges are identified through public reporting in MCM #1, the dry weather outfall screening program in BMP 3.3.B, and staff reporting in MCM #6.

The MS4 Program Plan establishes the following measurable goals and evaluation criteria: “Investigation information will be maintained in an electronic log.” At a minimum the log tracks the data in Table 4.

BMPs from MS4 Program Plan	FY25 Activities
<p>Maintain illicit discharge tracking log.</p>	<p>There were no illicit discharges reported in FY 2025.</p> <p>The NPS National Capital Region created an Emergency Response Plan in March 2024 and the GWMP developed our own Emergency Spill Response Checklist in January 2024 for documenting illicit spills, including the following (*items are required information for MS4 permit reporting):</p> <ul style="list-style-type: none"> <li>• Date Added</li> <li>• Location</li> <li>• Severity</li> <li>• POC</li> <li>• The source of illicit discharge*</li> <li>• The dates that the discharge was observed, reported, or both*</li> <li>• Whether the discharge was discovered by the permittee during dry weather screening, reported by the public, or other method*</li> <li>• How the investigation was resolved*</li> <li>• A description of any follow-up activities*</li> <li>• The date the investigation was closed*</li> <li>• "Actual work (in hours)" - for cost recovery tracking purposes</li> </ul>



### 3.4 Construction Site Stormwater Runoff Control (MCM #4)

In accordance with Part I E 4 d of the General Permit, the following information must be reported in the annual report:

	Annual Report Requirement	Documentation
✓	<p>(1) If the permittee implements a construction site stormwater runoff program in accordance with Part I E 4 a (3):</p> <ul style="list-style-type: none"> <li>▪ A confirmation that land disturbing projects that occurred during the reporting period have been conducted in accordance with the current department approved standards and specifications for erosion and sediment control.</li> <li>▪ If one or more of the land disturbing projects were not conducted with the department approved standards and specifications, an explanation as to why the projects did not conform to the approved standards and specifications.</li> </ul>	<p>The GWMP is a federal entity that has not developed standards and specifications as described in Part I E 4 a (4) of the permit and thus is not required to provide the annual reporting information specified for this MCM. The GWMP MCM #4 activities are described in the MS4 Program Plan – see BMP 3.4. A.</p>

#### 3.4. A Procedures and Forms Review

The objective of this BMP is to ensure that the GWMP has in place processes and procedures necessary to address discharges from regulated construction site stormwater runoff.

The MS4 Program Plan establishes the following measurable goals and evaluation criteria: “Park staff will review stormwater management practices at construction sites affecting more than 2,500 square feet to ensure contractors are meeting contract obligations.”



BMPs from MS4 Program Plan	FY25 Activities
<p>Conduct at least two site visits per permit year at construction sites that disturb 2,500 square feet or more of soil. Identify non-compliance and require the contractor to rectify the issue(s).</p>	<p>There was one project that was over 2500 square feet of disturbance. The Project was the North Parkway Rehabilitation Project. The Project was conducted in accordance with the current department approved standards and specifications for erosion and sediment control. The project is covered under Virginia Stormwater Construction General Permit.</p> <p>Inspections were conducted (one inspection every four days) for the most part, every Tuesday and every Friday, yielding 99 inspections during the permit year.</p> <p>During the winter months (downtime season) an average of 6 items were found to be in need of correction per report generated and during the rest of the year an average of 4 items per report were found (construction season). Compared to last year's construction season, there was a drop in recorded items due to a big portion of the project already completed with asphalt surface and curb. Thus, reducing the denuded areas dramatically compared to a year ago. Most of these items were minor in nature such as inlet protection aggregates getting clogged, dust allying problems, mud tracking into roadway, compost filter berms overwhelmed with sediment and inlet filter bags filled with sediment. All these issues were assigned the maximum number of days allowed to be fixed (7 days per occurrence) per GCP. The project contractor usually fixed the issues well within the 7 days but sometimes they were fixed past the 7-day mark. Even though they were addressed past the due date, most of those items were of a maintenance nature such as sediment accumulations in the bags, inlet protection aggregates getting clogged, filter socks ripped due to usage and most of the ESC was still somewhat functional.</p> <p>Some breaching of the Erosion and Sediment Controls (ESC) were documented, and corrected on a priority basis, by restoring the initial ESC as</p>



	<p>designed and on some occasions by enhancing the area with additional ESC. For example, during the month of February (2025) various inlet structures along the face of curb were found to be out of compliance by not having a sediment bag installed in them. This was due to the newly installed drainage inlets and pipes systems as well as permanent asphalt installed around them, making them "active", triggering the need of ESC controls. No evidence was observed of sediment entering the drainage system at these locations. Another example, a filter sock berm at low locations along the roadway, did not adequately control sediment deposition during major rain events. The project contractor corrected this issue by enhancing the areas with additional filter sock berms to retain sediment as intended.</p> <p>This project will continue into FY2026. A representative is always on-site from Federal Highways. Information can be found at the park website (<a href="#">ParkPlanning - 2018 GWMP North Section Rehabilitation EA (nps.gov)</a>)</p>
--	--



### 3.5 Post Construction Stormwater Management (MCM #5)

In accordance with Part I E 5 i of the General Permit, the following information must be reported in the annual report:

	Annual Report Requirement	Documentation
✓	<p>(1) If the permittee implements a Virginia Stormwater Management Program in accordance with Part I E 5 a (1) and (2):</p> <ul style="list-style-type: none"> <li>▪ The number of privately owned stormwater facility inspections conducted.</li> <li>▪ The number of enforcement actions initiated by the permittee to ensure long-term maintenance of privately owned stormwater management facilities including the type of enforcement action.</li> </ul>	<p>The GWMP is a federal entity that has not developed standards and specifications as described in Part I E 5 a (4) of the permit and thus is not required to provide the annual reporting information specified.</p>
✓	<p>(2) The total number of inspections conducted on stormwater management facilities owned or operated by the permittee.</p>	<p>Currently GWMP does not own or operate any stormwater management facilities in the MS4.</p>
✓	<p>(3) A description of the significant maintenance, repair, or retrofit activities performed on the stormwater management facilities owned and operated by the permittee to ensure it continues to perform as designed. This does not include routine activities such as grass mowing or trash collection.</p>	<p>NPS operates one BMP in the park, which was constructed in January 2020 (Dyke Marsh Phase I). During the reporting period the Dyke Marsh Phase 3 work involved replenishing 884 linear feet of sill with additional stone, to off-set elevation changes to improve performance of the dyke system. 2 site visits were conducted in FY2025.</p>
✓	<p>(4) A confirmation statement that the permittee submitted stormwater management facility information through the Virginia Construction General Permit database for those land disturbing activities for which the permittee was required to obtain coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities in accordance with Part I E 5 f or a statement that the permittee did not complete any projects requiring coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities.</p>	<p>One project was subject to the Virginia Joint Permit Application (JPA) between DEQ, VMRC, USACE for maintenance - construction activities on the BMP (Dyke Marsh project) in tidal waters. Another project was subject to the Virginia Construction General Permit for land disturbing activities (North Parkway project) the required permitting was obtained through the Virginia Department of Environmental Quality.</p>
✓	<p>(5) A confirmation statement that the permittee electronically reported BMPs using</p>	<p>There were no additional BMPs added to GWMP in FY 2025. Therefore, no report</p>



	Annual Report Requirement	Documentation
	the DEQ BMP Warehouse in accordance with Part I E 5 g and the date on which the information was submitted.	was submitted to the DEQ BMP Warehouse.

### 3.6 Pollution Prevention/Good Housekeeping for Municipal Operation (MCM #6)

In accordance with Part I E 6 q of the General Permit, the following information must be reported in the annual report:

	Annual Report Requirement	Documentation
✓	(1) A summary of any operational procedures developed or modified in accordance with Part I E 6 a during the reporting period.	See BMP 3.6. A.
✓	(2) A summary of any new stormwater pollution prevention plans (SWPPPs) developed in accordance with Part I E 6 c during the reporting period.	No new SWPPPs were developed during the reporting period.
✓	(3) A summary of any SWPPPs modified in accordance with Part I E 6 f or the rationale of any high priority facilities de-listed in accordance with Part 1 E 6 h during the reporting period.	No SWPPPs were modified in FY2025.
✓	(4) A summary of any new turf and landscape nutrient management plans developed that includes: <ul style="list-style-type: none"> <li>▪ Location and total acreage of each land area.</li> <li>▪ The date of the approved nutrient management plan.</li> </ul>	No updates were made to the turf and landscape nutrient management plan (it was last updated in June 2022).
✓	(5) A list of training events conducted in accordance with Part I E 6 m, including the following information: <ul style="list-style-type: none"> <li>▪ The date of the training event.</li> <li>▪ The number of employees who attended the training event.</li> <li>▪ The objective of the training event.</li> </ul>	No training events were conducted during the permit year, due to staffing capacity.



### 3.6.A Procedures Review

The objective of this BMP is to implement pollution prevention procedures for operation and maintenance activities as required in Part I E 6 a of the General Permit.

The MS4 Program Plan establishes the following measurable goals and evaluation criteria: “Park staff will review stormwater good housekeeping and pollution prevention practices and make updates as appropriate.”

BMPs from MS4 Program Plan	FY25 Activities
Review and update (as needed) every two years the written procedures and associated training content for employees.	No review or updates were done during the permit year, due to staffing capacity.

### 3.6. B Stormwater Pollution Prevention Plans for High-Risk Facilities

The objective of this BMP is to reduce and prevent the discharge of pollutants from high-priority facilities through SWPPPs and other pollution prevention measures.

The MS4 Program Plan establishes the following measurable goals and evaluation criteria: “Two locations are considered high-priority facilities that have the potential to discharge pollutants in accordance with the MS4 permit. Both locations have a written SWPPP in place (GWMP Maintenance Complex and Daingerfield Island).”

BMPs from MS4 Program Plan	FY25 Activities
Implement SWPPPs.	The GWMP continued to implement SWPPPs for the Maintenance Complex and Daingerfield Island. No Annual Inspections were conducted during the reporting period due to staffing capacity.
Review high-priority sites after incidents and update SWPPPs, if necessary.	There were no spills reported in FY 2025 for GWMP Maintenance Complex and Daingerfield Island.

### 3.6.C Training

The purpose of this BMP is to implement a training plan in accordance with Part I E 6 m of the General Permit.

The MS4 Program Plan establishes the following measurable goals and evaluation criteria: “GWMP will maintain documentation of each training event for a minimum of 3 years, including date, number of attendees, and objective.”



BMPs from MS4 Program Plan	FY25 Activities
Recognition and reporting of illicit discharges and spill response	<p>Two GWMP employees (February 2024) participated in the local HAZWOPER training,</p> <p>Staff have access to illicit discharge and good housekeeping <a href="#">training</a>.</p> <p>The objective of the presentation is for staff to know their roles and responsibilities in illicit discharge recognition, understand what actions can be taken, and how to recognize and report illicit discharges.</p>
Pollution prevention and good housekeeping training.	<p>See above. The copy of the presentation contains the objective of the training. The park developed an internal spill response plan, including standard operating procedures, flyers, and cards and stickers to include in all vehicles.</p>
Virginia Pesticide Control Act, Virginia Erosion and Sediment Control Law, and Virginia Stormwater Management Act.	<p>GWMP has one licensed applicator (Mireya Stirzaker) who applies herbicide along the parkway. GWMP also requires contractors and volunteers who perform these services to be trained and licensed as required by the state.</p>

#### 4.0 MS4 Program Plan Assessment

In accordance with the General Permit, GWMP has evaluated the MS4 Program Plan in FY 2025, including a review of each MCM. The GWMP finds that the BMPs established to implement the MCMs are effective and that no changes are required at this time. If critical staffing gaps continue for the next reporting cycle, GWMP may need to align with staffing capacity and reporting requirements for the MS4 Program Plan and update some of the BMPs for the MCMs.



## 5.0 Special Conditions Associated with TMDLs

The General Permit requires the GWMP to develop action plans to address TMDLs where a wasteload allocation (WLA) has been assigned to the MS4.

The following provides an update on the status of the GWMP’s Chesapeake Bay TMDL compliance activities. The Chesapeake Bay TMDL Action Plan was pending approval as of April 2026 after public comment and submitted to the DEQ. Implementation status of that plan is as follows:

- The Roaches Run Water Sanctuary was a wetland enhancement involving planting native vegetation in the Roaches Run Waterfowl Sanctuary to enhance the function of freshwater wetlands. The wetland enhancement was completed with mixed success. Some larger native shrubs and herbaceous plants survived the second round of planting where they blended in with the existing plant community. Unfortunately, most wetland species died.
- One BMP was improved. During the reporting period the Dyke Marsh Phase 3 work involved replenishing 884 linear feet of sill with additional stone, to off-set elevation changes to improve performance of the dyke system.

The park TMDL plan demonstrates that the park has achieved the 40% reductions for the 2018-2023 permit, and has almost reached the 100% reduction levels needed for the 2023-2028 permit

	<b>Total Nitrogen (lbs/year)</b>	<b>Total Phosphorus (lbs/year)</b>	<b>Total Suspended Solids (lbs/year)</b>
Existing Source Reductions to Meet 40% Target	276	35	29,572
+ New Source Offsets	-	-	-
+ Grandfathered Offsets	-	-	-
= Total Required Reductions and Offsets	276	35	29,572
- BMPs Prior to July 1, 2018 <sup>1</sup>	-	-	-
- BMPs July 1, 2018 and On	473	83	322,575
= Remainder/(Excess) Toward 40% Target	(197)	(48)	(293,003)
Progress Toward 100% Target	68.6%	94.9%	436.3%