



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
c/o Turkey Run Park
McLean, Virginia 22101

IN REPLY REFER TO:
1.A.2 (GWMP)

October 1, 2015

Bryant Thomas
Regional Water Permit and Planning Manager
Virginia Department of Environmental Quality
Northern Regional Office
13901 Crown Court
Woodbridge, VA 22193

Dear Mr. Thomas:

This letter serves as the 2015 MS4 Annual Report for George Washington Memorial Parkway (GWMP) (permit registration number VAR040111).

A. Background Information.

1. Permittee name and permit number: George Washington Memorial Parkway, VAR040111
2. The annual report permit year and reporting period: 2015
3. Modifications to any operator's department's roles and responsibilities: none
4. Number of new MS4 outfalls and associated acreage by HUC added during the permit year: None
5. Signed certification: see enclosure

B. Minimum Control Measure Implementation.

1. MCM1 – Public Education and Outreach
 - a. Items relating to Permit Section II.B.1.g(1)

The park conducted several activities throughout the year:

Activity	Estimated number of people reached
Bridging the Watershed Program	230 students through 10 programs
Advertise for, coordinate and lead volunteer cleanup efforts for streams, riverside and wetland areas throughout the Parkway	Volunteers contributed over 2500 hours of work during riverside cleanup activities and invasive plant removal.

Partner with local environmental groups (Friends of Dyke Marsh)	A new agreement has been put in place with the Friends of Dyke Marsh, which will conduct weekly programs in the spring and summer which will establish estimated numbers for people to be reached in the future.
---	--

GWMP has not established target audience quantities for each high priority issue.

b. Items relating to Permit Section II.B.1.g(2)

The number of people that will be reached for each high priority issue activity to be conducted during the next reporting cycle:

Activity	Estimated number of people reached
Bridging the Watershed Program	170 students
Advertise for, coordinate and lead volunteer cleanup efforts for streams, riverside and wetland areas throughout the Parkway	Over 4000 hours of volunteer hours
Partner with local partner groups (Trust for the George Washington Memorial Parkway)	In addition to our existing relationship with the Friends of Dyke Marsh, the park will work with newly formed groups to maximize outreach to people about the environmental issues throughout the park. Additional outreach includes working with area school districts and county organizations such as Alexandria City, Arlington and Fairfax Counties, and the District of Columbia.

GWMP has not established target audience quantities for each high priority issue.

c. Status of compliance with permit conditions: The park continues to conduct education and outreach efforts through programming, partnerships, and volunteer events in the park.

d. BMP assessment: An assessment of the identified BMPs has determined that they are appropriately addressing the minimum control measures outlined in the MS4 general permit.

e. Progress toward achieving measureable goal identified in the MS4 Program Plan-The park's progress includes maintaining efforts and expanding as funding and capacity allows.

2. MCM2 – Public Involvement/Participation
 - a. Items relating to Permit Section II.B.2.d(1): GWMP has posted the park’s MS4 program plan and annual report on our website at <http://www.nps.gov/gwmp/learn/scienceresearch.htm>. This site also includes our water quality data.
 - b. Items relating to Permit Section II.B.2.d(2): GWMP conducts more than a dozen clean-ups annually in which thousands of trash bags and dozens of tires are collected. Sites that have been cleaned include Belle Haven Park and Dyke Marsh Wildlife Preserve, Roaches Run, Riverside Park, sections of the Potomac Heritage Trail and Mount Vernon Trail which run along the Potomac River, Daingerfield Island, and Jones Point Park.
 - c. Status of compliance with permit conditions: The park meets its public involvement and participation goals through volunteer events held throughout the year.
 - d. BMP assessment: An assessment of the identified BMPs has determined that they are appropriately addressing the minimum control measures outlined in the MS4 general permit.
 - e. Progress toward achieving measureable goal identified in the MS4 Program Plan: The park’s progress includes maintaining efforts and expanding as funding and capacity allows.

3. MCM3 – Illicit Discharge Detection and Elimination
 - a. Items relating to Permit Section II.B.3.f(1): There are no regulated physically interconnected MS4s.
 - b. Items relating to Permit Section II.B.3.f(2): No information at outfalls was collected or analyzed during the reporting period. Water quality tests and monitoring were conducted at Mine Run and Pimmit Run; however, neither water body was specifically tested for the items in the General Permit Registration Statement.
 - c. Items relating to Permit Section II.B.3.f(3)
 - d. Status of compliance with permit conditions: No illicit discharges were identified in the reporting period
 - e. BMP assessment: An assessment of the identified BMPs has determined that they are appropriately addressing the minimum control measures outlined in the MS4 general permit.
 - f. Progress toward achieving measureable goal identified in the MS4 Program Plan: The park is looking to expand its testing at the outfalls to specifically test for items listed in the General Permit Registration starting in the upcoming or following reporting year. Staffing shortages have contributed to challenges over this reporting period.

4. MCM4 – Construction Site Stormwater Runoff Control
 - a. Items relating to Permit Section II.B.4.f(1): There were no regulated land-disturbing activities during this reporting period.

- b. Items relating to Permit Section II.B.4.f(2): There were no regulated land-disturbing activities during this reporting period.
 - c. Items relating to Permit Section II.B.4.f(3): As there were no regulated land-disturbing activities during this reporting period, there were no inspections conducted.
 - d. Items relating to Permit Section II.B.4.f(4): There were no enforcement actions taken the reporting period
 - e. Status of compliance with permit conditions: There were no land-disturbing activities identified during the reporting period.
 - f. BMP assessment: An assessment of the identified BMPs has determined that they are appropriately addressing the minimum control measures outlined in the MS4 general permit.
 - g. Progress toward achieving measureable goal identified in the MS4 Program Plan: No new construction is anticipated for the upcoming reporting period.
5. MCM5 – Post-Construction Stormwater Management
- a. Items relating to Permit Section II.B.5.e: No new storm water management facilities were brought online during the reporting period
 - b. Status of compliance with permit conditions: There was no post-construction activities identified during this reporting period.
 - c. BMP assessment: An assessment of the identified BMPs has determined that they are appropriately addressing the minimum control measures outlined in the MS4 general permit.
 - d. Progress toward achieving measureable goal identified in the MS4 Program Plan: No new construction is anticipated for the upcoming reporting period.
6. MCM6 – Pollution Prevention/Good Housekeeping for Municipal Operations
- a. Items relating to Permit Section II.B.6.g(1): GWMP is working on developing written procedures using an interdisciplinary team approach, and intend to have the final procedures in place by the end of the next reporting year.
 - b. Items relating to Permit Section II.B.6.g(2): Fort Hunt Park will require the development of a Storm Water Pollution Prevention Plan (SWP3) because the area includes a small maintenance facility where materials are stored, including a salt storage facility. The SWP3 is in the very early stages of development and George Washington Memorial Parkway will be working in the upcoming and following reporting year to complete the SWP3 and begin implementation.
 - c. Items relating to Permit Section II.B.6.g(3) : GWMP does not have a nutrient management plan for any sites. GWMP continues to fertilize a total of 21 acres at the rate of 2 pounds of actual nitrogen per year, which equates to a total of 42 pounds of actual nitrogen per year. The sites fertilized are:
 - o Memorial Avenue
 - o Women in Military Service for America Memorial
 - o Arlington House
 - o U.S. Marine Corps Memorial
 - d. Items relating to Permit Section II.B.6.g(4): GWMP held one park-specific training session during the current reporting period. On November 19, 2014,

training was offered to all employees that utilize GWMP's maintenance facility to educate employees about the facility's responsibilities to ensure compliance with its MS4 permit including best practices to reduce pollution in stormwater run-off. Additional training for both maintenance and general parkway staff is planned during the upcoming reporting period.

e. Status of compliance with permit conditions: The park continues to work on improvements to its good housekeeping efforts.

f. BMP assessment: An assessment of the identified BMPs has determined that they are appropriately addressing the minimum control measures outlined in the MS4 general permit.

g. Progress toward achieving measurable goal identified in the MS4 Program Plan: The park has re-established its Environmental Committee and with the recent hiring of a permanent Environmental Protection Specialist who should be in place by the end of the calendar year, progress is anticipated during the upcoming reporting year.

C. Results of information collected and analyzed, including monitoring data, if any, during the reporting period: No information was collected during the reporting period.

D. A summary of the stormwater activities the operator plans to undertake during the next reporting cycle: No new construction is anticipated for the next reporting year.

E. A change in any identified best management practices or measurable goals for any of the minimum control measures including steps to be taken to address any deficiencies: N/A

F. Notice that the operator is relying on another government entity to satisfy some of the state permit obligations (if applicable): N/A

G. The approval status of any programs pursuant to Section II.C of the general permit (if appropriate), or the progress towards achieving full approval of these programs: N/A

H. Information required for any applicable TMDL special condition contained in Section I of the general permit: N/A

The George Washington Memorial Parkway and the new Division of Resources Management is committed to meeting our responsibilities and reporting requirements under the MS4 General Permit. Should you need any additional information, please contact me at 703-289-2512 or at simone_monteleone@nps.gov.

Sincerely,

Simone Monteleone
Chief, Division of Resource Management

George Washington Memorial Parkway

Enclosures

cc: Environmental Protection Specialist, GWMP

Certification Statement and Requirements

As required by 9VAC25-870-370 B, all reports required by state permits, and other information requested by the board shall be signed by a responsible official or by a duly authorized representative of that person. A responsible official is:

- 1. *For a corporation: by a responsible corporate officer. For the purpose of this section, a responsible corporate officer means: (i) a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy-making or decision-making functions for the corporation, or (ii) the manager of one or more manufacturing, production, or operating facilities, provided the manager is authorized to make management decisions that govern the operation of the regulated facility, including having the explicit or implicit duty of making major capital investment recommendations, and initiating and directing other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; the manager can ensure that the necessary systems are established or actions taken to gather complete and accurate information for state permit application requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures;*
- 2. *For a partnership or sole proprietorship: by a general partner or the proprietor, respectively; or*
- 3. *For a municipality, state, federal, or other public agency: by either a principal executive officer or ranking elected official. For purposes of this section, a principal executive officer of a federal agency includes (i) the chief executive officer of the agency, or (ii) a senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency.*

Duly Authorized Representatives

A person is a duly authorized representative only if:

- 1. *The authorization is made in writing by a person described above;*
- 2. *The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company. A duly authorized representative may thus be either a named individual or any individual occupying a named position; and*
- 3. *The written authorization is submitted to the department.*

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.

Responsible Official Signature Date

____ VA040111 _____ George Washington Memorial Parkway _____
 Permit Number MS4 Name