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 National Capital Parks - East (Suitland Pkwy)
Responsible Personnel:	
Mailing Address:	1900 Anacostia Drive SE
	Washington, DC 20020
Phone Number(s):	
Email address:	
Additional Contact(s):	Michael Commisso
Mailing Address:	1900 Anacostia Drive SE
Phone Number(s):	202-690-5160
Email address:	michael Commisso@nps.gov

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.

Tara D. Morrison	TaraDMorrison	11/7/22
Printed Name	Signature	Date

Reporting Period (State Fiscal Year): July 1, 2021 - June 30, 2022 (2022)

Due Date: 10/31/2021 **Date of Submission:** 11/04/2022

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: 4

   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: 75.55

   Twenty percent of this total area (this is the restoration requirement):
   15.11

   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:

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:

Not applicable

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:

NPS is evaluating options to submit for funding to meet restoration requirements by the end of the permit term. An update on funded projects will be available in FY 2023 (next year). All restoration options will be dependent on funding.

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. Restoration planning has been added to the park's annual work plan. 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 as an attachment.

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

Section I: Impervious Area Restoration Reporting

Is the database complete?
☑ 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:

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

   The park is working to identify restoration activities and to secure project funding.

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

   The parking is working to identify partners for restoration activities.

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

   Contractor Support - $20,000
   Estimated cost - $320,000

Section II: Minimum Control Measures Reporting Forms

MCM #1: Personnel Education and Outreach

1. Does the permittee maintain a process and phone number for the public and/or staff to report water quality complaints?
   ☑ Yes ☐ No

   Number of complaints received: 0

   Describe the actions taken to address the complaints:

   Not applicable

2. Describe training to employees to reduce pollutants to the MS4:

   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 will be distributed to field staff using a YouTube link. Both the educational Power Point and YouTube video will be sent to field staff and presented periodically at all employee meetings.

3. Describe the target audience(s):
   Park Maintenance staff. Park visitors and employees performing maintenance activities and those that could cause or respond to spills.

4. Are examples of educational/training materials attached with this report?
   ☑ Yes ☐ No

   Provide the number and type of educational materials distributed:

   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 #7.

   Describe how the personnel education program is appropriate for the target audience(s):

   The training program provides education specific to typical activities and practices at Suitland Parkway to reduce the potential for stormwater pollution.

5. Describe how stormwater education materials were distributed to the public and/or staff (e.g., newsletters, website):

MCM #1: Personnel Education and Outreach

Education materials will be distributed to park staff via email and presented at all employee meetings. Education materials are distributed to the public via social media and available on the park's website.

The training video will be provided to personnel through a YouTube link and presented at all employee meetings periodically (2-3 times per year).

6. Describe how educational programs facilitated efforts to reduce pollutants in stormwater runoff:

   For the general public, educational messaging address sources of pollution (pet waste, illicit discharges, litter) and provides information on NPS programs to address stormwater pollution in the park.

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

   Continue to maintain educational messages on social media and provide annual training to field staff in November 2022. Additionally, provide refresher information through PowerPoint presentation and YouTube video at staff meetings and via email.

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

   Estimated cost of MCM: $10,300

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 public audience is park visitors that includes both local and non-local members of the public. The objective is to increase the public's awareness and participation in the Suitland Parkway's water quality and pollution prevention efforts, and awareness of stormwater issues affecting the park. Personnel are and will be provided informational and training materials throughout the year as noted above.

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: 0

   Quantity of trash and debris removed at clean up events: 0

   Number of employee volunteers participating in sponsored events: 0

   Number of trees planted: 0

   Length of stream cleaned (feet): 0

   Number of storm drains stenciled: 0

   Number of public notices published to facilitate public and/or staff participation: 0

   Number of public and/or staff meetings organized: 0

   Total number of attendees at all public and/or staff meetings: 0

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

   There were no public or NACE personnel events planned in 2022 due to COVID and staffing shortages. The park is in the process of planning events for 2023. Note: NACE has funded invasive plant treatments on Suitland Parkway conducted by the National Capital Area Invasive Plant Management Team (NCA IPMT) in 2022-2024.

MCM #2: Public or Personnel Involvement and Participation

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 parkway, they are often inspired to reduce their reliance on single-use plastics, and will spread the word to others.

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:

To do stream restoration, compliance is needed to determine if there would be any significant impacts to the park (i.e., natural, cultural, archeological resources or to the human environment). An environmental assessment (or other NEPA) will be prepared and written. During that process, the public (especially the local community) will become involved. The public has opportunities to ask questions, make suggestions, and comment on proposed projects.

Suitland Parkway did not conduct any activity requiring public comment during this reporting cycle.

Describe any additional events and activities if applicable:

Not applicable

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

   Trash clean-up events, tree plantings, and invasive plant removal.

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 the Suitland 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:

   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:

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.

   The park was not able to screen any outfalls during the period. No illicit discharges were reported from the park staff nor from the public.

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

   How many outfalls were identified on the map? See map

   How many outfalls were required to be screened for dry weather flows to meet the minimum numeric requirement based on property size? 0

   How many outfalls were screened for dry weather flows? 0

   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?

   Limited personnel available to conduct required number of screenings.

   How many dry weather flows were observed? 0

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

   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:

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

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

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 inclusion on park social media.

10. Specify the number of employees trained in illicit discharge detection and spill prevention: 0

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.

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

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

   WMATA Project (<1-acre footprint)
   M Bridge Project (<1-acre footprint)

3. Total number of violation notices issued by MDE related to this MCM on the agency's property: 0

   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:

   Generally, the Suitland 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

MCM #4: Construction Site Stormwater Runoff Control

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.

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 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, the park is not reporting proposed BMPs.

2. Total number of plans submitted to MDE for review and approval: 0

   Total number of as-built plans submitted to MDE: 0

   Number of submitted as-built plans approved by MDE: 0

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

   Not applicable
   If No, describe efforts to train staff and develop a program to perform these required inspections on a triennial basis:

   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 any BMPs.

MCM #5: Post Construction Stormwater Management

Are BMP maintenance procedures consistent with maintenance requirements on MDE approved plans?
☐ Yes ☐ No

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 any 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 – will be implemented upon construction of any BMPs.

5. Number of staff trained in proper BMP design, performance, inspection, and routine maintenance: 0

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:

   Training was conducted during November 2020 and next planned training is in November 2022.

   Number of staff attended: 0

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:

   The Suitland Parkway does not store materials such as 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).

   Property Name: NONE Date:

   Describe observations:

   Describe permittee's response:

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

   Number of miles swept: No record

   Amount of debris collected from sweeping (indicate units): No record

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

   Road and streets are swept but no record of these activities is maintained.

MCM #6: Pollution Prevention and Good Housekeeping

Number of inlets cleaned: No record

Amount of debris collected from inlet cleaning (indicate units): No record

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 Maintenance Complex located in the District of Columbia.

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)

• 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 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):

All material applied for snow and ice control are kept under shelter and not stored outdoors to allow for runoff.

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: $150,000