



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, Pennsylvania 19103-2852

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): July 21, 2022
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Municipal Stormwater
Site/Facility Name: City of Colonial Heights
Permittee(s): City of Colonial Heights MS4
Site/Facility Address: 201 James Avenue, PO Box 3401, Colonial Heights, VA 23834
Latitude: 37.2545N **Longitude:** 77.4093W
County/Parish: Chesterfield County
General Permit #: VAR04
Specific Permit #: VAR040009
NAICS Code: 924110 **SIC:** 9511
Unique Project #: 3E22WN098A

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Date

September 9, 2022

Supervisor
Signature/Date

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Date

Unique Project#: 3E22WN098A

Table of Contents

I. Introduction 3

 A. Inspection Opening Conference 3

 B. Weather and Precipitation Conditions..... 4

II. MS4 Activity 4

III. Observations 5

IV. Records Review 5

V. Closing Conference..... 7

List of Attachments

- Attachment 1: The NPDES MS4 Permit
- Attachment 2: 2021 Annual City MS4 Report
- Attachment 3: SWM FACILITY INSPECTIONS 2021
- Attachment 4: SWM Facility As-built Plans
- Attachment 5: MS4 Inspections 2021
- Attachment 6: 2020-2021 MS4 Training
- Attachment 7: Photo Log
- Attachment 8: Floor Drains

I. Introduction

On July 21, 2022, an inspection team comprised of staff from the U.S. Environmental Protection Agency (EPA) Region III (hereinafter, "EPA Inspection Team") met with representatives of the Virginia Department of Environmental Quality (VADEQ) and the City of Colonial Heights ("City") at the City maintenance facility. The purpose of the inspection was to review the City's compliance with their Virginia Pollutant Discharge Elimination System Permit (VPDES) No. VAR040009.

Prior to the inspection, the EPA Inspection Team reviewed the Attachment 1 - MS4 General Permit or the Permit and Attachment 2 - 2021 MS4 Annual Report. The Inspection Team also requested and reviewed; Attachment 3 - SWM Facility Inspections 2021; Attachment 4 - As-built Plans for SWM Facilities; Attachment 5 - MS4 Inspections 2021; Attachment 6 - 2020-2021 MS4 Training; Attachment 7 - Photo Log; and Attachment 8 - Floor Drains.

As part of the inspection, the Inspection Team reviewed efforts regarding minimum control measures for illicit discharge detection and elimination; post-construction stormwater management; and pollution prevention and good housekeeping for facilities owned or operated by the City within the MS4 service area, as well as the City's Annual Reports. The EPA Inspection Team inspected three post construction stormwater management facilities that were selected by the EPA Inspection Team prior to the inspection and one of the City's maintenance yards.

The photographs for this report have been processed in order to assign to each photo the original camera-generated file name (e.g., IMAG0032) and the date and time the photo was taken (e.g., 2022-03-19--15.53.01). The camera-generated file name is used to identify each photo in the main narrative of this inspection report. Unused photos are digitally stored and maintained in the inspection file. Unused photos are available upon request.

A. Inspection Opening Conference

The EPA Inspection Team arrived at the maintenance facility at approximately 9:00 am. The EPA Inspection Team identified themselves to the City representatives, displayed their credentials and described the purpose of the compliance inspection. The EPA Inspection Team with the City representatives then inspected the maintenance facility and the three structural stormwater management facilities. The Inspection Team's observations are listed later in this document and are grouped by type of observation. The inspection ended at approximately 11:35 am.

Weather and Precipitation Conditions

During the inspection, weather was sunny. National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the date of the inspection and 5 days prior are provided in the table below:

Precipitation Data

Station Name	Date	Precipitation Amount (inches) ¹
PETERSBURG, VA US USC00446656	07/16/22	0.07
PETERSBURG, VA US USC00446656	07/17/22	0.03
PETERSBURG, VA US USC00446656	07/18/22	0.00
PETERSBURG, VA US USC00446656	07/19/22	0.00
PETERSBURG, VA US USC00446656	07/20/22	0.00
PETERSBURG, VA US USC00446656	07/21/22	0.74

II. MS4 Activity

According to the United States Census Bureau, the City has a total area of 7.8 square miles (20.2 km²), of which 7.5 square miles (19.4 km²) is land and 0.3 square miles (0.8 km²) of it (3.7%) is water. Colonial Heights is located just north of the Appomattox River across from the City of Petersburg at the river's fall line. It is located south of Chesterfield County (largely surrounded by the County, except for a southern border with Petersburg) and in some areas, Swift Creek divides the City from the county. Existing regulated outfalls will be identified for annual inspection and illicit discharge tracking. The City owns and operates a municipal separate storm sewer system (MS4) that consists of manmade and natural components of a stormwater management infrastructure to both limit and manage the volume of stormwater to mitigate flood events and to minimize degradation of the City's waterways through stormwater quality management. The City is authorized to discharge stormwater runoff from the MS4 under the Virginia Stormwater Management Program (VSMP) regulations and a VPDES permit.

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

III. Observations

The EPA Inspection Team conducted inspections of the Colonial Heights municipal maintenance facility and three post construction stormwater management facilities. The observations made by the EPA Inspection Team are identified below.

MCM 3 - Illicit Discharges

The Permit, Part 1, requires -

3. Illicit discharge detection and elimination ...

- b) If the total number of MS4 outfalls is equal to or less than 50, a schedule to screen all outfalls annually;

Observation #1:

The City's 2021 Annual Report (Attachment 2), contains documentation of the City's inventory of outfalls and the City's efforts to conduct dry weather screening. It is not clear if all outfall screenings have been conducted for this year.

MCM 5 - Post-construction Stormwater Management Facilities (SWMF)

The Permit, Part 1 requires -

5. Post-construction stormwater management for new development and development on prior developed lands

- a. The permittee shall address post-construction stormwater runoff that enters the MS4 from the following land disturbing activities by implementing a post-construction stormwater runoff management program as follows:
- b. The permittee shall implement an inspection and maintenance program for those stormwater management facilities owned or operated by the permittee that discharges to the MS4 as follows:
 - (2) The permittee shall inspect stormwater management facilities owned or operated by the permittee no less than once per year. The permittee may choose to implement an alternative schedule to inspect these stormwater management facilities based on facility type and expected maintenance needs provided that the alternative schedule and rationale is included in the MS4 program plan. The alternative inspection frequency shall be no less than once per five years;

Observation #2:

The City provided the EPA Inspection Team with its SWMF Inventory for 2022 (Attachment 3), which describes their efforts regarding post-construction stormwater management facilities. According to Attachment 3, all SWMF inspections that are required by the Permit were completed during the July 1, 2020 to June 30, 2021 reporting period.

Observation #3:

As-built plans (Attachment 4) for three SWMFs were requested and reviewed by the EPA Inspection Team for the inspection. The EPA Inspection Team inspected three Facilities (BMP 9; BMP 16; and BMP 19) located within the City. BMP 16 and BMP 19 were constructed at the location recorded in Attachment 3 and configured as recorded in Attachment 4. The EPA Inspection Team observed erosion at BMP 009. The EPA Inspection Team also observed that a pooling area required prior to the outfall, as noted on the as-built plans for BMP 9, did not appear to be constructed. Refer to Attachment 7 - Photo Log for photographs taken during the inspection.

For photographs pertaining to BMP 9, refer to: P7210148 through P7210150 and P7210155.

For photographs pertaining to BMP 16, refer to: P7210092 and P7210093.

For photographs pertaining to BMP 19, refer to: P7210156 and P7210157.

MCM 6 - Good Housekeeping

The Permit, Part 1 requires -

6. Pollution prevention and good housekeeping for facilities owned or operated by the permittee within the MS4 service area.
 - a. The permittee shall maintain and implement written procedures for those activities at facilities owned or operated by the permittee, such as road, street, and parking lot maintenance; equipment maintenance; and the application, storage, transport, and disposal of pesticides, herbicides, and fertilizers designed to:
 - (6) Prevent pollutant discharge into the MS4 from leaking municipal automobiles and equipment;

Observation #4:

Photographs of the maintenance facility that display controls put in place by City include photographs P7210116, P7210122, P7210125, and P7210126.

Additional interest pertains to photographs P7210123 and P7210124 due to what appears to be a petroleum sheen becoming visible after the sediment in the BMP is agitated.

Additional interest pertains to photographs P7210109 (petroleum staining), P7210113 (sediment), P7210114 (salt staining), P7210115 (salt staining), P7210117 (liquids stored outside), P7210118 (petroleum staining), P7210119 (salt staining), P7210128 (petroleum staining), P7210132 (uncovered dumpster), P7210135 (unconnected hydraulic lines) and P7210137 (vehicle washing) relating to pollution prevention and good housekeeping.

Additional interest pertains to photographs P7210110 and P7210162 relating to discharges to the floor drains reaching surface waters.

The Permit, Part 1 requires -

d. Each SWPPP as required in Part I E 6 c shall include the following:

- (7) An inspection frequency of no less than once per year and maintenance requirements for site specific source controls. The date of each inspection and associated findings and follow-up shall be logged in each SWPPP;

Observation #5:

The City provided Attachment 5 - MS4 Inspections 2021. Attachment 5 provides information that indicates the City conducted MS4 inspections in accordance with the Permit for 2021.

The Permit, Part 1 requires -

m. The permittee shall develop a training plan in writing for applicable staff that ensures the following:

- (2) Employees performing road, street, and parking lot maintenance receive training in pollution prevention and good housekeeping associated with those activities no less than once per 24 months;

Observation #6:

The City provided Attachment 6 - MS4 TRAINING. Attachment 6 provides information that indicates that the City conducted pollution prevention and good housekeeping training for its staff for the reporting period July 1, 2020 through June 30, 2021.

IV. Records Review

As part of this inspection, the EPA Inspection Team reviewed the documents identified in the List of Attachments at Page 2 of this report.

V. Closing Conference

At the conclusion of the field inspection, the EPA Inspection Team conducted a closing conference with City representatives and shared preliminary observations. The EPA Inspection Team reiterated to the City representatives that all preliminary observations discussed were not compliance determinations. Preliminary observations shared with the City are subject to further investigation by EPA, including additional review of records and documentation. As a result, 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 11:25 AM (EDT).