



Maryland

Department of the Environment

Larry Hogan, Governor
Boyd K. Rutherford, Lt. Governor

Ben Crumbles, Secretary
Horacio Tablada, Deputy Secretary

February 12, 2021

Charles Cuvelier
700 George Washington Memorial Parkway
McClean, VA 22101

Dear Mr. Cuvelier:

The Maryland Department of the Environment, Water and Science Administration (Department) has completed a review of George Washington Memorial Parkway's (GWMP) Progress Report under the National Pollutant Discharge Elimination System (NPDES) General Permit No. 13-IM-5500 for Discharges from Small Municipal Separate Storm Sewer Systems (MS4). The report reflects progress made to meet permit conditions during the period July 1, 2019 through June 30, 2020. The Department has determined that the submittal is in compliance with reporting requirements as outlined in the permit.

The progress report provided an update to the impervious acre baseline assessment and indicated that GWMP's target restoration requirement is estimated to be 9.5 acres. GWMP submitted a Restoration Activity Schedule that identified two potential stream restoration projects that may achieve the restoration target. Other noted program accomplishments include progress developing robust public involvement, training, and good housekeeping programs. Results of the Department's review are provided as an attachment to this letter and some of the major comments include:

- Please provide an updated long-term plan to verify best management practice construction completion.
- Please continue to develop the illicit discharge detection and elimination program elements and provide an update on progress towards catching up on outfall screenings.

Please address all comments in the Attachment in the next Progress Report due on October 31, 2021. The Department recognizes the significant effort necessary to implement a stormwater program and commends GWMP for its commitment and progress to date. If you have any questions on this review, please contact me at Deborah.Cappuccitti@Maryland.gov or 410-537-3533, or Nora Howard at Nora.Howard1@Maryland.gov.

Sincerely,

Deborah J. Cappuccitti
Senior Regulatory Compliance Engineer
Water and Science Administration

Attachment

**George Washington Memorial Parkway
Small Municipal Separate Storm Sewer System (MS4) Permit
Maryland Department of the Environment (Department) Review of
Fiscal Year (FY) 2020 MS4 General Permit Progress Report**

Reporting

1. The National Park Service (NPS) George Washington Memorial Parkway (GWMP) submitted a completed Progress Report Form and included a signature for the appropriate responsible personnel and contact information. This information is required to be updated annually.
2. The next Progress Report is due on October 31, 2021 and must include updates to the impervious area restoration program and responses to comments outlined below.
3. Please check the Department's website for available resources related to MS4 program development and guidance for compliance with permit requirements at:
mde.maryland.gov/programs/Water/StormwaterManagementProgram/Pages/NPDES_MS4_New.aspx

Section I: Impervious Area Restoration Reporting

4. GWMP has calculated an impervious area restoration target of 9.5 acres. The Department has accepted the baseline and restoration requirement.
5. GWMP provided an updated Work Plan with the progress report. The Work Plan included strategies and budgeting for developing as-built plans and ensuring long term maintenance and inspection of best management practices (BMP).
6. The Work Plan should be updated and submitted annually to reflect adaptive planning to achieve the restoration requirement.
7. GWMP submitted an acceptable Restoration Activity Schedule (RAS) with the progress report. The schedule included two stream restoration projects which may be used to achieve the restoration requirement.
8. GWMP is not required to receive as-built plan approval from the Department for stream restoration, shoreline management, or any other alternative BMP.
9. The RAS should be updated and submitted annually in Microsoft Excel format.
10. GWMP did not submit an urban BMP database as there are no completed BMPs onsite.
11. GWMP shall continue to update the BMP database as projects are completed and submit this database for review in the next progress report.

Minimum Control Measure (MCM) #1: Public or Personnel Education and Outreach

12. GWMP provided sufficient information to comply with the public or personnel education and outreach permit requirements.
13. GWMP provided training on good housekeeping and stormwater pollution prevention practices to employees and park visitors through online training and website resources. These efforts are planned to continue through the next reporting period.
14. Continued progress shall be submitted to the Department as part of the year 4 Progress Report due on October 31, 2022.

MCM #2: Public or Personnel Involvement and Participation

15. GWMP provided sufficient information to comply with the public or personnel involvement and participation permit requirements.

16. GWMP engaged 1,265 members of the community through volunteer events and notices. Volunteer efforts removed trash and planted 193 trees. GWMP plans to continue trash clean-up, planting, and invasive removal events through the next reporting period.
17. Continued progress shall be submitted to the Department as part of the year 4 Progress Report due on October 31, 2022.

MCM #3: Illicit Discharge Detection and Elimination (IDDE)

18. GWMP provided sufficient information to comply with the IDDE permit requirements.
19. GWMP submitted a map of the MS4 that included outfalls. GWMP should also include in the map stormwater drainages and pipes so that illicit discharges may be tracked through the system. An updated map must be submitted in the FY 2022 Progress Report.
20. GWMP submitted a copy of the policy, NPS 2006 Management Policies, with this Progress Report. The policy is acceptable and meets permit requirements.
21. GWMP submitted standard operating procedures (SOP) for the IDDE program. The procedures included valuable information, however a screening schedule for each outfall, a process for conducting screening that specifies equipment, and detailed information for the methods for tracking, reporting, and investigating and eliminating any suspected discharge must also be included. An updated SOP must be submitted in the FY 2022 progress report.
22. The SOP specifies that 10 outfalls should be screened for dry weather flows per year. GWMP did not screen any outfalls during the reporting period but screened 10 outfalls in September 2020 and plans to screen in summer of 2021. These plans for getting on track with outfall screenings are acceptable to the Department.
23. GWMP maintains inspection records that are available to the Department upon request.
24. GWMP provided adequate details describing maintenance and corrective actions undertaken this reporting period to address erosion, debris buildup, sediment accumulation, or blockage problems.
25. GWMP has 35 staff trained in illicit discharge detection and spill prevention.
26. Continued progress shall be submitted to the Department as part of the year 4 Progress Report due on October 31, 2022.

MCM #4: Construction Site Stormwater Runoff Control

27. GWMP provided sufficient information to comply with this MCM and described an acceptable process for receiving, investigating, and resolving complaints from interested parties related to construction activities.
28. GWMP reported that there were no active construction projects during the reporting period.
29. GWMP maintains records related to construction site stormwater runoff control, which are available to the Department during field review.
30. GWMP reported that no staff are trained in the Department's Responsible Personnel Certification. GWMP should consider using this free online resource as a training opportunity.
31. Continued progress shall be submitted to the Department as part of the year 4 Progress Report due on October 31, 2022.

MCM #5: Post Construction Stormwater Management

32. GWMP provided sufficient information to comply with this MCM.
33. GWMP did not submit any plans or as-built plans to the Department for review or approval during the reporting period.

34. GWMP noted that they are responsible to submit plans prior to implementing BMPs and for ensuring appropriate BMP inspection and maintenance procedures are followed.
35. Continued progress shall be submitted to the Department as part of the year 4 Progress Report due on October 31, 2022.

MCM #6: Pollution Prevention and Good Housekeeping

36. GWMP provided sufficient information to comply with this MCM.
37. GWMP provided 6 trainings to 185 staff on spill response, stormwater pollution, and related topics.
38. GWMP provided the good housekeeping plans and example inspection forms with the progress report. GWMP should verify that these documents are maintained onsite.
39. GWMP does not store de-icers, fertilizers, pesticides or maintain any heavy machinery within parkway property. GWMP has several employees certified in pesticide application and conducted targeted herbicide applications during the reporting period.
40. Continued progress shall be submitted to the Department as part of the year 4 Progress Report due on October 31, 2022.

Financial Information

41. GWMP reported the cost for implementing MS4 programs at this time includes:
 - The cost for implementing the restoration program is anticipated to be approximately \$318,000.
 - The cost for implementing MCMs for the full 5-year term are estimated at:
 - MCM 1 is approximately \$10,300;
 - MCM 2 is approximately \$25,000;
 - MCM 3 is approximately \$6,300;
 - MCM 4 is approximately \$15,600;
 - MCM 5 is approximately \$0; and
 - MCM 6 is approximately \$62,700.