



CITY OF FALLS CHURCH

October 1, 2015

Mr. Bryant Thomas
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 2

Dear Mr. Thomas:

The City of Falls Church, Virginia is submitting the enclosed Annual Report for Program Year Two (PY2) in accordance with the Department of Environmental Quality approved MS4 Program Plan requirements dated July 1, 2013.

The City's PY2 Annual Report provides a summary of activities performed between July 1, 2014 and June 30, 2015, as required by the MS4 Program. Additionally, the City has included an update to the MS4 Program to address the requirements shown in Table 1 of 9VAC25-890-40. A few of the updates to the program are highlighted below:

- Chesapeake Bay TMDL Action Plan – The City worked with engineering consultant AMEC to develop a TMDL Action Plan that demonstrates how the City will work to comply with the 5% reduction in Pollutants of Concern. A copy of the report is provided in Appendix B.
- Illicit Discharge Procedures – In PY1 the City reviewed the existing Illicit Discharge Detection and Elimination Manual and determined it required updating based on changes within the organization and with the adoption of the new stormwater management ordinance. This work was completed in PY2. A copy of the document is provided in Appendix E.
- Construction Site Runoff Procedures – In PY2 the City developed a Construction Site Runoff Manual that outlines how the City manages construction site runoff controls. A copy of the draft plan is included in Appendix G.
- Training Schedule and Program – The City finalized training program is provided in Appendix K.

- Implementation of the SWPPP – In PY2 the City installed two new facilities at the Property Yard that assist with managing used oil in an easier way, which will reduce the likelihood of future oil spills.

Please note that the Standard Operating Procedure items requested by Section II B. 6. a. for Good Housekeeping are not included in this report because they were provided in a previous annual report. This was done to keep the report pages and file size down. The City's SOP are for landscaping, storm drain cleaning, vehicle and equipment maintenance, vehicle and equipment washing, and fueling. These documents can be made available upon request.

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.
Civil Engineer

Certification Statement and Requirements

As required by 9VAC25-870-370 B, all reports required by state permits, and other information requested by the board shall be signed by a responsible official or by a duly authorized representative of that person. A responsible official is:

1. For a corporation: by a responsible corporate officer. For the purpose of this section, a responsible corporate officer means: (i) a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy-making or decision-making functions for the corporation, or (ii) the manager of one or more manufacturing, production, or operating facilities, provided the manager is authorized to make management decisions that govern the operation of the regulated facility, including having the explicit or implicit duty of making major capital investment recommendations, and initiating and directing other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; the manager can ensure that the necessary systems are established or actions taken to gather complete and accurate information for state permit application requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures;
2. For a partnership or sole proprietorship: by a general partner or the proprietor, respectively; or
3. For a municipality, state, federal, or other public agency: by either a principal executive officer or ranking elected official. For purposes of this section, a principal executive officer of a federal agency includes (i) the chief executive officer of the agency, or (ii) a senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency.

A person is a duly authorized representative only if:

1. The authorization is made in writing by a person described above;
2. The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company. A duly authorized representative may thus be either a named individual or any individual occupying a named position; and
3. The written authorization is submitted to the department.

CERTIFICATION

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.


Responsible Official Signature


Date

VAR040065 City of Falls Church
Permit Number MS4 Name



Municipal Separate Storm Sewer System
Program Plan
Permit Number VAR040065

Annual Report
Permit Year Two

October 1, 2015

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

CITY OF FALLS CHURCH

CITY COUNCIL MEMBERS

David Tarter - Mayor
Nader Baroukh
Marybeth Connelly
Phil Duncan
Karen Oliver
David F. Snyder
Dan Sze

CITY MANAGER

F. Wyatt Shields

REPORT PREPARED AND COMPILED BY:

DEPARTMENT OF PUBLIC WORKS
Jason Widstrom, Principal Engineer

CONTRIBUTING AGENCIES AND ORGANIZATIONS:

DEVELOPMENT SERVICES
RECREATION AND PARKS
OFFICE OF COMMUNICATIONS

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I. INTRODUCTION

On July 8, 2013, the City of Falls Church received authorization to operate its small municipal separate storm sewer system (MS4) under a Virginia Pollutant Discharge Elimination System (VPDES) general permit. The 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 and gives a look forward to a new MS4 Program Plan, which is included as Appendix A.

The City of Falls Church is required to submit an annual report to remain in compliance with the VPDES 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 Minimum Control Measures (MCM) identified in the City's MS4 Program Plan. Tasks required by the permit in Permit Year Two (PY2) and contained in this annual report are annotated with a BMP shown in italics, for example (*BMP A*), and each corresponds with the MS4 Program Plan. This report places an emphasis on the accomplishments made in PY2, 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. ADMINISTRATION

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 best management practices. The process is ongoing from one permit year to the next.

In PY2, the City recommends the amended MS4 Program Plan to address changes in City's practices. They are as follows:

MCM#1 BMP B, publish one article in *The Environment* newsletter, to be removed from the Education and Outreach Program due to cost and a lack of effectiveness. The City will likely continue this effort outside the MS4 Program; however, it will only be directly emailed to residents that have signed up for the newsletter. At this time the distribution is 135 residents.

The City would like to replace the above BMP with a current, ongoing commitment as part of the Northern Virginia Clean Water Partners. Members of this group pay for an advertising campaign targeting the region's high-

priority water quality concerns. Prior years have proven to be successful in reaching beyond 20% of our target audience.

MCM#6 BMP B was also updated to reflect the final version of the City's Good Housekeeping Training Program. The City will continue to conduct at least one event a year but will look for opportunities for training more frequently but on a less formal basis. This is consistent with the conditions of the MS4 Permit.

Clarifications and Other Changes

As required by Section I C of the General Permit, this annual report includes 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. No other action plan is provided because the City has no other TMDLs with a Waste Load Allocation.

Unless specified otherwise in this report, the City will continue to undertake the activities outlined in the current MS4 Program Plan next year.

There were no changes to the City's roles and responsibilities in PY2. 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. The City's Public Education and Outreach Table included in Appendix C shows our current and future activities for the current permit cycle.

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 PY2. Among these are the following:

Watershed and Floodplain Awareness Month – The City Mayor proclaimed May 2015 "Watershed Awareness Month". The Director of Public Works read an announcement outlining the importance of watershed protection and outlining various activities sponsored by the City in celebration of Watershed Awareness Month. The Mayor's proclamation is provided in Appendix C.

Local Newspapers (MCM#1 *BMP A*) – DPW staff placed three separate articles on watershed protection in the *Falls Church News-Press* (total circulation of 10,000 in the greater Falls Church area), in PY2. Each article is provided in Appendix C.

Local Newsletters (MCM#1 *BMP B*) – DPW publishes a semi-annual online newsletter, *The Falls Church Environment*, to highlight environmental issues that impact Falls Church City residents. In PY2 it was converted from paper copy to electronic format and distributed to 135 email addresses that signed up to receive it. The Fall 2014 edition contained an article related to watershed protection and water quality. A copy of the article can be found in Appendix C.

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 webpages. The new webpages 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. Select material is provided in Spanish. All of the materials can be found using our shortcut link, <http://www.fallschurchva.gov/173/Stormwater>. This page was visited 854 times in PY2.

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 686 citizens who hold a dog license. The same publication continued to be made available throughout City Hall and on the City's website in PY2. A copy of the mailer is included in Appendix C.

Citizen engagement (MCM#1 *BMP F*) – 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; however, no citizens took advantage of it for stormwater related complaints in PY2.

Regional Partnership – In PY2, Falls Church continued the partnership with the Northern Virginia Regional Commission (NVRC) and Northern Virginia Clean Water Partners (NVCWP) to produce regional educational materials 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 4,808,970 household impressions (as of 6/30/15), resulting in more than 20%

of our target audience being reached. The final report provided by Comcast is attached in Appendix C. As mentioned above in this report, the City's outreach with the NVCWP will be included as MCM#1 BMP in PY3.

Storm Drain Markers – The Storm Drain Marking Program was initiated by the City in 2003 and has continued through PY2. DPW continues to install/replace markers as needed.

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 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 PY2 the City Council discussed stormwater funding, acceptance of a SLAF grant, and approval of contracts for stormwater projects during work sessions and regular meetings. Additionally the City Council proclaimed May 2015 Watershed and Floodplain Awareness Month. On July 27, 2015 City staff presented the first annual report for the Stormwater Utility and the City's draft TMDL Action Plan. A list of the City Council's meetings and above mentioned reports are provided in Appendix D.

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; however, no citizens took advantage of it for stormwater related complaints in PY2.

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 agendas for the one meeting held in PY2 that pertaining to the MS4 Program Plan is provided in Appendix D.

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 six habitat restoration events in PY2. 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. Approximately 12,000 square feet of

invasive species (English Ivy, Bush Honeysuckle, Wineberry, Multi-flora Rose, Garlic Mustard, and Bamboo) were removed in three City parks. At two of the locations Joe Pye Weed, New York Ironweed, cardinal flower and native ferns, were planted to replace those plants removed.

Neighborhood Tree Program (NTP) (MCM#2 *BMP F*) – 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. Each year the NTP engages approximately 100 volunteers and plants roughly 50 trees. In PY2 the City continued to support the program financially and promote NTP events using staff time and resources.

Promote city-wide clean-up events (MCM#2 *BMP F*) – Each year the City holds two clean-up events (Fall 2014 and Spring 2015). In PY2 the City had 84 volunteers that picked up a total of 27 bags of recyclables and 48 bags of trash. More information on the City’s program can be found here:
<http://www.fallschurchva.gov/940/Environmental-Volunteer-Opportunities>

Provide MS4 Plan on City website and in hard copy at City Hall and Library (MCM#2 *BMP G*) – Photographs showing the hard copies are provided in Appendix D.

Public Education and Outreach Plan (MCM#2 *BMP H*) – The City’s Public Education and Outreach Table is included in Appendix C. 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 PY2, the City was most successful with its advertising in the local paper and through the Northern Virginia Clean Waters Partners ad campaign.

Rain Barrel Workshops – In cooperation with Arlington County, Arlingtonians for a Clean Environment, Fairfax County, and Northern Virginia Soil and Water Conservation District, City of Alexandria, and the Reston Association, the City participated in several “Build-your-own” workshops and distribution events.

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. The City exercised the illicit discharge prohibition code language in six notices of violation during PY2. Each incident was addressed and corrective measures taken.

In an effort to limit illicit discharges, each year the City of Falls Church proactively performs activities to target specific audiences. During PY2 the City did so in the following ways:

Citizen engagement (MCM#3 *BMP A*) – 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; however, no citizens took advantage of it for stormwater related complaints in PY2.

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.

Notification of Interconnection (MCM#3 *BMP C*) – This was not performed in PY2 because there were no changes to outfalls in the City's stormwater conveyance system.

IDDE Program (MCM#3 *BMP D*) – The City currently has an Illicit Discharge Detection and Elimination (IDDE) Program. In PY1 the City began reviewing the document with an eye to comply with the new General Permit requirements. The City's engineering consultant GKY and Associates found the document needed to be updated and recommended a complete revision to streamline it. In PY2 the IDDE Standard Operating Procedures Manual, or simply the IDDE Manual, was finalized as our main program document. An abbreviated Spill Response SOP is included in the manual and has been circulated to City staff for streamlined reporting. The new manual is attached as Appendix E. Additionally, by the end of PY3 the City hopes to combine elements of the construction site stormwater runoff control program, post-construction, and illicit discharge program into a single document called the Falls Church Public Facilities Manual.

Streamwalk (MCM#3 *BMP D*) – Each year DPW staff performs a streamwalk to locate, inspect and characterize the outfalls in the City's streams. The

process was first performed in 2007 as a pilot program to monitor, investigate and correct illicit discharges in the City. The methodology used in the initial baseline and outlined in the manual, “Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments” by the Center for Watershed Protection (CWP), was used during the PY2 assessment.

Of the 32 outfalls located and characterized in the June 2015 streamwalk five demonstrated potential and one suspected illicit discharges. 26 outfalls were unlikely to have an illicit discharge. All outfalls with flow were screened for odor, pH, and temperature. Further screening is underway to confirm illicit discharge from the one suspected outfall. A summary outfall report is provided in Appendix F.

In PY2 the City conducted annual outfall investigations and continued our illicit discharge detection and elimination program. As follow-up to testing performed in 2013 and PY1 annual outfall monitoring City staff were watchful for illicit discharges in specific areas. IDDE violation notices were delivered to five businesses during PY2 and one additional case was opened and is still under investigation.

Illicit discharge investigations were conducted on eight occasions for new sites in PY2, up from four in PY1. A summary of these including date of suspected discharge, how the investigation was resolved, the resolution, and the date closed is included in Appendix F. Note that case 15_001 and 15_005 resulted in suspicion of illicit discharge but no proof of violations; a case is already open in PY3 for this property and dialogue is ongoing with the property owner regarding changes to on-site business practices.

Targeted Outreach (MCM#3 BMP E) – In PY2, 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 C.

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 update.

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 (ESC) 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 PY3 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.

In PY2, City staff oversaw 66 active construction sites with a land disturbance plans totaling 26.67 acres. 1609 inspections were logged in the Erosion and Sediment Control Inspection Database. The City provided 24 written warnings, and issued 8 Notice to Complies during the last year. The most common issues were the improper removal of silt fencing and failed construction entrances, both which resulted in heavy sediment on the street. Compliance was typically reached using verbal and written warnings; however, there was one instance where a fine was issued.

Construction site SOP (MCM#4 *BMP B*) – The City developed a Construction Site Stormwater Runoff Control Program Operating Procedure document in PY2. A copy is provided as Appendix G. The City will incorporate this document into a single document called the Falls Church Stormwater Management Handbook in PY3.

Citizen engagement (MCM#4 *BMP C*) – On May 7, 2014 the City's Request Tracker on the 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 stormwater related complaints in PY2. We did however receive several emails and phone calls from residents concerning erosion and sediment control on single-family home construction sites.

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.

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. A copy of the VSMP application package can be made available if needed. By the end of PY3 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. Where required by City Code, stormwater Best Management Practice (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 MS 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 BMPs are provided in Appendix H.

In PY2, City staff oversaw 36 new land disturbance plans totaling 8.02 acres. Six new BMPs came online during PY2. Four facilities treating 2.11 acres drain to Tripp's Run (PL-26) and two facilities treat 1.92 acres draining to Four Mile Run (PL-25). The City annexed land containing a middle and high school complex including nine BMPs draining to Pimmit Run (PL-24). City BMP records were improved in PY2 to inventory multiple facilities on individual properties separately; several sites previously were listed once in City records but contained multiple BMPs. These factors increased the City's BMP inventory to 143 facilities in PY2, up from 106 in PY1.

Stormwater Facility Inspections (MCM#5 *BMP D*) – In PY2 the City continued inspections of stormwater BMP/facility assessments and enforcement actions. The inspection team, comprised of two City inspectors, conducted 34 BMP inspections during the past year. In PY2 the City inspected all City-owned and operated facilities. A memo from the lead inspector is provided in Appendix I.

BMP Inspection Policies and Procedures (MCM#5 *BMP F*) – Efforts to revise the Stormwater Management Facility Inspection Standard Operating Procedure Manual is nearly complete. A copy of the revised SOP manual is included in Appendix I. Once officially finalized the revised SOP will be implemented and guide the BMP inspection program in PY3.

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 PY2. 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 PY2 to achieve this goal:

Street Sweeping (MCM#6 BMP A) – The City continued its street-sweeping contract in PY2. 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 approximately 231.7 tons of sediment and debris being removed from the streets. A copy of the City’s street sweeping logs is provided in Appendix J.

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 Public Works and maintenance crews with Recreation and Parks received Illicit Discharge awareness training in June of 2015. A second training was held shortly after to get employees that missed the first event. At both events a MS PowerPoint slideshow was shown to staff and followed with discussion. The presentation and a list of attendees are provided in Appendix K.

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

The City has three 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 final Training Schedule and Program is provided in Appendix K. 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. Our consultant identified two sites as potentially meeting the criteria: the City Property Yard and the City's Remote Storage Yard. The City's consultant GKY then further prepared a SWPPP for the two sites. A copy of the site visit report and draft SWPPP was provided with last year's annual report.

In PY2, DPW staff began implementing recommendations from the SWPPP. In summer of 2015 the City purchased and installed an above-ground used oil containment unit and a new hazardous waste shed. Pictures of these new facilities are included in Appendix L.

Additionally, the City developed a site plan of the Property Yard to install a new 50'x60' Salt and Sand Shed. The City issued an IFB and had two bids. Unfortunately the cost of site work and the structure were more than three times the budget. The City is currently redesigning the facility and hopes to rebid the project this winter for installation in the spring.

(MCM#6 *BMP F, BMP G*) No updates were required for these items in PY2.