



**MARYLAND DEPARTMENT OF THE ENVIRONMENT
WATER AND SCIENCE ADMINISTRATION**

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
GENERAL PERMIT FOR DISCHARGES FROM
STATE AND FEDERAL SMALL MUNICIPAL SEPARATE STORM SEWER
SYSTEMS**

**GENERAL DISCHARGE PERMIT NO. 13-SF-5501
GENERAL NPDES NO. MDR055501**

Final Determination: April 27, 2018
Effective Date: October 31, 2018
Expiration Date: October 30, 2023

This National Pollutant Discharge Elimination System (NPDES) general permit covers State and federal small municipal separate storm sewer systems (MS4s) in certain portions of the State of Maryland. MS4 owners and operators to be regulated under this general permit must submit a Notice of Intent (NOI) to MDE by October 31, 2018. An NOI serves as notification that the MS4 owner or operator intends to comply with the terms and conditions of this general permit.

APPENDIX D

State and Federal Small MS4 Progress Report

Maryland Department of the Environment (MDE)

**National Pollutant Discharge Elimination System (NPDES)
Small Municipal Separate Storm Sewer Systems (MS4) General Permit**

This Progress Report is required for those State and federal agencies covered under General Discharge Permit No. 13-SF-5501. Progress Reports must be submitted to:

Maryland Department of the Environment, Water and Science Administration
Sediment, Stormwater, and Dam Safety Program
1800 Washington Boulevard, Suite 440, Baltimore, MD 21230-1708
Phone: 410-537-3543 FAX: 410-537-3553
Web Site: www.mde.maryland.gov

Contact Information

Permittee Name:	NPS George Washington Mem Pkwy - Clara Barton Pkwy
Responsible Personnel:	Charles Cuvelier
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Signature of Responsible Personnel

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.

Charles Cuvelier		10/29/2020
Printed Name	Signature	Date

Reporting Period (State Fiscal Year):

July 1, 2019 - June 30, 2020 (2020)

Due Date:

10/31/20

Date of Submission:

10/31/20

Type of Report Submitted:

Impervious Area Restoration Progress Report (Annual):

Six Minimum Control Measures Progress (Years 2 and 4):

Both:

Permittee Information:

Renewal Permittee:

New Permittee:

Compliance with Reporting Requirements

Part VI of the Small MS4 General Discharge Permit (No. 13-SF-5501) specifies the reporting information that must be submitted to MDE to demonstrate compliance with permit conditions. The specific information required in this MS4 Progress Report includes:

1. Annual: Progress toward compliance with impervious area restoration requirements in accordance with Part V of the general permit. All requested information and supporting documentation must be submitted as specified in Section I of the Progress Report.
2. Years 2 and 4: Progress toward compliance with the six minimum control measures in accordance with Part IV of the general permit. All requested information and supporting documentation shall be reported as specified in Section II of the Progress Report. MDE may request more frequent reporting and/or a final report in year 5 if additional information is needed to demonstrate compliance with the permit.

Instructions for Completing Appendix D Reporting Forms

The reporting forms provided in Appendix D allow the user to electronically fill in answers to questions. Users may enter quantifiable information (e.g., number of outfalls inspected) in text boxes. When a more descriptive explanation is requested, the reporting forms will expand as the user types to allow as much information needed to fully answer the question. The permittee must indicate in the forms when attachments are included to provide sufficient information required in the MS4 Progress Report.

Section I: Impervious Area Restoration Reporting Form

Section I: Impervious Area Restoration Reporting

1. a. Was the impervious area baseline assessment submitted in year 1?

Yes No

b. If No, describe the status of completing the required information and provide a date at which all information required by MDE will be submitted:

c. Has the baseline been adjusted since the previous reporting year?

Yes No

2. Complete the information below based on the most recent data:

Total impervious acres of area covered under this permit:

47.59

Total impervious acres treated by stormwater water quality best management practices (BMPs):

0

Total impervious acres treated by BMPs providing partial water quality treatment (multiply acres treated by percent of water quality provided):

0

Total impervious acres treated by nonstructural practices (i.e., rooftop disconnections, non-rooftop disconnections, or vegetated swales):

0

Total impervious acres untreated:

47.59

Twenty percent of this total area (this is the restoration requirement):

9.52

Verify that all impervious area draining to BMPs with missing inspection records is not considered treated. Describe how this information was incorporated into the overall analysis:

There are no BMPs in the park at this time – see Appendix D of the MS4 Program Plan for a summary of the impervious area assessment.

3. Has an Impervious Area Restoration Work Plan been developed and submitted to MDE in accordance with Part V.B, Table 1 of the permit or other format?

Yes No

Has MDE approved the work plan?

Yes No

Section I: Impervious Area Restoration Reporting

If the answer to either question is No, describe the status of submitting (or resubmitting) the work plan to MDE and provide a date at which all outstanding information will be available:

Per comments received from a letter from MDE dated 1/15/2020, the work plan and restoration activity schedule have been updated. The updated work plan is provided in the attached MS4 Program Plan and the Restoration Activity Schedule is attached in an Excel file.

Describe progress made toward restoration planning, design, and construction efforts and describe adaptive management strategies necessary to meet restoration requirements by the end of the permit term:

Compliance evaluation has been completed, and Environmental Assessment and FONSI signed, park is evaluating options for funding to complete construction.

4. Has a Restoration Schedule been completed and submitted to MDE in accordance with Part V.B, Table 2 of the permit?

Yes No

In year 5, has a complete restoration schedule been submitted including a complete list of projects and implementation dates for all BMPs needed to meet the twenty percent restoration requirement?

Yes No

Are the projected implementation years for completion of all BMPs no later than 2025?

Yes No

Describe actions planned to provide a complete list of projects in order to achieve compliance by the end of the permit term:

Proposed project list provided in the restoration activity schedule. The park is working to identify partners and to secure project funding.

Describe the progress of restoration efforts (attach examples and photos of proposed or completed projects when available):

Projects are in planning stage. Photos of stream channels identified for restoration are included in Figure 3 of the Environmental Assessment for the identified projects (<https://parkplanning.nps.gov/projectHome.cfm?projectID=62774>).

5. Has the BMP database been submitted to MDE in Microsoft Excel format in accordance with Appendix B, Tables B.1.a, b, and c?

Yes No

Is the database complete?

Section I: Impervious Area Restoration Reporting

Yes No

If either answer is No, describe efforts underway to complete all data fields, and a date that MDE will receive the required information:

There are no BMPs in the park to report in the database. Per comments received from a letter from MDE dated 1/15/2020, the park is not reporting proposed BMPs.

6. Provide a summary of impervious area restoration activities planned for the next reporting cycle (attach additional information if necessary):

Identify and work with project partners, identify funding sources, continue to evaluate water quality improvement projects.

7. Describe coordination efforts with other agencies regarding the implementation of impervious area restoration activities:

Not applicable.

8. List the total cost of developing and implementing impervious area restoration program during the permit term:

Estimated cost: \$318,000

Section II: Minimum Control Measures Reporting Forms

MCM #1: Personnel Education and Outreach

<p>1. Does the permittee maintain a process and phone number for the public and/or staff to report water quality complaints? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Number of complaints received: <input type="text" value="0"/></p> <p>Describe the actions taken to address the complaints: <i>Not applicable.</i></p>
<p>2. Describe training to employees to reduce pollutants to the MS4: <i>A PowerPoint presentation was prepared addressing identification and response to illicit discharges, good housekeeping, and stormwater pollution prevention practices. The presentation was recorded with audio and distributed to field staff using a YouTube link during the COVID 19 pandemic.</i></p>
<p>3. Describe the target audience(s): <i>Park visitors and employees performing maintenance activities and those that could cause or respond to spills.</i></p>
<p>4. Are examples of educational/training materials attached with this report? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Provide the number and type of educational materials distributed: <i>Educational messages addressing pet waste, illicit discharges, and litter were developed for distribution through the park website. The training materials were distributed as noted in #2.</i></p> <p>Describe how the personnel education program is appropriate for the target audience(s): <i>The training program personnel provides education specific to typical activities and practices to reduce the potential for stormwater pollution.</i></p>
<p>5. Describe how stormwater education materials were distributed to the public and/or staff (e.g., newsletters, website): <i>The training presentation was provided to personnel through a YouTube link.</i></p>
<p>6. Describe how educational programs facilitated efforts to reduce pollutants in stormwater runoff:</p>

MCM #1: Personnel Education and Outreach

<p><i>For the general public, the website education message address sources of pollution (pet waste, illicit discharges, litter) and provides information on NPS programs to address stormwater pollution in the park.</i></p>
<p>7. Provide a summary of activities planned for the next reporting cycle: <i>Continue to maintain educational messages on the park website and provide annual training to field staff.</i></p>
<p>8. List the total cost of implementing this MCM over the permit term: <i>Estimated cost of MCM: \$10,300</i></p>

MCM #2: Public or Personnel Involvement and Participation

1. Describe how the public or personnel involvement and participation program is appropriate for the target audience(s):

The program encourages public engagement and awareness of stormwater issues affecting the park.

2. Quantify and report public and/or staff involvement and participation efforts as shown below where applicable.

Number of participants at public and/or staff events:

Quantity of trash and debris removed at clean up events:

Number of employee volunteers participating in sponsored events:

Number of trees planted:

Length of stream cleaned (feet):

Number of storm drains stenciled:

Number of public notices published to facilitate public and/or staff participation:

Number of public and/or staff meetings organized:

Total number of attendees at all public and/or staff meetings:

Describe the agenda, items discussed, and collaboration efforts with interested parties for public and/or staff meetings:

During all volunteer events, the public is educated on the importance of removing trash and debris, and how that relates to cleaning up the stormwater, how trash can degrade habitats, harm wildlife, and may even endanger people's health. Also, when volunteers see how much trash is on parkland, they are often inspired to reduce their reliance on single-use plastics, and will spread the word to others.

MCM #2: Public or Personnel Involvement and Participation

Describe how public and/or staff comments have been incorporated into the permittee's MS4 program, including water quality improvement projects to address impervious area restoration requirements:

In order to do the stream restoration project, compliance was needed to determine if there would be any significant impacts to the park. An environmental assessment was prepared and written, during that time the public (especially the local community) was heavily involved. The public had two chances to comment on the proposed project, and the park received 10 comments during initial public scoping, and 12 comments when the Environmental Assessment was released. Response to comments can be found here - <https://parkplanning.nps.gov/iccb>.

Describe any additional events and activities if applicable:

N/A

3. Provide a summary of activities planned for the next reporting cycle:

Continued trash clean-ups, plantings, and invasive removals.

4. List the total cost of implementing this MCM for the permit term:

\$25,000

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

1. Does the permittee maintain a map of the MS4 owned or operated by the permittee, including stormwater conveyances, outfalls, stormwater best management practices (BMPs), and waters of the U.S. receiving stormwater discharges?
 Yes No

If Yes, attach the map to this report and provide a progress update on any features that are still being mapped. (If submitting a map would compromise the operational security of an agency, indicate that the map is available for MDE review on site.) If No, detail the current status of map development and provide an estimated date of submission to MDE:
The map is provided in Figure 1 of the Clara Barton Parkway MS4 Program Plan (attached).

2. Does the permittee have a policy, or other agency directive, that prohibits illicit discharges?
 Yes No

If Yes, describe the policy utilized for enforcement by the permittee (alternatively, a link may be provided to the permittee's webpage where this information is available). If No, describe the permittee's plan, including approximate time frame, to establish a policy that prohibits illicit discharges into the storm sewer system:
NPS 2006 Management Policies (Section 9.1.6.2):
https://www.nps.gov/policy/MP_2006.pdf

3. Did the permittee submit to MDE standard operating procedures (SOPs) in accordance with Part IV.C of the permit?
 Yes No

If No, provide a proposed date that SOPs will be submitted to MDE. MDE may require more frequent reports for delays in program development:
SOPs submitted with this Year 2 Progress Report – see Appendix A of the Clara Barton Parkway MS4 Program Plan

Did MDE approve the submitted SOPs?
 Yes No

If No, describe the status of requested SOP revisions and approximate date of resubmission for MDE approval:
MDE has provided no comment on the SOPs to date.

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

4. Describe how the permittee prioritized screening locations in areas of high pollutant potential and identify the areas within which screenings were conducted during this reporting period:

The park identified accessible outfalls to prioritize for screening due to safety considerations.

5. Answers to the following questions must reflect this two-year reporting period.

How many outfalls were identified on the map?

How many outfalls were required to be screened for dry weather flows to meet the minimum numeric requirement based on property size?

How many outfalls were screened for dry weather flows?

Per the permittee's SOP, how frequently were outfalls required to be screened?
10 outfalls per year

At what frequency were outfalls screened during the reporting period? *Due to COVID-19 and staffing shortages, no outfalls were screened. Ten screenings were conducted in September 2020 and the goal is to screen in the summertime, after a week of dry weather.*

How many dry weather flows were observed?

If dry weather flows were observed, how many were determined to be illicit discharges?

Describe the investigation process to track and eliminate each suspected illicit discharge and report the status of resolution:

Inspectors will track the source of the suspected illicit discharge upstream and determine if it is an allowable discharge or a prohibited discharge. If the discharge is prohibited and the source is from within the parkway, the source will be eliminated. If the discharge is prohibited and the source occurs upstream of the parkway, the adjacent MS4 will be notified about the illicit discharge.

6. Describe maintenance or corrective actions undertaken during this reporting period to address erosion, debris buildup, sediment accumulation, or blockage problems:

The parkway is frequently patrolled by NPS maintenance staff to look for debris accumulation on drop inlets (if found they are cleared). For example, while cleaning

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

the cantilever section on the parkway (between Cabin John/River Road on the ramp and Glen Echo turnaround, the park used 3 dump trucks and removed approximately 10 tons of debris (dirt, leaves, trash and weeds).

7. Is the permittee maintaining all IDDE inspection records and are they available to MDE during site inspections?

Yes No

8. If spills, illicit discharges, and illegal dumping occurred during this reporting period, describe the corrective actions taken, including enforcement activities, and indicate the status of resolution:

None reported during the reporting period.

9. Attach to this report specific examples of educational materials distributed to the public and/or staff related to illicit discharge reporting, illegal dumping, and spill prevention. If these are not available, describe plans to develop public and/or staff education materials and submit examples with the next Progress Report:

See the attached training presentation for staff and attached draft public education message for addition to the park website.

10. Specify the number of employees trained in illicit discharge detection and spill prevention:

11. Provide examples of training materials. If not available, describe plans to develop employee training and submit examples with the next Progress Report:

See attached training presentation.

12. List the cost of implementing this MCM during this permit term:

\$6,300

MCM #4: Construction Site Stormwater Runoff Control

1. Does the permittee have a process for receiving, investigating, and resolving complaints from interested parties related to construction activities and erosion and sediment control?

Yes No

Describe the process:

NPS uses its Planning, Environment & Public Comment (PEPC) online system to solicit public comment on park projects. The park will utilize the park's MS4 website to list the primary park point-of-contact who will be tasked with receiving and responding to complaints from interested parties related to land disturbing and construction activities within the park. Park staff will respond to the individual(s) making the complaint within 7 days.

Provide a list of all complaints and a summary of actions taken to resolve them:

No complaints related to construction were received in the reporting period.

2. Total number of active construction projects within the reporting period:

Provide a list of all construction projects and tabulate the total disturbed area:

Not applicable

3. Total number of violation notices issued by MDE related to this MCM on the agency's property:

Describe the status of enforcement activities:

Not applicable

Describe how the permittee communicates and collaborates with MDE to maintain compliance with this MCM for all active construction projects on the agency's property:

See the Clara Barton Parkway MS4 Program Plan for details. Generally, the Clara Barton Parkway conducts limited construction activities. As a National Park, a cultural landscape, in addition to being listed on the National Historic Register, construction on park property is minimal and only conducted when necessary to improve the operations and/or facilities of the park. The park understands, per MD's MS4 permit condition Part IV, D, that construction activity that disturbs 5,000 square feet of land area or 100 cubic yards or more of earth movement must comply with COMAR 26.17.01 and Environment Article, Title 4, Subtitle 1 Annotated Code of Maryland. For any applicable construction project, the park will submit plans to MDE for review and obtain required permits as required by the State of Maryland.

MCM #4: Construction Site Stormwater Runoff Control

Are erosion and sediment control inspection records retained and available to MDE during field review of the agency MS4 program?

Yes No

If No, explain:

Erosion and sediment control are required for any construction project on the parkway, and are listed under the conditions and requirements for every special use permit issued by the park. The park does not have any current ongoing internal projects, all construction projects are from external agencies, permitted and overseen by the park.

4. Number of staff trained in MDE's Responsible Personnel Certification:

0

5. Describe the coordination with other entities regarding implementation of this MCM:
See the response to #3.

6. List the total cost of implementing this MCM over the permit term:
\$15,600

MCM #5: Post Construction Stormwater Management

1. Has an Urban BMP database been submitted in accordance with the database structure in Appendix B, Tables B.1.a, b, and c as a Microsoft Excel file?
 Yes No

Describe the status of the database, efforts to complete all data fields, and provide a date as to when the required information will be submitted to MDE:

There are no BMPs in the park to report in the database. Per comments received from a letter from MDE dated 1/15/2020, the park is not reporting proposed BMPs.

2. Total number of plans submitted to MDE for review and approval:

Total number of as-built plans submitted to MDE:

Number of submitted as-built plans approved by MDE:

3. Total number of BMPs located on each property covered under the general permit (list individual property, and total BMPs for that property – provide separate attachment if necessary):

There are no existing BMPs on the property.

Does the permittee perform inspections for all structural BMPs in accordance with the Dam Inspection Checklist in Maryland Pond Code 378 at least once every three years?

Yes No

If No, describe efforts to train staff and develop a program to perform these required inspections on a triennial basis:

Not applicable at this time – will be implemented upon construction of BMPs.

Are BMP inspection records retained and available to MDE during field review of local programs?

Yes No

4. Provide a summary of routine maintenance activities for all BMPs:

Not applicable at this time – will be implemented upon construction of BMPs.

Are BMP maintenance procedures consistent with maintenance requirements on MDE approved plans?

Yes No

MCM #5: Post Construction Stormwater Management

Are completed BMP maintenance checklists available to MDE during field review of local programs?

Yes No

If either answer is No, describe planned actions to implement maintenance checklists and procedures and provide formal documentation of these activities:

Not applicable at this time – will be implemented upon construction of BMPs.

Describe all problems discovered during routine maintenance operations and repair work performed to restore the function of the BMP(s) (attach photos and additional documentation as needed):

Not applicable at this time

5. Number of staff trained in proper BMP design, performance, inspection, and routine maintenance:

6. Provide a summary of activities planned for the next reporting cycle:
Activities will be planned and implemented if any BMPs are constructed in the next reporting cycle.

7. List the total cost of implementing this MCM over the permit term:
Estimated Cost: \$0

MCM #6: Pollution Prevention and Good Housekeeping

1. Provide a list of topics covered during the last training session related to pollution prevention and good housekeeping, and attach to this report specific examples of training materials:

Pollution Prevention Basics; Pesticides and Herbicides; Fertilizers; Mowing; Material Storage; Spill Response; Illicit Discharge Identification and Response

List all training dates within this two-year reporting period:

- *Spill response + Illicit Discharge - 7/2020; 35 people (YouTube presentation)*
- *What is stormwater runoff / MS4 permit – 9/2020 – 40 people (powerpoint presentation)*
- *PCB awareness – November, 2018 (85 employees)*
- *SWP3 Training – October, 2018 (25 employees)*
- *SPCC Training – October, 2018 (25 employees)*
- *IDDE and Good Housekeeping training – October, 2018 (25 employees)*

Number of staff attended:

2. Are the good housekeeping plan and inspection records at each property retained and available to MDE during field review of the local program? Yes No

If No, explain:

See the Clara Barton Parkway MS4 Program Plan. The Clara Barton Parkway does not store materials such as de-icers, fertilizers, or pesticides or perform maintenance of vehicles or heavy equipment within the parkway property.

Provide details of all discharges, releases, leaks, or spills that occurred in the past reporting period using the following format (attach additional sheets if necessary).

None

Property Name: *N/A*

Date: *N/A*

Describe observations:

N/A

Describe permittee's response:

N/A

3. Quantify and report property management efforts as shown below, where applicable (attach additional sheets if necessary).

Number of miles swept:

MCM #6: Pollution Prevention and Good Housekeeping

Amount of debris collected from sweeping (indicate units):

If roads and streets are swept, describe the strategy the permittee has implemented to maximize efficiency and target high priority areas:

N/A

Number of inlets cleaned:

Amount of debris collected from inlet cleaning (indicate units):

Describe how trash and hazardous waste materials are disposed of at permittee owned and operated property(ies), including debris collected from street sweeping and inlet cleaning:

Trash and hazardous waste are disposed at the George Washington Memorial Parkway Maintenance Complex, which is located in Virginia. This site is covered under a VPDES permit for Discharges of Stormwater Associated with Industrial Activity issued by the Virginia Department of Environmental Quality.

Does the permittee have a current State of Maryland public agency permit to apply pesticides?

Yes No

If No, explain (e.g., contractor applies pesticides):

The National Capital Area Invasive Plant Management Team (NCA IPMT) holds a Pesticide Public Agency Permit (business license)

Does the permittee employ at least one individual certified in pesticide application?

Yes No

If Yes, list name(s):

- *NCA IPMT (used to be NCR EPMT) Business License (#24779)*
- *Alex Voznitza/Applicator (#82894)*
- *Nathan Finney/Applicator (#83430)*
- *Mireya Stirzaker/Applicator (#180743; certificate #27206-95099)*

If the permittee applied pesticides during the reporting year, describe good housekeeping methods (e.g., integrated pest management, alternative materials/techniques):

- *Herbicide was applied according to the label*
- *Herbicide was only applied to target species (in our case non-native invasive plants)*
- *Herbicide formulation and modes of action were selected for each target*

MCM #6: Pollution Prevention and Good Housekeeping

species

- *When applicable, herbicide applications were paired with manual and mechanical control (e.g. cut stump treatments).*
- *Herbicide application was timed and applied to minimize impact to non-target sensitive resources.*
- *Herbicide applications accounted for meteorological factors such as wind speeds, wind direction, and precipitation.*
- *Safety protocols, laws and regulations for storing, mixing, transporting handling spills and disposing of unused herbicide and containers were followed at all times.*

If the permittee applied fertilizer during the reporting year, describe good housekeeping methods (e.g., application methods, chemical storage, native or low maintenance species, training):

No record of fertilizer application on permittee property during the reporting period.

If the permittee applied materials for snow and ice control during the reporting year, describe good housekeeping methods (e.g., pre-treatment, truck calibration and storage, salt domes):

No record of snow/ice control application on permittee property during the reporting period.

Describe good housekeeping BMP alternatives not listed above:

4. If applicable, provide a status update for permittee owned or operated properties regarding coverage under the Maryland General Permit for Stormwater Discharges Associated with Industrial Activity or an individual industrial surface water discharge permit:

Not applicable: no properties require permit coverage.

5. List the total cost of implementing this MCM over the permit term:

Estimated Cost: \$62,700