



CITY OF FALLS CHURCH

September 29, 2017

Regional Water Permits & Planning Manager
Virginia Department of Environmental Quality
Northern Regional Office
13901 Crown Court
Woodbridge, VA 22193

Subject: Small MS4 Program Plan – Annual Report – Program Year 4

To Whom It May Concern:

The City of Falls Church, Virginia is submitting the enclosed Annual Report for Program Year Four (PY4) in accordance with the Department of Environmental Quality approved MS4 Program Plan requirements dated July 1, 2013.

The City's PY4 Annual Report provides a summary of activities performed between July 1, 2016 and June 30, 2017, as required by the MS4 Program.

As the duly authorized representative for the City 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.

If you have any questions please feel free to contact me at (703) 248-5026 or by email at jwidstrom@fallschurchva.gov.

Sincerely,

Jason Widstrom, P.E.
Principal Engineer



Municipal Separate Storm Sewer System
Program Plan
Permit Number VAR040065

Annual Report
Permit Year Four (PY4)

September 30, 2017

Performed for compliance with the
Authorization to Discharge Under the
Virginia Pollutant Discharge Elimination System (VPDES)
and the Virginia State Water Control Law
Clean Water Act (CWA)

CITY OF FALLS CHURCH

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I. INTRODUCTION

On July 8, 2013, the City of Falls Church received authorization as an operator of a small municipal separate storm sewer system (MS4) to discharge to surface waters within the boundaries of the Commonwealth of Virginia under the Virginia Pollutant Discharge Elimination System (VPDES) MS4 General Permit. The MS4 General Permit, which expires June 30, 2018, requires the City to adhere to an approved MS4 Program Plan. The July 2013 authorization was based on a continuance of the City of Falls Church's 2012 MS4 Program Plan that was in compliance with prior Storm Water Management Program Permit Regulations. This report covers the requirements of that Program Plan, which was updated and included in the Permit Year 2 report (*October 1, 2015*).

The City of Falls Church is required to submit an annual report to remain in compliance with the MS4 General Permit. The report describes the City's collective efforts in stormwater management and updates the progress toward meeting the Best Management Practices (BMPs) for each of the six (6) Minimum Control Measures (MCMs) identified in the City's 2015 MS4 Program Plan. Tasks required by the permit in Permit Year Four (PY4) and contained in this annual report are annotated with a BMP shown in italics, for example (*BMP A*), and each corresponds to the MS4 Program Plan. This report places an emphasis on the accomplishments made in PY4, other actions undertaken by the City to meet the stated goals, and a look forward to new general permit requirements. Supporting documentation is provided in the appendices.

II. PROGRAM ADMINISTRATION

Program Plan Updates (Program Administration *BMP A*) – The administration of the City's MS4 Program Plan is an important aspect of the plan itself. Throughout the life of the current permit, the plan will remain a dynamic document. The City will update and, where necessary, provide additional schedules to implement BMPs. The process is ongoing from one permit year to the next. To that extent, the City updated the MS4 Program Plan for PY5 to include TMDL actions plan implementation. The updated MS4 Program Plan (September 29, 2017) is provided in Appendix A.

Total Maximum Daily Load (TMDL) Action Plan Implementation (Program Administration *BMP B*) – The City is subject to the Chesapeake Bay TMDL and three (3) local TMDLs as outlined below:

- PCB TMDL for the Potomac River
- Fecal Coliform TMDL for Four Mile Run Watershed
- Fecal Coliform TMDL for Hunting Creek, Cameron Run, and Holmes Run Watersheds

Chesapeake Bay TMDL

As required by Section I C of the MS4 General Permit, the PY2 Annual Report included a Chesapeake Bay TMDL Action Plan for the City of Falls Church. The TMDL Action Plan outlines how the City will achieve the first 5-year milestone of 5% reduction in Pollutants of Concern (POCs).

During PY4 one (1) new BMP was completed to meet the milestones outlined in the Chesapeake Bay TMDL Action Plan. This new BMP is designed to remove 1.69 lbs. of phosphorus per year. The City's cumulative progress toward meeting the compliance targets for nitrogen, phosphorus, and total suspended solids are provided in Table 1.

Table 1: Cumulative Progress for Chesapeake Bay TMDL Nutrient Reductions

Pollutant	First Permit Cycle (lbs.)	Second Permit Cycle (lbs.)	Third Permit Cycle (lbs.)	Total Estimated Reductions (lbs.)	Current (PY4)	Percent Complete
Nitrogen	66.10	463.00	793.90	1,323.00	306.69	23.18%
Phosphorus	8.70	60.90	104.50	174.20	140.85	80.86%
Total Suspended Solids	7,466.10	52,263.00	89,593.80	149,323.00	84,642.44	56.68%

Local TMDL Action Plans

In response to the two local TMDLs provided above, the City has prepared the following local TMDL Actions Plans:

- Polychlorinated Biphenyl (PCB) TMDL Action Plan for Four Mile Run.
- Bacteria TMDL Action Plan for the Four Mile Run Watershed and the Holmes Run Watershed. Note: This Bacteria TMDL Action Plan addresses both the Four Mile Run Bacteria TMDL and the Holmes Run Bacteria TMDL.

For the PCB TMDL Action Plan, the City conducted a desktop evaluation of all City owned or operated property within the area subject to this action plan to ascertain whether there are potentially significant sources of PCBs; however, it was concluded that the City does not own or operated any properties that represent a potentially significant source of PCBs. Due to potential legacy PCBs, the City included information regarding PCB identification and response in its employee training during PY3 as outlined in the City's training schedule provided in Appendix I (see MCM#6, BMP B).

For the Bacteria TMDL Action Plan, the City implements the following programs and activities:

- Prohibition on illicit discharges
- Prohibition on new septic systems
- Sanitary sewer inspection program

- Dry weather outfall screening program
- Stormwater control and runoff reduction program
- Catch basin and street sweeping programs
- Stream daylighting program
- Installation of pet waste stations
- General public education and outreach
- Targeted public education and outreach on bacteria focused on dog owners
- Regional education and outreach on proper disposal of pet wastes

Roles and Responsibilities

There were no changes to the City's roles and responsibilities in PY4. The City will not be relying on another government entity to satisfy permit obligations.

III. PUBLIC EDUCATION AND OUTREACH (MCM#1)

Each year the City of Fall Church performs education and outreach activities related to stormwater and water quality. As part of the MS4 Program Plan, our city distributes educational materials to the community and conducts outreach activities about the impacts of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff. Public education and outreach activities conducted in PY4 were based upon the three (3) high-priority water quality issues outlined in the City's Public Education Outreach Table: bacteria, illicit discharge, and household waste. The City's Public Education and Outreach Table, included in Appendix B, also shows our current and future activities for the current permit cycle and which high-priority water quality issue each activity addresses.

The City of Falls Church, Department of Public Works (DPW), working in partnership with the State, citizen volunteers, local/regional non-profit groups, and neighboring jurisdictions, has conducted a variety of education and outreach activities during PY4. Among these are the following:

Watershed and Floodplain Awareness Month – The City Mayor proclaimed May 2017 "Watershed Awareness Month". This year a stormwater engineer read an announcement outlining the importance of watershed protection and outlining various activities sponsored by the City in celebration of Watershed Awareness Month. Additionally, the City also proclaimed June 3-11, 2017 as Chesapeake Bay Awareness Week. The Mayor's proclamations are provided in Appendix C.

Local Newspapers (MCM#1 BMP A) – In PY4, DPW staff placed the following two (2) articles on watershed protection in the *Falls Church News-Press* (total circulation of 10,000 in the greater Falls Church area). Although the City's MS4 Plan states that three (3) articles will be published each permit

year, the City achieved the goal of reaching 20% of the target audience through other means. In addition, the City intends to publish one (1) extra article in PY5. The City published an article regarding the discharge of pool water around Labor Day (2017), early in the PY5 schedule, to address a growing concern about closing pools at the end of the summer. Both articles published in PY4 are provided in Appendix B. A summary of the articles, including information regarding priority issue, audience, etc., is provided in the MS4 Permit Year 4 - Education and Outreach Table in Appendix B.

- Scoop the Poop: A Homeowner's Guide to a Healthy Watershed (*May 2017*)
- The Benefits of Conservation Landscaping & Rain Barrels (*June 2017*)

Northern Virginia Clean Water Partners (MCM#1 BMP B) – The City participated with other local jurisdictions as part of the Northern Virginia Clean Water Partners (NVCWP) to conduct a regional advertising campaign targeting the most prevalent and controllable forms of contamination in local waterways, including pet waste, household chemicals, and disposal of waste oil. The NVCWP funded an “Only Rain Down the Drain” advertising campaign through Comcast Spotlight and covered the topics of pet waste, lawn care, and auto care. Through this campaign, the NVCWP commercial received 42,768,486 household impressions in PY4. The City estimates that 1% or 42,768 of these impressions targeted City residents resulting in more than 20% of our target audience being reached. A copy of the NVCWP annual report can be found in Appendix B.

Stormwater Website (MCM#1 BMP C, BMP D) – In May of 2014 the City of Falls Church launched a brand-new website. This allowed DPW and the Office of Communications staff to update and freshen up the stormwater web pages. The new web pages list information on stormwater pollution, stormwater projects, the MS4 program, the updated stormwater ordinance, and the Stormwater Utility Program. The stormwater section also has information about different BMPs and credit programs for the Stormwater Utility. The Select material is provided in Spanish. All the materials can be found using our shortcut link, <http://www.fallschurchva.gov/173/Stormwater>. During PY4, there were 544 page views from 433 visitors to the stormwater web page.

Pet Waste Outreach (MCM#1 BMP E) – DPW developed a mailer specifically targeting pet owners to educate them on proper management of pet waste for the protection of water quality. It was mailed to all 1,081 citizens who hold a dog license. The same publication continued to be made available throughout City Hall and on the City's website in PY4. A copy of the mailer is included in Appendix B.

Citizen engagement (MCM#1 BMP F) – Starting on May 7, 2014, a Request Tracker on the City’s website enabled citizens with an opportunity to provide input on stormwater issues from flooding to illicit discharges. The system is easily accessible and frequently used by the public. Five (5) citizen took advantage of it for stormwater-related complaints in PY4. We typically get direct emails and phone calls from residents that view our website and get contact information. During PY4 we had 246 contacts specifically for stormwater-related items logged in our database.

IV. PUBLIC INVOLVEMENT / PARTICIPATION (MCM#2)

The City promotes public involvement in stormwater related matters whenever possible, as it is viewed as another component of the City’s education and outreach activities. Each year the City of Falls Church provides opportunities for the public to be involved with the implementation of the stormwater management program and to report possible stormwater pollution incidents. Among these are the following:

City Council (MCM#2 BMP A) – In PY4 the City Council discussed stormwater funding and approval of contracts for stormwater projects during work sessions and regular meetings. The City Council also proclaimed May 2017 Watershed and Floodplain Awareness Month and June 3-11, 2016 as Chesapeake Bay Awareness Week. The approved proclamations are provided in Appendix C.

Citizen engagement (MCM#2 BMP B) – On May 7, 2014, the City’s Request Tracker on the website enabled citizens with an opportunity to provide input on stormwater issues from flooding to illicit discharges. The system is easily accessible and frequently used by the public. Five (5) citizens took advantage of it for stormwater-related complaints in PY4.

Environmental Services Council (ESC) (MCM#2 BMP C) – The ESC, a citizen advisory board to City Council, lists watershed quality as one of its primary areas of focus. The group continues to have the opportunity to comment on large development projects and to make recommendations for development concessions such as green roofs, water retention features, green space, and landscaping improvements. The agenda for the one (1) meeting held in PY4 pertaining to the MS4 Program is provided in Appendix C.

Habitat restoration (MCM#2 BMP D) – The Falls Church Habitat Restoration Team, a subgroup of the ESC, along with the City’s Urban Forestry Division hosted nine (9) habitat restoration events in PY4. The volunteers engaged in removing non-native invasive plants as well as planting native plants. The task group also hosted a native plant sale to promote the importance of planting native trees and shrubs. 270 citizens participated in the habitat

restoration events to remove invasive species (English Ivy, Bush Honeysuckle, Wineberry, Multi-flora Rose, Garlic Mustard, Bamboo, Periwinkle, and Creeping Euonymus) within four (4) City parks. Over 46,000 square feet of habitat was restored and over 38,000 herbaceous plants and 200 woody plants were planted. The flyers for these events are provided in Appendix C.

Neighborhood Tree Program (NTP) (MCM#2 BMP E) – The NTP was initiated by the Village Preservation and Improvement Society (VPIS) in 2000 as a response to the decreasing number of City street trees. The NTP is a collaboration between citizen volunteers (through VPIS) working in partnership with the City’s Urban Forestry Division. Its goals are to increase the number of trees in the City and educate the community about the importance of trees, which help to slow down runoff, thereby reducing erosion, and improve water and air quality by removing pollutants. Since its foundation in 2000, the program has planted hundreds of street trees in the City. In PY4 the City continued to support the program financially and promote NTP events using staff time and resources, which resulted in the NTP engaging approximately 37 volunteers and planting 57 trees.

Promote city-wide clean-up events (MCM#2 BMP F) – Each year the City holds two (2) clean-up events (Fall 2016 and Spring 2017). In PY4 the City had 180 volunteers (128 in the fall, 52 in the spring) that picked up a total of 32 bags of recyclables and trash. An example of the flyer can be found in Appendix C. More information on the City’s program can be found here:<http://www.fallschurchva.gov/940/Environmental-Volunteer-Opportunities>

The City also promoted a Recycling Extravaganza & Household Hazardous Waste Disposal Day. 745 impressions were made for this event on October 15, 2016. The flyer for this event is provided in Appendix C.

Provide MS4 Program Plan on City website and in hard copy at City Hall (MCM#2 BMP G) – The latest versions of the MS4 Program Plan and annual reports can be found online: <http://www.fallschurchva.gov/262/Yearly-Permits>.

Public Education and Outreach Plan (MCM#2 BMP H) – The City’s Public Education and Outreach Table is included in Appendix B. The table shows our current and future activities for the current permit cycle. The City’s goal is to reach 20% of the population. In PY4, the City was most successful with its advertising in the local paper and through the NVCWP ad campaign. A copy of the NVCWP annual report can be found in Appendix B.

V. ILLICIT DISCHARGE DETECTION / ELIMINATION (MCM#3)

The City currently takes a proactive stance when dealing with illicit discharges. In PY1 the City adopted Chapter 35, Stormwater, which contains

a section for the definition and enforcement of Illicit Discharges. The Code gives the City clear authority to investigate complaints and address issues quickly. In an effort to limit illicit discharges, each year the City of Falls Church proactively performs activities to target specific audiences. During PY4 the City did so in the following ways:

Citizen Engagement (MCM#3 BMP A) – Starting on May 7, 2014, the Request Tracker on the City’s website enabled citizens with an opportunity to provide input on stormwater issues from flooding to illicit discharges. The system is easily accessible and frequently used by the public; however, no citizens took advantage of it for illicit discharge-related complaints in PY4.

Storm Drain Map Updates (MCM#3 BMP B) – In PY1, the City continued to use the storm drain mapping provided by the United States Army Corps of Engineers, as noted in the last annual report. The map, which covers the entire city, exists in a GIS format created from a comprehensive physical survey of the City’s storm system. It identifies sub-drainage areas within the city limits that either drain into Tripp’s Run or Four Mile Run. As DPW staff performs general maintenance to the storm drainage system they are flagging inconsistencies in the mapping. Our engineering inspectors then locate the structures with a handheld GPS data collector that has sub-meter accuracy. No outfalls were added to our inventory in this permit cycle.

The City increased its outfall inventory by 16 in PY4 as it converted interconnected pipes to new outfalls at the point of interconnection. All outfalls will be screened during dry weather in PY5. The complete MS4 Storm Sewer Map and the MS4 Outfall Data Table are provided in Appendix D.

Notification of Interconnection (MCM#3 BMP C) – This was not performed in PY4 because there were no changes to outfalls in the City’s stormwater conveyance system.

IDDE Program (MCM#3 BMP D) – The City operates an Illicit Discharge Detection and Elimination (IDDE) Program. Written procedures to detect, identify, and address unauthorized non-stormwater discharges are provided in the Illicit Discharge Detection and Elimination (IDDE) Standard Operating Procedures Manual (*Second Edition, January 2015*).

Outfall Screening (MCM#3 BMP D) – 35 outfalls were screened during dry weather. All outfalls with flow were screened for visual indicators. If dry weather flow was observed, characteristics of the flow were noted and water quality grab samples were collected to perform the following in-field analyses: temperature, conductivity, pH, turbidity, ammonia, and total chlorine. A summary of the outfall screening results is provided in Appendix E.

During the outfall screening, outfalls were categorized as “suspect” if the flow was present and there was visual evidence of illicit discharge. In PY4, eight (8) outfalls were categorized as “suspect.” Due to the timing of field data collection and annual reporting timeline, dry weather screening follow-up on the eight (8) “suspect” outfalls will be completed and reported in PY5.

Targeted Outreach (MCM#3 BMP E) – In PY4, DPW staff distributed a letter and poster to all local automotive businesses. The purpose was to educate them about possible/common sources of pollution stemming from the automotive industry. Included with the letter was a poster entitled “Good Cleaning Practices” along with a flier entitled “Stormwater Pollution Prevention” for each employee to read over. The flier was provided in both English and Spanish. Copies of the letter, poster, and flier can be viewed in Appendix B.

Illicit Discharge Code (MCM#3 BMP F) – The new stormwater ordinance containing illicit discharges language was adopted on March 24, 2014. A copy of the ordinance was provided in the PY1 annual report. No updates were made to the ordinance during PY4.

VI. CONSTRUCTION SITE STORMWATER RUNOFF CONTROL (MCM#4)

Erosion and Sediment Control Program (MCM#4 BMP A) – In January 2007, the Virginia Department of Conservation and Recreation (DCR) conducted a review of the City’s Erosion and Sediment Control (E&C) program to gauge compliance with Virginia DCR standards. The review found that the City met the minimum standards of effectiveness in controlling erosion, sediment deposition, and nonagricultural runoff and is “consistent” with Virginia Erosion and Sediment Control Law and Regulations.

In PY1, DEQ approved the City’s Virginia Stormwater Management Program (VSMP). As part of the application process, the City had to demonstrate different aspects of its program as it relates to this MCM. A copy of the VSMP application package can be made available if needed. By the end of PY5, the City intends on combining the elements of the construction site stormwater runoff control program, post-construction, and illicit discharge program into a single document called the Falls Church Stormwater Management Handbook. The creation of the document was delayed due to staff workload.

In PY4, City staff oversaw 23 active construction sites with a land disturbance plan totaling 5.38 acres. 1,032 inspections were logged in the Erosion and Sediment Control Inspection Database. The City provided 36 written warnings and issued 4 Notices to Comply during the last year. Compliance was typically reached using verbal and written warnings. Zero fees were issued for E&S violations or sediment-laden illicit discharge.

Construction Site SOP (MCM#4 BMP B) – The City developed a Construction Site Stormwater Runoff Control Program Operating Procedure document in PY2. No changes were made to this document in PY4. The City will incorporate this document into a single document called the Falls Church Stormwater Management Handbook in PY5.

Citizen Engagement (MCM#4 BMP C) – Starting on May 7, 2014, the Request Tracker on the City’s website enabled citizens with an opportunity to provide input on erosion and sediment control issues. The system is easily accessible and frequently used by the public; however, no citizens took advantage of it for E&S related complaints in PY4.

VII. POST-CONSTRUCTION STORMWATER MANAGEMENT (MCM#5)

Chesapeake Bay Preservation Ordinance (MCM#5 BMP A) – The City of Falls Church continues to implement the provisions of the Chesapeake Bay Preservation Overlay District (CBPOD) Ordinance, specifically as they relate to the MS4 Program Plan post-construction stormwater management. The City also maintains a highly rated, consistent Chesapeake Bay Preservation Ordinance as required under the Virginia Chesapeake Bay Preservation Area Designation and Management Regulations. The City was audited by DEQ in March 2017; however, a report detailing the results has not been delivered. Therefore, the City considers itself still in compliance with the regulations.

In 2014, DEQ approved the City’s VSMP. As part of the application process, the City had to demonstrate different aspects of its program as it relates to this MCM. By the end of PY5, the City intends on combining the elements of the construction site stormwater runoff control program, post-construction, and illicit discharge program into a single document called the Falls Church Stormwater Management Handbook.

Stormwater Facilities (MCM#5 BMP B, C) – The review process for new developments and redevelopments remains integrated into the building permit process and is permitted under the City’s Stormwater Management Permit. A permit is required as part of a grading plan or a site plan when land disturbance exceeds 2,500 square feet or is located in the Resource Protection Area (RPA). Where required by City Code, stormwater BMP facilities are installed and approved by City staff. Prior to construction, the City requires a signed and recorded maintenance agreement for these facilities. A Microsoft Access database is used to track pertinent information about these facilities, such as the type of facility, location, watershed, and area treated. A list of the new BMPs for PY4 is provided in Appendix F.

In PY4, City staff oversaw 23 new land disturbance plans totaling 5.38 acres. Two (2) new BMPs came online during PY4. Both facilities drain to Tripp's Run (PL-26) and treat a total of 0.52 acres.

Due to the small size of the development/redevelopment projects within the City, many developers and owners choose to purchase nutrient credits to satisfy runoff reduction requirements.

Stormwater Facility Inspections (MCM#5 BMP D, E) – In PY4 the City continued inspections of stormwater BMP/facility assessments and enforcement actions. During PY4, the City inspected 14 privately-owned BMPs and all 29 City-owned BMP, including those of Falls Church City Public Schools. A summary of the BMP inspections is provided in Appendix G. Due to the timing of field inspections and annual reporting timeline, BMP follow-up and maintenance will be completed and reported in PY5. The City intends on bolstering follow-up efforts on issues identified during inspections in future permit years.

BMP Inspection Policies and Procedures (MCM#5 BMP F) – Written procedures for BMP inspection policies and procedures, including template enforcement letters, are provided in the Stormwater Management (SWM) Facility Inspection Standard Operating Procedure (SOP) Manual (*February 2016*). By the end of PY5, the City intends on merging this document with the Falls Church Stormwater Management Handbook.

VIII. POLLUTION PREVENTION / GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS (MCM#6)

The City continued to maintain and revise, as needed, the Operation and Maintenance Program in PY4. The ultimate goal of this program is to prevent/reduce pollutant runoff from municipal operations through education, specific training, and program analysis. The City performed the following activities in PY4 to achieve this goal:

Street Sweeping (MCM#6 BMP A) – The City continued its street-sweeping contract in PY4. Street sweeping was performed twice along streets in commercial and residential corridors as stipulated in the permit. The City also requested additional street sweeping on an as-needed basis. Sweeping accounted for 65.2 tons of sediment and debris being removed from the streets during PY4. A copy of the City's street sweeping logs is provided in Appendix H.

Leaf Collection – The Operations Division vacuums leaves from all residential streets within the City each year, from mid-October to the end of December. This practice is a cost-effective way of removing organic material that may otherwise accumulate on streets and wash into the storm drain system. The

collected leaves are ground into leaf mulch and delivered back to residents for use on their properties. The leaf mulch provides a beneficial way for residents to improve soil quality and reduce water use.

Training (MCM#6 BMP B) – Employees in the Engineering Division, Operations Division and Urban Forestry Division of DPW and maintenance crews with Recreation and Parks received pollution prevention training on March 30, 2017. The topics covered during the PY4 training were Minimizing Stormwater Pollution from Street, Parking, and Drainage Operations and Maintenance and Minimizing Stormwater Pollution from Parks and Grounds Maintenance. A slideshow was shown to staff and followed with discussion. The presentation and a list of attendees are provided in Appendix I.

Additionally, employees receive regular on-the-job training to prevent pollution or contamination from entering the stormwater based on the job functions they are assigned. For example, crews responsible for sewer line breaks are trained to properly contain and clean up the contaminated area.

The City has three (3) employees trained to perform solid waste code inspections. These inspectors are responsible for the enforcement of the City's Solid Waste Code, Chapter 13. Operation's street crews and residents report potential code violations and inspectors are responsible for inspection, notifying the responsible party, and ensuring correction. A solid waste code log is used to track violations.

Fairfax County Health Department is contracted by the City of Falls Church to respond to solid waste complaints that include a health component (such as rats or mosquitoes). The Arlington County Fire Department and the City of Falls Church Volunteer Fire Department respond to hazardous material spills.

A copy of the updated Training Schedule and Program is provided in Appendix I. A copy of training modules will follow in future annual reports as they are provided as part of the City's training program.

Facilities Assessment and SOPs (MCM#6 BMP C, D, E) – In PY1 the City investigated its facilities to document those considered high-priority as outlined by the new general permit. Two (2) facilities, the City Property Yard and the City's Remote Storage Yard, were determined to meet the definition of a high priority municipal facility requiring a Stormwater Pollution Prevention Plan (SWPPP). A draft SWPPP was prepared in PY1. In PY4, the SWPPP was updated to include new development (e.g., the 50'x60' Salt and Sand Shed) and is fully implemented. A copy of the SWPPP is housed on-site at the City Property Yard.

(MCM#6 BMP F) In PY1 the City investigated sites for the need of a nutrient management plan (NMP). Only one (1) site, Thomas Jefferson Elementary School (TJES) with 3.1 acres of managed turf, required a NMP based on the

conditions outlined in the MS4 General Permit. A draft NMP for TJES and a NMP SOP was developed in PY1.

The City began coordination with Falls Church City Public Schools and Recreation and Parks in PY4 for NMP implementation. An update to the NMP is scheduled to be completed in PY5 with full implementation.

(MCM#6 BMP G) – SOPs for the reduction of potential stormwater pollution and proper waste materials for City facility were developed in PY1. No updates were required for these SOPs in PY4.

IX. SUMMARY OF ACTIVITIES PLANNED FOR PERMIT YEAR

During PY5, the City will undertake activities identified in the current MS4 Program Plan, relating to public outreach and participation, public involvement, illicit discharge and elimination, construction site stormwater runoff control, post-construction stormwater management, good housekeeping for municipal operations, and TMDL specific projects.

After an evaluation of the of program compliance, the appropriateness of programmatic BMPS, and the progress towards achieving measurable goals, no changes in BMPs or measurable goals were identified for any of the MCMs including steps to be taken to address any deficiencies.

X. RESULTS OF INFORMATION COLLECTED AND ANALYZED

There are currently no requirements for monitoring or data analysis in the MS4 General Permit; therefore, no additional information outside the normal outfall investigations and IDDE response operations was performed in PY4.