



CITY OF MANASSAS PARK MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PROGRAM INSPECTION REPORT

Remote Interview Date: February 1, 2023

Field Inspection Date: February 16, 2023

Report Date: March 15, 2023

Unique Project Identifier: 3E23WN014A

**U.S. Environmental Protection Agency, Region III
Enforcement and Compliance Assurance Division
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Table 1. Summary of Permit Requirements and Inspection Observations

Program Element	Observations
Overall Program Management	No areas of concern noted.
Illicit Discharge Detection and Elimination (IDDE)	Observation 1. The MS4 map provided by the City does not identify the location of stormwater management facilities owned or operated by the City. Observation 2. The Outfall Table provided by the City does not include the all Permit-required components. Observation 3. The MS4 Program Plan provided by the City does not include copies of written notifications of new physical interconnections given by the permittee to other MS4s. Observation 4. The 2021-2022 Annual Report states that “During the 2021-2022 reporting year, 62 of the City’s outfalls were inspected by City staff.” However, City representatives acknowledged that the number “62” is a typo and stated that the City inspected 53 outfalls during the 2021-2022 reporting year.
Construction Site Stormwater Runoff Control	No areas of concern noted.
Post-Construction Stormwater Management for New Development and Development on Prior Developed Lands	Observation 5: The list of privately-owned/operated and City-owned/operated best management practices (BMPs) provided by the City does not include all Permit-required components.
Pollution Prevention and Good Housekeeping for Facilities Owned or Operated by the Permittee Within the MS4 Service Area	Observation 6: The City did not provide a stormwater pollution prevention plan (SWPPP) for the Blooms Park Maintenance Facility at the time of the Inspection.
TMDL Special Conditions	No areas of concern noted.

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Appendix A: *General VPDES Permit For Discharges of Stormwater From Small Municipal Separate Storm Sewer Systems* (NPDES Permit No. VAR040070, effective November 1, 2018)

Appendix B: Photo Log

Appendix C: Exhibit Log

INTRODUCTION

On February 1 and 16, 2023, EPA Region III representatives and EPA contractors PG Environmental and ERG (hereinafter, EPA Inspection Team) performed a compliance inspection of the City of Manassas Park (hereinafter, “Manassas Park”, “the City”, or “Permittee”) Municipal Separate Storm Sewer System (MS4). The inspection was conducted to assess Manassas Park’s compliance with the requirements of the Commonwealth of Virginia’s *Virginia Pollutant Discharge Elimination System (VPDES) General Permit to Discharge Stormwater from Small Municipal Separate Storm Sewer Systems (MS4s)* (NPDES Permit No. VAR040070; hereinafter, the “Permit”). A copy of the Permit is provided in Appendix A.

The purpose of this inspection was to obtain information to assist EPA Region III in assessing the City of Manassas Park’s compliance with the requirements of the Permit, as well as the implementation status of its MS4 program. The presentation of observations in this report does not constitute a formal compliance determination or notice of violation.

The inspection focused on overall program management and the following Permit components:

- Illicit Discharge Detection and Elimination;
- Construction Site Stormwater Runoff Control;
- Post-Construction Stormwater Management for New Development and Development on Prior Developed Lands;
- Pollution Prevention and Good Housekeeping for Facilities Owned or Operated by the Permittee within the MS4 Service Area; and
- Total Maximum Daily Load (TMDL) Special Conditions

The EPA Inspection Team obtained information through a records review and interviews with City staff. Interviews were conducted remotely and during the onsite portion of the inspection. The following primary representatives participated in the inspection:

City

Representatives: Allan J. Rowley – Engineering Services Manager (Virtual and Field)
Calvin O’Dell – Director of Community Development and Public Works (Virtual)
Donald “Bud” Jenkins – Stormwater Supervisor (Field)
Wayne Martin – Site and Stormwater Supervisor (Field)
Ashley Joaquin – Stormwater Assistant (Field)

EPA

Representatives: Chuck Schadel – EPA Region III (Virtual)
Shane McAleer – EPA Region III (Virtual and Field)
Angela Weisel – EPA Region III (Virtual and Field)

State

Representatives: Anna Tuthill – MS4 Coordinator/Inspector, Virginia Department of Environmental Quality (DEQ) (Virtual and Field)
Mason Harper – MS4 Program Compliance Coordinator, DEQ (Virtual)

EPA

Contractors: Taylor Fontaine – PG Environmental (Virtual and Field)
Tiffany Brackett – PG Environmental (Virtual)
Adira Nair – ERG (Virtual and Field)

OFFSITE INSPECTION PROCESS

On February 1, 2023, the EPA Inspection Team conducted offsite conference call interviews with representatives from the City of Manassas Park's MS4 program. The offsite portion of the inspection focused on overall program management, the four (4) minimum control measures identified above and TMDL Special Conditions, specifically for areas within the jurisdictional boundary of the City's MS4.

FIELD INSPECTION PROCESS

On February 16, 2023, the EPA Inspection Team conducted field inspections at a total of eleven (11) operations subject to MS4 program requirements and oversight: (2) Public Works facilities, (2) maintenance facilities, and (7) best management practices (BMPs) including (4) dry ponds, (1) rain garden, (1) Fire Station public filtering structure, and (1) underground sand filter.

Inspection observations based on both the offsite interviews and the field inspections are documented in the sections below.

FIELD INSPECTION OPENING CONFERENCE

The EPA Inspection Team arrived at the Public Works Main Facility in Manassas Park, VA at 8:00 a.m. (EST) on February 16, 2023, which served as a central meeting place for the field inspections. Taylor Fontaine of PG Environmental displayed his Clean Water Act inspector credential to the Manassas Park representatives at the outset of the field inspection and explained that the purpose of the field inspections was to make observations to complement the offsite inspection of the Manassas Park MS4 program conducted February 1, 2023.

The weather during the field inspection was raining in the late morning with temperatures averaging approximately 62 degrees Fahrenheit. National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the date of the inspection and five (5) days prior are provided in the table below. Note that despite limited

documented precipitation below during the inspection, there was observed heavy rain from approximately 10:30 AM until 12:30 PM.

Table 2. Total Precipitation Preceding and During Inspection

Station Name	Date	Precipitation Amount (inches) ¹
ANNANDALE 1.9 W, VA US US1VAFX0080	February 11, 2023	0.00
ANNANDALE 1.9 W, VA US US1VAFX0080	February 12, 2023	0.00
ANNANDALE 1.9 W, VA US US1VAFX0080	February 13, 2023	1.00
ANNANDALE 1.9 W, VA US US1VAFX0080	February 14, 2023	0.00
ANNANDALE 1.9 W, VA US US1VAFX0080	February 15, 2023	0.00
ANNANDALE 1.9 W, VA US US1VAFX0080	February 16, 2023	0.03

CITY OF MANASSAS PARK BACKGROUND

The City of Manassas Park is an incorporated municipality situated about five miles southwest of Centreville along Route 28. The MS4 program is primarily administered and implemented by the Public Works Division (PWD) of the Department of Community Development with assistance from various departments including the Parks, & Recreation Department, Police Department, and Fire Department. The Department of Community Development serves as the coordinating body for the City's MS4 Program, and The Director of Public Works and Community Development is responsible for overseeing the program's administration, including annual reporting and development and implementation of the program. The City Manager is responsible for certifying the relevant documents. The City contracts with Bowman Consulting Group Ltd. for assistance with MS4 program plan review services and erosion and sediment control site plan reviews. Additionally, the City uses ECS Corporate Services, LLC for illicit discharge detection and elimination (IDDE) assistance including outfall sampling and illicit discharge detection. The PWD staff explained that the Manassas Park MS4 program is primarily funded by the City's stormwater enterprise fund. Additionally, the program is also supported by a stormwater utility fee that was enacted around 2012.

The day-to-day operations of the MS4 program occur under PWD's supervision, and the PWD is comprised of three employees that conduct public and private BMP and outfall inspections.

Manassas Park's MS4 covers approximately 2.6 square miles and serves roughly 14,273 people. The City's MS4 has several identified interconnections with the City of Manassas. The primary receiving waterbody for the MS4 is Bull Run Creek and associated tributaries.

The Manassas Park City Schools, Signal Hill Park, and Blooms Park all fall under the City of Manassas Park's MS4 permit, with shared responsibilities that are detailed in both the MS4 Program Plan (refer to Appendix C, Exhibit 1) and its associated 2021-2022 Annual Report (refer to Appendix C, Exhibit 2).

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

According to PWD representatives, the City was authorized to discharge under the VPDES Permit on November 1, 2018, until its expiration on October 31, 2023. The City developed a MS4 Program Plan, written November 2018, and revised September 27, 2020 (refer to Appendix C, Exhibit 1).

INFORMATION OBTAINED RELATIVE TO PERMIT REQUIREMENTS

The EPA Inspection Team obtained documentation and other supporting information to evaluate compliance with the Permit prior to, during, and after the remote interview and field inspections. Observations regarding the City's implementation of Permit requirements are presented in this report.

On January 12, 2023, the EPA Inspection Team provided the Permittee with a records request that listed documents to be available for review during the inspection, with certain items to be provided prior to the inspection. The City made numerous documents available electronically to the EPA Inspection Team utilizing a shared folder on January 26, 2023, and February 2, 2023. The EPA Inspection Team reviewed the documentation and other supporting evidence provided by the City regarding compliance with the Permit. Referenced documentation used as supporting information is provided in Appendix C, Exhibit Log.

On February 22, 2023, after the field inspections, the EPA Inspection Team emailed the Permittee an additional list of requested documents. These documents were provided on February 24, 2023.

The following sections of this report describe the City's approach to implementing minimum control measures, the relevant Permit requirements, and observations made during the inspection process.

MINIMUM CONTROL MEASURE 3: ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE)

The City's PWD of the Department of Community Development administers the City's IDDE program with assistance from the Department of Parks and Recreation, the Police Department, and the Fire Department. The Director of Community Development administers the MS4 Program and responsibilities include annual reporting requirements, program development and implementation. The City relies on contractors Bowman Consulting Group Ltd. for assistance with MS4 program plan review services and erosion and sediment control site plan reviews. Additionally, the City uses ECS Corporate Services, LLC for IDDE assistance, including outfall sampling and illicit discharge detection.

According to the City's 2021-2022 Annual Report, the City has approximately 92 MS4 outfalls within its regulated boundary (refer to Appendix C, Exhibit 2).

City Code 8-57 et seq. prohibits illicit discharges into the City's MS4. The City's MS4 Stormwater Management Standard Operating Procedures Handbook outlines standard operating procedures (SOPs) to detect, identify, and address unauthorized non-stormwater discharges (refer to Appendix C, Exhibit 3). Citizens can report illicit discharges through the City website (a form from the website is included in this package); the City's website also has a 24-hour phone

number for the City Fire Marshall for illicit or large discharges. These instances are then forwarded to the PWD who will investigate.

The City's PWD conducts dry weather screenings on an ongoing basis. City representatives stated that 53 City-identified outfalls were screened during dry weather conditions during the 2021-2022 reporting period.

Permit Part E.3.a states "The permittee shall develop and maintain an accurate MS4 map and information table as follows:

- (1) A map of the storm sewer system owned or operated by the permittee within the census urbanized area identified by the 2010 decennial census that includes, at a minimum:
 - (a) MS4 outfalls discharging to surface waters, except as follows:
 - i. In cases where the outfall is located outside of the MS4 permittee's legal responsibility, the permittee may elect to map the known point of discharge location closest to the actual outfall; and
 - ii. In cases where the MS4 outfall discharges to receiving water channelized underground, the permittee may elect to map the point downstream at which the receiving water emerges above ground as an outfall discharge location. If there are multiple outfalls discharging to an underground channelized receiving water, the map shall identify that an outfall discharge location represents more than one outfall. This is an option a permittee may choose to use and recognizes the difficulties in accessing outfalls to underground channelized stream conveyances for purposes of mapping, screening, or monitoring.
 - (b) A unique identifier for each mapped item required in Part I E 3;
 - (c) The name and location of receiving waters to which the MS4 outfall or point of discharge discharges;
 - (d) MS4 regulated service area; and
 - (e) stormwater management facilities owned or operated by the permittee."

Observation 1: The MS4 map provided by the City did not contain all Permit-required information. In response to the records request, the City provided the EPA Inspection Team with a copy of the City's MS4 map, dated 2022. However, the provided map does not identify the location of stormwater management facilities owned or operated by the City.

Permit Part E.3.a(2) states "The permittee shall maintain an information table associated with the storm sewer system map that includes the following information for each outfall or point of discharge for those cases in which the permittee elects to map the known point of discharge in accordance with Part I E 3 a (1) (a):

- (a) A unique identifier as specified on the storm sewer system map;
- (b) The latitude and longitude of the outfall or point of discharge;
- (c) The estimated regulated acreage draining to the outfall or point of discharge;
- (d) The name of the receiving water;
- (e) The 6th Order Hydrologic Unit Code of the receiving water;

- (f) An indication as to whether the receiving water is listed as impaired in the Virginia 2016 305(b)/303(d) Water Quality Assessment Integrated Report;
- (g) The predominant land use for each outfall discharging to an impaired water; and
- (h) The name of any EPA approved TMDLs for which the permittee is assigned a wasteload allocation.”

Observation 2: The information table for the City’s storm sewer system map did not contain all Permit-required information. In response to the records request, the City provided the EPA Inspection Team with a copy of the City’s Outfall Table. The table includes an ID for each listed outfall, latitude/longitude, and primary land use. However, the provided Outfall Table does not include the following Permit-required components:

- The estimated regulated acreage draining to the outfall or point of discharge;
- The name of the receiving water;
- The 6th Order Hydrologic Unit Code of the receiving water;
- An indication as to whether the receiving water is listed as impaired in the Virginia 2016 305(b)/303(d) Water Quality Assessment Integrated Report; and
- The name of any EPA approved TMDLs for which the permittee is assigned a wasteload allocation.

At the time of the inspection, the City indicated that it was updating their mapping to a geographic information system (GIS) to include all Permit-required components.

Further, as stated earlier under the IDDE section of this report, according to the City’s 2021-2022 Annual Report, the City has approximately 92 MS4 outfalls within its regulated boundary (refer to [Appendix C, Exhibit 2](#)). However, the provided Standard Operating Procedures Handbook (dated April 15, 2021) states there are “84 known outfalls” (refer to [Appendix C, Exhibit 3](#)).

Permit Part E.3.d states “The MS4 program plan shall include:

- (1) The MS4 map and information table required by Part I E 3 a. The map and information table may be incorporated into the MS4 program plan by reference. The map shall be made available to the department within 14 days upon request;
- (2) Copies of written notifications of new physical interconnections given by the permittee to other MS4s; and
- (3) The IDDE procedures described in Part I E 3 c.”

Observation 3: The City provided the EPA Inspection Team with a copy of their MS4 Program Plan (refer to [Appendix C, Exhibit 1](#)); however, the provided MS4 Program Plan does not include copies of written notifications of new physical interconnections given by the permittee to other MS4s.

Permit Part E.3.e states “The annual report shall include:

- (1) A confirmation statement that the MS4 map and information table have been updated to reflect any changes to the MS4 occurring on or before June 30 of the reporting year;
- (2) The total number of outfalls screened during the reporting period as part of the dry weather screening program;”

Observation 4: The 2021-2022 Annual Report states that “During the 2021-2022 reporting year, 62 of the City’s outfalls were inspected by City staff.” However, the City representative acknowledged that the number “62” was a typo and stated that the City inspected 53 outfalls during the 2021-2022 reporting year.

MINIMUM CONTROL MEASURE 4: CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

The City’s Department of Community Development administers the Construction Site Stormwater Runoff Control MCM. According to City’s MS4 Program Plan, the City utilizes Chapter 8, Article II of the City Code, which includes the Erosion and Sediment Control Ordinance, to enforce this MCM. The City’s 2021-2022 Annual Report states “The City requires that land disturbance not begin until erosion and sediment control plan or an agreement in lieu of a plan is approved by the City...

The City of Manassas Park requires all land-disturbing activities encompassing areas greater than or equal to one acre to secure a VSMP stormwater permit, through the City’s VSMP Program, for the activity.” This is enforced by Chapter 8, Article II of the City Code.”

City representatives stated that staff from the Community Planning & Building Department conduct erosion and sediment control inspections at active construction sites at least every 2 weeks or within 48 hours of a runoff producing storm event. It was not explained during the inspection how much rain (in inches) would qualify as a runoff producing storm event.

City representatives provided the EPA Inspection Team with an example E&S/SWPPP Inspection Report as well as a list of active City construction sites (as of 2022) (refer to Appendix C, Exhibit 4 and 5 respectively).

MINIMUM CONTROL MEASURE 5: POST-CONSTRUCTION STORMWATER MANAGEMENT FOR NEW DEVELOPMENT AND DEVELOPMENT ON PRIOR DEVELOPED LANDS

The City’s PWD administers the City’s post-construction program. According to the 2021-2022 Annual Report, the City has 10 privately-owned BMPs and 42 City-owned BMPs (52 total). The City utilizes the following documents as guidelines for their post-construction maintenance procedures for facilities/BMPs owned/operated by the City:

- Public Facilities Manual
- Virginia Stormwater Management Handbook
- State Water Control Board; Virginia Stormwater Management Program (VSMP) Regulation; Chapter 870
- Chapter 8, Article III of the City Code describes the Stormwater Management Ordinance

- Department of Environmental Quality Guidance Documents
 - Virginia Runoff Reduction Method (VRRM) Spreadsheets
 - VSMP Technical Bulletins

The City has developed an inspection and maintenance program for the City-owned BMPs where the BMPs are maintained by the PWD at least quarterly and inspected annually. As part of the records request, the City provided the EPA Inspection Team with a copy of their Stormwater Post Construction Inspection Manual, which includes inspection procedures for privately-owned/operated and City-owned/operated BMPs (refer to [Appendix C, Exhibit 6](#)).

City representatives stated that when private BMPs are installed, the City requires the developer to submit a maintenance agreement that gets transferred with the deed of ownership. The City's 2021-2022 Annual Report states "Private BMPs will be maintained in accordance with approved site plans and a completed Stormwater BMP Maintenance and Monitoring Agreement" (refer to [Appendix C, Exhibit 2](#)). City representatives stated that the Stormwater BMP Maintenance and Monitoring Agreements need to include an inspection schedule. City representatives stated that owners of private BMPs are supposed to provide certification of inspection annually and explained that City personnel have the ability to access private property and conduct maintenance activities at the owner's expense.

Permit Part E.5.d states that "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. The database shall also include all BMPs implemented by the permittee to meet the Chesapeake Bay TMDL load reduction as required in Part II A. A database shall include the following information as applicable:

- (1) The stormwater management facility or BMP type;
- (2) The stormwater management facility or BMPs location 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 (MM/YYYY). If the date brought online is not known, the permittee shall use June 30, 2005;
- (5) The 6th Order Hydrologic Unit Code in which the stormwater management facility is located;
- (6) Whether the stormwater management facility or BMP is owned or operated by the permittee or privately owned;
- (7) Whether or not the stormwater management facility or BMP is part of the permittees Chesapeake Bay TMDL action plan required in Part II A or local TMDL action plan required in Part II B, or both;
- (8) If the stormwater management facility or BMP is privately owned, whether a maintenance agreement exists; and
- (9) The date of the permittee's most recent inspection of the stormwater management facility or BMP."

Observation 5: City representatives provided the EPA Inspection Team with a list of the City's privately-owned/operated and City-owned/operated BMPs. However,

this list does not include the following Permit-required components for any of the BMPs.

- The date the facility was brought online;
- The 6th Order Hydrologic Unit Code in which the stormwater management facility is located;
- Whether or not the stormwater management facility or BMP is part of the permittees Chesapeake Bay TMDL action plan required in Part II A or local TMDL action plan required in Part II B, or both;
- If the stormwater management facility or BMP is privately owned, whether a maintenance agreement exists; and
- The date of the permittee's most recent inspection of the stormwater management facility or BMP.

Further, according to the 2021-2022 Annual Report, 10 privately-owned BMPs and 42 City-owned BMPs (52 total) are located within the City's MS4 area. However, the BMP list provided by the City identifies ten (10) privately-owned BMPs and twenty-one (21) City-owned BMPs.

MINIMUM CONTROL MEASURE 6: POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR FACILITIES OWNED OR OPERATED BY THE PERMITTEE WITHIN THE MS4 SERVICE AREA

The City's PWD administers the City's Pollution Prevention and Good Housekeeping (PPGH) program. The City identified six (6) high priority facilities: Public Works Main Facility; Public Works Facility – Rugby Road; Manassas Park City Schools' Maintenance Facility; Storage Facility at Signal Hill Park; Community Center; and Blooms Park Maintenance Building. The City has developed a site-specific stormwater pollution prevention plan (SWPPP) for all high priority facilities except the Blooms Park Maintenance Building. The SWPPPs are electronically available to City personnel and were provided to the EPA Inspection Team. The City's policies and procedures are located in the MS4 Program Plan.

The City has developed and implemented turf and landscape nutrient management plans for: Baker Street Park; Signal Hill Park; Costello Park; and the middle/high school campus athletic fields. The turf and landscape nutrient management plans include all Permit-required information.

Permit Part E.6.e states that "No later than June 30 of each year, the permittee shall annually review any high-priority facility owned or operated by the permittee for which a SWPPP has not been developed to determine if the facility has a high potential to discharge pollutants as described in Part I E 6. c. If the facility is determined to be a high-priority facility with a high potential to discharge pollutants, the permittee shall develop a SWPPP meeting the requirements of Part I E 6 d no later than December 31 of that same year."

Observation 6: City representatives provided the EPA Inspection Team with copies of the SWPPPs for all identified high priority facilities except for the Blooms Park Maintenance Building. During the field inspection, City representatives stated the City acquired the property "about 2 years ago." However, the City had not

provided a SWPPP for this facility at the time of the inspection. City representatives said their plan was to have one implemented by June 2023.

TMDL SPECIAL CONDITIONS

The City developed a TMDL Action Plan, dated May 24, 2018, regarding the Chesapeake Bay TMDL for nitrogen, phosphorus, and sediment. The City also developed an updated TMDL Action Plan for Bull Run Watershed Bacteria TMDL, dated August 16, 2021.

At the time of the inspection, the City indicated that it had plans for a stream restoration project and several wet pond construction projects, though these projects are not likely to be implemented in the current Permit term. At the time of the inspection, the City indicated that it was purchasing nutrient credits from the Upper Occoquan Service Authority (UOSA) to meet the reduction requirements.

FIELD OBSERVATIONS

***Note** – The inspectors from PG and ERG separately inspected the first seven (7) site locations in two teams, each team with representatives from the City.

MINIMUM CONTROL MEASURE 5: POST-CONSTRUCTION STORMWATER MANAGEMENT FOR NEW DEVELOPMENT AND DEVELOPMENT ON PRIOR DEVELOPED LANDS (FIELD INSPECTIONS)

Blooms Crossing Section 3 Ph III – Dry Pond

Address/Location: 38.765925°, -77.422748°

Relevant Minimum Control Measure (MCM): Post Construction

Entry Time: 11:04 AM (EST) February 16, 2023

Exit Time: 11:22 AM (EST)

Description: The Blooms Crossing Section 3 Ph III – Dry Pond receives stormwater from the adjacent streets: Laurie Court, Cynthia Street, and Karen Court. Stormwater collects in the pond and infiltrates. The pond is designed to overflow excess stormwater into an adjacent separate dry pond. Stormwater from the second dry pond discharges into an adjacent unnamed stream to the east.

Conditions: The EPA Inspection Team made the following observation at the Blooms Crossing Section 3 Ph III – Dry Pond.

- 1) The BMP, which is owned/operated by the City, did not appear to need maintenance (refer to Appendix B, Photographs 1 and 2).
- 2) The BMP appeared to be located and configured as designed.

Blooms Crossings D Ph III – Dry Pond

Address/Location: 38.770545°, -77.433273°

Unique Project Identifier: 3E23WN014A

Remote Interview Date: February 1, 2023
Field Inspection Date: February 16, 2023

Relevant Minimum Control Measure (MCM): Post Construction

Entry Time: 11:30 AM (EST) February 16, 2023

Exit Time: 11:50 AM (EST)

Description: The Blooms Crossings D Ph III – Dry Pond, which is owned/operated by the City, receives stormwater from the adjacent streets: Fairway Court and Eagle Court. Stormwater collects in the pond and infiltrates. The pond is designed to overflow excess stormwater into an adjacent stream to the east (refer to [Appendix B, Photographs 3 and 4](#)).

Conditions: The EPA Inspection Team made the following observation at the Blooms Crossings D Ph III – Dry Pond.

- 1) The EPA Inspection Team observed logs and debris blocking the inlet to the concrete riser, reducing the flow from the pond, and causing high water levels (refer to [Appendix B, Photographs 3 and 4](#)). Facility representatives stated they were aware of the problem and were working on getting a contractor to fix the skimmer for the pond and remove the debris.
- 2) The BMP appeared to be located and configured as designed.

Cougar Elementary – Dry Pond

Address/Location: 9330 Brandon St, Manassas Park, VA 20111

Relevant Minimum Control Measure (MCM): Post Construction

Entry Time: 11:54 AM (EST) February 16, 2023

Exit Time: 11:59 AM (EST)

Description: The Cougar Elementary Dry Pond, which is owned/operated by the City, receives stormwater from the adjacent Cougar Elementary School parking lots, Luke Drive, Matthew Drive, and Elizabeth Court.

Conditions: The EPA Inspection Team made the following observation at the Cougar Elementary – Dry Pond.

- 1) The BMP appeared to be located and configured as designed; however there was observed trash in the pond (refer to [Appendix B, Photograph 5](#)).

Fire Station – Public Filtering BMP

Address/Location: 9080 Manassas Dr, Manassas Park, VA 20111

Relevant Minimum Control Measure (MCM): Post Construction

Entry Time: 12:05 PM (EST) February 16, 2023

Exit Time: 12:28 PM (EST)

Description: The Fire Station Public Filtering BMP is a Downstream Defender, which is a vortex filter that captures sediment, oil, and trash from stormwater runoff from the fire station (refer to [Appendix B, Photograph 6](#)). The stormwater from this BMP connects to the inlet on the road next to the fire station which eventually flows into a tributary. The floor drains in the Fire

Station drain into a separate underground oil-water separator (OWS), which is maintained annually.

Conditions: The EPA Inspection Team made the following observations at the Fire Station – Public Filtering BMP.

- 1) At the inspection, the PWD representatives stated the Downstream Defender was cleaned around 2 years ago and was done by the Facility personnel, but generally a third-party contractor, A&M septic conducts the cleaning of the OWS. Clean out records were provided after the inspection on April 13, 2023 and indicated that the OWS was cleaned out by A&M septic on August 5, 2022. The PWD representatives also stated that no record for cleanout of the Downstream Defender is kept.
- 2) The PWD representatives stated annual inspections are conducted on this BMP using a standard inspection form. A copy of this form was not requested during the inspection.
- 3) The BMP appeared to be in place as designed.

Sheetz Gas Station – Private Underground Sand Filter

Address/Location: 8504 Centreville Rd, Manassas Park, VA 20111

Relevant Minimum Control Measure (MCM): Post Construction

Entry Time: 12:35 PM (EST) February 16, 2023

Exit Time: 12:42 PM (EST)

Description: This BMP is an underground sand filter owned by the Sheetz Gas Station (hereinafter, referred to as Sheetz). This BMP receives the stormwater collected in the Sheetz parking lot stormwater inlets. Sheetz is responsible for cleaning the sand filter biannually. The City does an inspection of the BMP every five years.

Conditions: The EPA Inspection Team made the following observations at the Sheetz Underground Sand Filter.

- 1) The PWD representatives stated the City is encountering difficulty accessing the Sheetz maintenance logs for this BMP. Specifically, Sheetz has not been cooperative in providing the maintenance logs to the City.
- 2) The EPA Inspection Team observed both the curb inlet and manhole leading to the sand filter was filled with debris (refer to [Appendix B, Photographs 7 and 8](#)).
- 3) The BMP appeared to be located and configured as designed.

Costello Park Rain Garden #2

Address/Location: 99 Adams St, Manassas Park, VA 20111

Relevant Minimum Control Measure (MCM): Post Construction

Entry Time: 12:49 PM (EST) February 16, 2023

Exit Time: 12:58 PM (EST)

Description: Costello Park Rain Garden #2 (hereinafter, referred to as Rain Garden) is a City-owned BMP that is one (1) of the six (6) Costello Park Rain Gardens. The inspected Rain Garden captures any of the excess stormwater runoff not captured by the other drains in the Community

Center parking lot through sheet flow into one of the two (2) rain garden inlets. The drains in the parking lot are not connected to this Rain Garden and the only flow in the Rain Garden is through one of its two (2) inlets. The Rain Garden does not contain any underground structures, and it functions through infiltration for drainage. The City inspects this BMP annually.

Conditions: The EPA Inspection Team made the following observations at the Costello Park Rain Garden #2.

- 1) It was raining at the time of the inspection, and the EPA Inspection Team observed one of the Rain Garden inlets was blocked by debris, preventing water from flowing into the Rain Garden as intended (refer to [Appendix B, Photograph 9](#)). However, The BMP appeared to be located and configured as designed.
- 2) The PWD representatives stated that they have not conducted any maintenance on this structure and are currently working with the Parks and Recreation Department to develop a maintenance plan for the vegetation in the Rain Garden.
- 3) The EPA Inspection Team observed a drain next to the Rain Garden that acts as an overflow structure (refer to [Appendix B, Photograph 10](#)); the PWD representatives stated they have not experienced any overflow in the Rain Garden since it was built.
- 4) The EPA Inspection Team observed a petroleum sheen flowing into one of the Rain Garden inlets (refer to [Appendix B, Photograph 11](#)).

Mosby Ridge #2 – Private Dry Pond

Address/Location: 38.776514°, -77.465598°

Relevant Minimum Control Measure (MCM): Post Construction

Entry Time: 12:15 PM (EST) February 16, 2023

Exit Time: 12:30 PM (EST)

Description: The Mosby Ridge #2 – Private Dry Pond receives stormwater from the adjacent Mosby Ridge apartment complex parking lots and Kirby Street. Stormwater collects in the pond and infiltrates. The pond is designed to overflow excess stormwater into an adjacent unnamed stream to the east.

Conditions: The EPA Inspection Team made the following observations at the Mosby Ridge #2 – Private Dry Pond.

- 1) City representatives stated that the neighborhood cuts the grass around the BMP, while the City inspects and conducts other maintenance of the BMP itself.
- 2) The EPA Inspection Team observed trash and debris inside the pond (refer to [Appendix B, Photograph 12](#)).
- 3) The EPA Inspection Team observed the BMP concrete riser structure and outfall into an adjacent unnamed stream (refer to [Appendix B, Photographs 13 and 14](#)).
- 4) The BMP appeared to be located and configured as designed.

MINIMUM CONTROL MEASURE 6: POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR FACILITIES OWNED OR OPERATED BY THE PERMITTEE WITHIN THE MS4 SERVICE AREA (FIELD INSPECTIONS)

Public Works Main Facility

Address/Location: 331 Manassas Drive, Manassas Park, VA 20111

Relevant Minimum Control Measure (MCM): PPGH

Entry Time: 8:20 AM (EST) February 16, 2023

Exit Time: 9:10 AM (EST)

Description: The Manassas Park Public Works Main Facility (hereinafter, Public Works Facility or Facility) is the main City PWD facility and is used to store and conduct maintenance on municipal vehicles as well as house the City's salt storage. According to Facility representatives, the Facility does not conduct any fueling activities onsite. The Public Works Facility also has offices for PWD personnel.

The stormwater from the western portion of the Facility flows to the adjacent Flat Branch. Additionally, the floor drains in the main garage drain into an underground oil-water separator (OWS) that is connected to the City's sanitary sewer system. The OWS is cleaned on an as needed basis. A third-party contractor, Crystal Clean, is responsible for collecting oil and debris which collects in the OWS, according to the Facility representatives. No clean out records were provided at the time of the inspection but were requested after the inspection on April 13, 2023.

Conditions: The EPA Inspection Team made the following observations at the Public Works Facility.

- 1) The EPA Inspection Team observed debris and leaves migrating from the Facility, past the boundary fence, and towards the adjacent Flat Branch (refer to Appendix B, Photograph 15).
- 2) The EPA Inspection Team observed an uncovered trash can next to the stream (refer to Appendix B, Photograph 16).
- 3) The EPA Inspection team observed an inlet that, according to Facility representatives, discharges into the adjacent Flat Branch (refer to Appendix B, Photograph 17). The EPA Inspection Team did not observe the outlet connection between the inlet and the stream.
- 4) The Facility representatives stated that street sweeping is conducted around the Facility as needed and that trash is collected in a small roll-off dumpster and taken offsite to a landfill.
- 5) The EPA Inspection Team observed the immediate area around the salt storage building drains to an underground containment structure with baffles to capture solids (refer to Appendix B, Photograph 18). Facility representatives stated that a third-party contractor conducts the maintenance of this structure.
- 6) Facility representatives mentioned the opening of the salt storage structure is covered with a tarp when not in use (refer to Appendix B, Photograph 19).
- 7) The EPA Inspection Team observed several oil stains on the floor of the main vehicle maintenance garage. (refer to Appendix B, Photographs 20 and 21).

- 8) Hydraulic oil was being stored on top of spill pallets (refer to Appendix B, Photograph 22).
- 9) The EPA Inspection Team observed a floor drain in the maintenance and storage garage that connects to an oil-water separator and then the City's sanitary sewer system (refer to Appendix B, Photograph 23). No building plans were provided at the time of the inspection to confirm this but were requested after the inspection on April 13, 2023.
- 10) The Facility uses a 500-gallon tank to store used oil, which is not double-walled, but is located within cinderblock secondary containment with roof cover. The EPA Inspection Team observed oil staining outside of the secondary containment area (refer to Appendix B, Photographs 24 and 25).
- 11) The City provided a copy of the SWPPP for the Facility, dated June 21, 2017.

Public Works Rugby Road Facility

Address/Location: 9001 Rugby Road, Manassas Park 20111

Relevant Minimum Control Measure (MCM): PPGH

Entry Time: 9:25 AM (EST) February 16, 2023

Exit Time: 9:40 AM (EST)

Description: The Public Works Rugby Road Facility (hereinafter, Rugby Road Facility or Facility) stores gravel, asphalt, bricks, stones, tree branches, and other aggregate materials. Facility representatives stated that a roll-off dumpster then collects all the trash and unusable debris and disposes of the materials at a local landfill.

The stormwater from the southern portion of the Facility drains to an unnamed creek located to the south of the Facility. The Facility is enclosed by a fence, and there is also a super silt fence along the boundary of the Facility to prevent sediment and debris from leaving the site.

Conditions: The EPA Inspection Team made the following observations at the Rugby Road Facility.

- 1) The EPA Inspection Team observed stored aggregate materials (e.g., gravel, asphalt pitch) (refer to Appendix B, Photographs 26 and 27).
- 2) The EPA Inspection Team observed that, at the time of the inspection, the silt fence surrounding the Facility appeared to need repair (e.g., holes and gaps in the fencing) (refer to Appendix B, Photographs 28 and 29).
- 3) The Facility representatives stated that PWD staff inspect the Facility quarterly and maintenance is done on an as-needed basis, mostly on the silt fence.
- 4) The City provided a copy of the SWPPP for the Facility, dated June 20, 2017.

Manassas Park City Schools Maintenance Facility

Address/Location: 8200 Euclid Ave, Manassas Park, VA 20111

Relevant Minimum Control Measure (MCM): PPGH

Entry Time: 10:00 AM (EST) February 16, 2023

Exit Time: 10:21 AM (EST)

Description: The Manassas Park City Schools Maintenance Facility (hereinafter, Maintenance Facility or Facility) is used mainly for the storage and vehicle washing of municipal vehicles including school buses. The Facility representatives stated no vehicle maintenance is done at this facility.

Conditions: The EPA Inspection Team made the following observations at the Maintenance Facility.

- 1) The EPA Inspection Team observed a floor drain in the main maintenance building that had a broken cap and was exposed. The Facility representative was unsure where the drain led (refer to [Appendix B, Photograph 30](#)). After the inspection, City staff stated that they replaced the cap on February 21, 2023.
- 2) The EPA Inspection Team observed a designated vehicle washing area. During the washing process, a valve is opened, which diverts the water into the City's sanitary sewer system. Otherwise, the stormwater from the washing area is discharged into the stormwater system (refer to [Appendix B, Photograph 31](#)).

Blooms Park Maintenance Facility

Address/Location: 9701 Manassas Dr, Manassas Park, VA 20111

Relevant Minimum Control Measure (MCM): PPGH

Entry Time: 10:37 AM (EST) February 16, 2023

Exit Time: 10:50 AM (EST)

Description: The Blooms Park Maintenance Facility (hereinafter, Maintenance Facility or Facility) is used mainly for the storage of municipal vehicles including lawnmowers. The Facility was originally a golf course that was acquired by the City around 2 years ago. Facility representatives stated that there was no oil or salt storage.

Conditions: The EPA Inspection Team made the following observations at the Maintenance Facility.

- 1) The City did not provide a SWPPP for this Facility at the time of the inspection.
- 2) The EPA Inspection Team observed a drain outside the main building. Facility representatives were unsure where the drain led (refer to [Appendix B, Photograph 32](#)).

FIELD INSPECTION CLOSING CONFERENCE

After the field inspections, the EPA Inspection Team met with the City representative for a closing conference and shared preliminary observations. The EPA Inspection Team reiterated that all preliminary observations discussed were not compliance determinations. Any and all preliminary observations shared were subject to further investigation by the EPA Inspection Team. Additional observations may be contained in this inspection report that were not identified at the time of the closing conference.

The inspection concluded at approximately 3:00 PM (EST).