



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): 07/19/2022 and 7/22/2022
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Municipal Stormwater
Site/Facility Name: City of Petersburg
Permittee(s): City of Petersburg
Site/Facility Operator: Darryl Walker
Site/Facility Address: 135 North Union Street
Petersburg, Virginia
Latitude: 37.22982 **Longitude:** -77.40516
County/Parish: Prince George
General Permit #:
Site Specific Permit #: VAR040013
NAICS Code: 236220 **SIC:** 1541
Unique Project #: 3E22WN096A

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- Attachment A: Photo Log
- Attachment B: Boar’s Head Brand Drainage Improvements Plan
- Attachment C: Permit

I. Introduction

On July 19, 2022, an inspection team composed of staff from the U.S. Environmental Protection Agency (EPA) Region III (hereinafter, “EPA Inspection Team”) met with representatives of Virginia Department of Environmental Quality (VA DEQ) to conduct an inspection of three of the City of Petersburg’s Post Construction Stormwater Management (PCSWM) facilities. On July 22, 2022, a separate EPA Inspection Team conducted an inspection of the City’s Municipal Yard. The EPA Inspection Team was conducting an inspection of the City of Petersburg’s Municipal Separate Storm Sewer System (MS4) program to assess its compliance with its Virginia Pollutant Discharge Elimination System (VPDES) Permit No. VAR040013.

A. Inspection Opening Conference

The EPA Inspection Team composed of Peter Gold and Chad Harsh arrived at the site at approximately 9:00 am on July 19th for the PCSWM inspections and met with VA DEQ representatives. On July 22, 2022, an EPA Inspection Team composed of Chuck Schadel and Ingrid Hopkins arrived at the Municipal Yard at 9:00 a.m. for an announced inspection and met with representatives of the City and the Virginia Department of Environmental Quality and were led on the inspection by Richard Harris, Assistant General Manager from the City. The EPA and VA DEQ representatives listed below were at the site for the inspection:

Table 1. EPA and VADEQ Representatives

Name	Date	Agency	E-mail
Peter Gold	July 19, 2022	EPA	Gold.peter@epa.gov
Chad Harsh	July 19, 2022	EPA	Harsh.chad@epa.gov
Chuck Schadel	July 22, 2022	EPA	Schadel.chuck@epa.gov
Ingrid Hopkins	July 22, 2022	EPA	Hopkins.ingrid@epa.gov
David Taylor	July 19, 2022	VA DEQ	David.a.taylor@deq.virginia.gov
Shawn Hill	July 19, 2022	VA DEQ	Shawn.hill@deq.virginia.gov

B. Weather and Precipitation Conditions

National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the dates of the inspection and the days prior are provided in the Table 2 below:

Table 2. Precipitation Data

Station Name	Date	Precipitation Amount (inches) ¹
Hopewell, VA US USC00444101	07/14/2022	0.00
Hopewell, VA US USC00444101	07/15/2022	0.17
Hopewell, VA US USC00444101	07/16/2022	0.08
Hopewell, VA US USC00444101	07/17/2022	0.00
Hopewell, VA US USC00444101	07/18/2022	0.00

¹ Source: NOAA National Climatic Data Center (<http://www.ncdc.noaa.gov/>).

Hopewell, VA US USC00444101	07/19/2022	0.00
Hopewell, VA US USC00444101	07/20/2022	0.00
Hopewell, VA US USC00444101	07/21/2022	1.80
Hopewell, VA US USC00444101	07/22/2022	0.05

C. Summary of the Site/Facility

The City of Petersburg is in Prince George's County Virginia and has a population of approximately 33,000 and an area of approximately 23 square miles.

II.Site/Facility Activity

According to the City's 2019 Annual Report, the City has a total of 466 MS4 outfalls, 29 privately owned PCSWM facilities and 8 publicly owned PCSWM facilities.

III. Observations

The following section summarizes the EPA Inspection Team's observations relative to the inspection. The City of Petersburg MS4 is a VPDES permitted facility and operations were compared with permit requirements.

The camera-generated file names are used to identify each photo in the main narrative of this inspection report. Unused photos are digitally stored and maintained in the inspection file. Photos on July 19, 2022 were taken by Peter Gold. Photos on July 22, 2022 were taken by Chuck Schadel. Unused photos are available upon request.

Stormwater Pollution Prevention Plan General Good Housekeeping Stockpiles

Part I.E.6.c of the permit states that "Within 12 months of the state coverage, the permittee shall identify which of the high-priority facilities gave a high potential of discharging pollutants. The permittee shall maintain and implement a site specific stormwater pollution prevention plan (SWPPP) for each facility identified..."

Public Utilities Yard SWPPP Standard Operating Procedures for General Good Housekeeping Practices (SOP) 3.1 "Keep equipment, stockpiles, chemicals, paints etc. covered."

Observation #1:

The EPA Inspection Team observed a stockpile that appeared to be partially covered. These observations are documented in Photographs P7220171, P722017 and P7220173 of the Photo Log, Attachment A.

Stormwater Pollution Prevention Plan Spills and Leaks

Public Utilities Yard SWPPP SOP 3.2 Spill/Leak Cleanup "Do not leave spill/leak without cleaning it up.....Cover the spill with absorbent material such as kitty litter, saw dust, or absorbent pads.....Sweep up granules and dispose of properly."

Observation #2:

The EPA Inspection Team observed possible evidence of potential leaks that were not cleaned up and other leaks where the absorbent materials remained on the ground. These

observations are documented in Photographs P7220167, P7220168, P7220195 and P7220197 of the Photo Log.

Stormwater Pollution Prevention Inlet Protection

Public Utilities Yard SWPPP SOP 4.4 Parking Lot Maintenance – Erosion and Sediment Control “...Install erosion control devices per the Virginia Erosion and Sediment Control Handbook (VESCH)....”

1992 Virginia Department of Environmental Quality Erosion and Sediment Control Handbook Chapter 3.07 – Storm Drain Inlet Protection III-42 “....cover the inlet opening completely...”

Observation #3:

The EPA Inspection Team observed several inlets in which the inlet protection did not appear to cover the inlet opening completely. These observations are documented in Photographs P7220174, P7220179, P7220180, P7220181 and P7220198 of the Photo Log.

PCSWM Facility Type and Location

Part I.E.5.c.1 of the permit requires the permittee to “Implement an inspection and enforcement program for stormwater management facilities not owned by the permittee (i.e., privately owned) that includes:(b) Adequate long-term operation and maintenance by the owner of the stormwater management facility by requiring the owner to develop and record a maintenance agreement, including an inspection schedule to the extent allowable under state or local law or other legal mechanism:...”

Part I.E.5.d of the permit states “The permittee shall maintain an electronic database or spreadsheet of all known permittee-owned or permittee-operated and privately owned stormwater management facilities that discharge into the MS4....A database shall include the following information as applicable: (1) The stormwater management facility or BMP type; (2) The stormwater management facility or BMPs locations as latitude and longitude; (3) The acres treated by the stormwater management facility or BMP, including total acres, pervious acres, and impervious acres; (4) The date the facility was brought online....”

Observation #4:

The EPA Inspection Team visited the PCSWM facility at the Boars Head Facility. The EPA Inspection Team reviewed the plans labeled “Boar’s Head Brand Drainage Improvements” provided by the City of Petersburg. The location and design of the PCSWM facility in the plan did not appear to match the design or the location of the PCSWM facility encountered at the property. The Drainage Improvement plans are provided as Attachment B. Photographs P7190001 through P7190013 of the Photo Log documents the EPA Inspection Team’s observation.

Observation #5:

The EPA Inspection Team visited the PCSWM facility at Bon Secours Medical Center in Petersburg. Several swales, inlets and outlets appeared at the time of the inspection to have partial blockages from sediment or vegetation. The conditions observed at the time

of inspection for this PCSWM facility are documented in Photographs P7190019, P7190020, P7190021, P7190022, P7190024, P7190027, P7190028 and P7190040 of the Photo Log.

Observation #6:

The EPA Inspection Team was unable to assess the PCSWM facility at Hospital Road due to the vegetative growth within the facility. The conditions observed at the time of inspection for this PCSWM facility are documented in Photographs P7190045 through P7190048 of the Photo Log.

Annual Reporting

Part I.D.1 of the permit states “The permittee shall submit an annual report to the department no later than October 1 of each year in a format as specified by the department. The report shall cover the previous year from July 1 to June 30.”

Observation #7:

The EPA Inspection Team requested the annual reports from the City of Petersburg prior to the inspection. The EPA Inspection Team did not receive an Annual Report for 2020 or 2021 from the City of Petersburg before the inspection. The 2020 and 2021 Annual Reports were certified by the City on August 31, 2022, and submitted to the EPA Inspection Team on August 31, 2022.

IV. Records Review

The Inspection Team reviewed all the documents included as Attachments to this Report and all submitted materials from the City of Petersburg.

V. Closing Conference

There was a closing conference held with the operator where the preliminary observations of the inspection were discussed.