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# Municipal Separate Storm Sewer System (MS4) 2023-2028 Permit Program Plan

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**MS4 Permit #VAR040063**

(Effective date of the permit November 1, 2023)

City of Manassas  
Department of Engineering  
Stormwater Division  
9027 Center Street Manassas, Virginia 20110

May, 2024



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## MS4 PROGRAM PLAN CERTIFICATION

As required by the MS4 General Permit, Part IV. K. 4.

"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."

Print Name: Lance Kilby

Title: CITY ENGINEER

Signature: J. H. Hill

Date: 4/29/24

## INTRODUCTION

The City of Manassas is an incorporated municipality located about 32 miles west of Washington, D.C., encompassing about 10 square miles. The City is authorized to discharge stormwater through its municipal separate storm sewer system (MS4) under the Virginia Pollutant Discharge Elimination System (VPDES) General Permit #VAR040063 (MS4 Permit). MS4s are conveyances, or a system of conveyances, owned and operated by government entities that are designed or used in the collection of stormwater runoff and are not part of a combined sewer or a Publicly Owned Treatment Works (POTW). Discharges from MS4s are classified as “point sources of pollutants” (a single indefinable source of pollution) as a result of 1987 modifications to the federal Clean Water Act (CWA).

The City of Manassas drains to the Occoquan River, and ultimately to the Chesapeake Bay. It is composed of primarily urban mixed-use land development and surrounded by Prince William County and Manassas Park. The City lies along the crest of several hydrological divides; there are no “upstream” neighbors, only downstream ones. MS4 infrastructure lies within the following four HUC 12 watersheds: Lake Jackson-Occoquan River, Lower Bull Run, Middle Bull Run, and Rocky Branch-Broad Run – as shown on the image below.

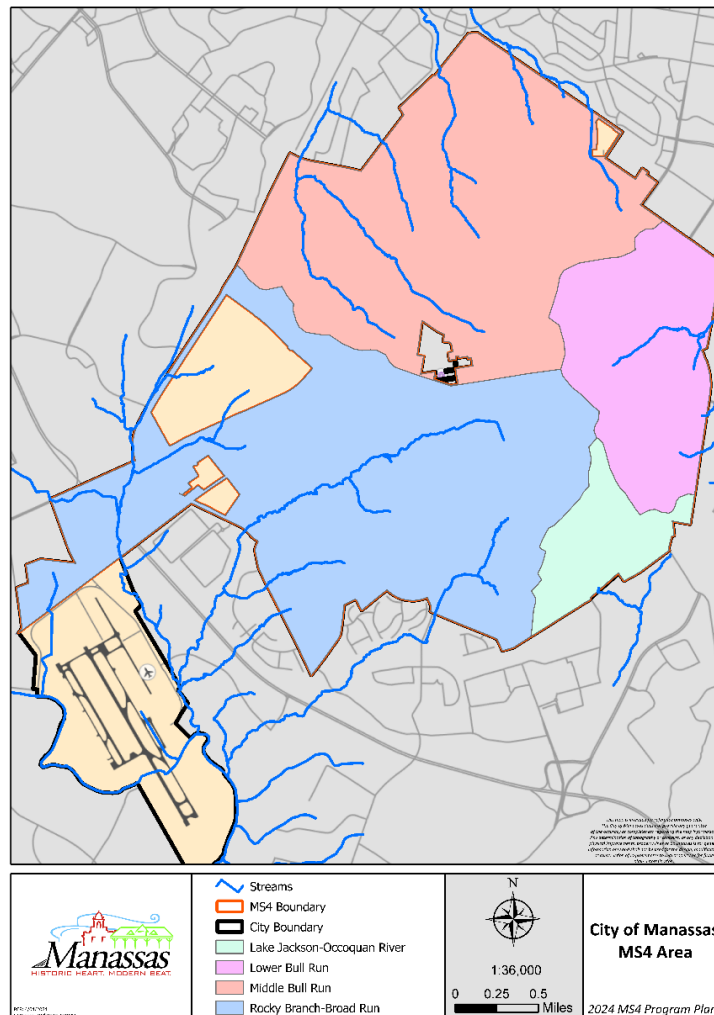


Figure 1: City of Manassas MS4 Area Map



## Purpose

In accordance with the MS4 Permit, this document - the City of Manassas' MS4 Program Plan - describes all programs and actions taken by the City to ensure compliance with the MS4 Permit. This plan is a single document outlining policies, ordinances, strategies, checklists, and other documents detailing the various programs the City establishes to meet permit requirements. This program has been designed to reduce the discharge of pollutants to the "maximum extent practicable."

## MS4 Permit Overview

The MS4 Permit is the legal authority upon which City VPDES compliance is determined. Failure to meet the conditions and requirements contained in the MS4 General Permit can lead to State or Federal authority and compliance actions. Under the CWA, third parties may also utilize citizens' lawsuits to ensure compliance.

The MS4 General Permit has a five-year lifespan. As such, the City must reapply for coverage under a renewed general permit and agree to comply with the renewed general permit conditions. The City's first permit cycle was from 2013 – 2018. The second permit cycle was from 2018 – 2023. The current applicable MS4 Permit became effective November 1, 2023 and will expire on October 31, 2028. The City has continued to implement both structural and non-structural best management practices (BMPs) to comply with the conditions of each successive permit.

The MS4 General Permit is divided into the following four (4); please note that this Program Plan addresses Parts I, II, and III – as described below.

- Part I: Discharge Authorization and Special Conditions – contains MS4 Program Plan and Annual Reporting requirements (Programmatic BMPs), as well as the requirements for each of the following six (6) Minimum Control Measures (MCMs) that include best management practices (BMPs) to prevent or reduce water pollution:
  - MCM 1 – Public Education and Outreach
  - MCM 2 – Public Involvement and Participation
  - MCM 3 – Illicit Discharge Detection and Elimination
  - MCM 4 – Construction Site Stormwater Runoff Control
  - MCM 5 – Post-Construction Stormwater Management for New Development and Development on Prior Developed Lands
  - MCM 6 – Pollution Prevention and Good Housekeeping for Facilities Owned and Operated by the City
  
- Part II: Total Maximum Daily Load (TMDL) Special Conditions – contains special conditions specific to how the City must address discharges to impaired waters that have a TMDL. The MS4 Permit contains two special conditions, both of which apply to the City. The first is the Chesapeake Bay TMDL Special Condition, which applies to all MS4s discharges in the Chesapeake Bay watershed. The second establishes the MS4 Permit's special conditions for addressing discharges to local impaired waters with an approved TMDL. For the City, this includes a local TMDL for the Bull Run watershed, which is impaired for Sediment and Bacteria.



- Part III: DEQ BMP Warehouse Reporting – describes the process for permittees to upload new “BMPs” and inspection dates of all current “BMPs” to the DEQ BMP Warehouse. For the purposes of the MS4 Permit, “BMP” or “best management practices” means practices that achieve quantifiable nitrogen, phosphorus, or total suspended solids reductions, including stormwater management facilities, ecosystem restoration projects, annual practices, and other practices approved by the department for reducing nitrogen, phosphorus, and total suspended solids pollutants. This MS4 Program Plan covers the reporting requirements under MCM #5 – Task 5D.
- Part IV: Conditions Applicable to all State and VPDES Permits of the MS4 General Permit – contains standard VPDES permit conditions including, but not limited to, records retention, reporting of unauthorized discharges and unusual discharges, signatory requirements, certification requirements, and authorization for DEQ entry to conduct inspections. While not specifically covered in this MS4 Program Plan, the City will adhere to all requirements of Part IV.

### Key Roles and Responsibilities in MS4 Permit Implementation

The City manages stormwater and meets MS4 Permit requirements through a comprehensive program, and this MS4 Program Plan is the link between several City programs and the MS4 Permit conditions. As such, many City departments and agencies share responsibility in ensuring that their individual department’s activities and actions are compliant with the MS4 Permit requirements, as outlined below in **Table 1**. This MS4 Program Plan identifies the roles, responsibilities, and efforts undertaken to comply with MS4 General Permit conditions.

**Table 1. Department-Specific MS4 Program Plan Implementation Role & Applicable MCM**

Department / Agency / Partnership	MS4 Program Plan Implementation Role	Applicable MCM/Special Condition
Department of Engineering & Stormwater Division	<p>Director of Engineering is the VA Stormwater Management Program (VSMP) Administrator and Duly Authorized Signatory Authority</p> <ul style="list-style-type: none"> <li>• Oversees administration of the City MS4 program, coordinates program implementation, and prepares annual reports submitted to DEQ detailing program accomplishments and compliance with the MS4 permit.</li> <li>• Coordinates public education, outreach, and involvement opportunities related to the MS4 program.</li> <li>• Implements the illicit discharge and detection elimination program.</li> <li>• Maintains databases for tracking inventory, inspections, maintenance, of stormwater management facilities (SWMFs).</li> <li>• Implements City-wide illicit discharge and pollution prevention/good housekeeping training program.</li> <li>• Performs Erosion and Sediment Control plan review and construction inspections.</li> <li>• Performs Stormwater Management plan review and construction SWPPP inspections.</li> <li>• Ensures implantation and compliance of TMDL goals.</li> </ul>	ALL
Department of Community Development	<ul style="list-style-type: none"> <li>• Administers construction plan review and permitting processes.</li> <li>• Ensures City land disturbing permits are not issued until all proper forms and requirements are approved.</li> </ul>	MCM 4 & 5
Department of Public Works	<ul style="list-style-type: none"> <li>• Performs routine maintenance and inspections of all City owned ponds to ensure proper performance.</li> <li>• Manages the Refuse and Recycling programs which works to reduce the volume of street litter and hazardous household materials left at curbside through contracted curbside solid waste collection and through the Keep Manassas Beautiful litter prevention program, and regularly scheduled household hazardous waste and electronics drop off days.</li> </ul>	MCM 3, 5, & 6
Department of Utilities	<ul style="list-style-type: none"> <li>• Performs CCTVing services, providing year-round inspections and maintenance to all stormwater inlets and underground pipe systems.</li> <li>• Assists with SWMF non-routine maintenance and the IDDE process as needed.</li> </ul>	MCM 3 & 5



**Table 1. Department-Specific MS4 Program Plan Implementation Role & Applicable MCM**

Department / Agency / Partnership	MS4 Program Plan Implementation Role	Applicable MCM/Special Condition
Enterprise Geographic Information System (GIS) Group	<ul style="list-style-type: none"> <li>Maintains, coordinates, and distributes GIS data and its related technology solutions for use in implementing this MS4 Program Plan</li> <li>Develops and maintains the stormwater database, maps, public map viewers, and field applications to collect and analyze illicit discharge data, drainage complaints, stormwater infrastructure inspections, and construction inspection.</li> </ul>	MCM 3, 4, & 5
Department of Fire Marshall	<ul style="list-style-type: none"> <li>Provides emergency response coordination for large and hazardous spills, and enforcement, if required.</li> </ul>	MCM 3
Parks, Culture, & Recreation	<ul style="list-style-type: none"> <li>Manages various park and recreations facilities throughout the City – fertilize playfields, chlorinate swimming pools, keep parks that containing high visitor and pet-use clean.</li> </ul>	MCM 1, 2, & 6
Manassas City Public Schools	<ul style="list-style-type: none"> <li>Manages various school facilities throughout the City (schools are included in our MS4 Permit Area).</li> <li>Maintains a series of elementary, middle-school, and high-school sites and building complexes, including large buildings, storage areas, parking lots, bus parking, fertilized turf, chemical storage, ballfields, and the educational lives of thousands of children.</li> </ul>	MCM 1 & 6
Communications Team	<ul style="list-style-type: none"> <li>Manages a comprehensive communications program to keep residents, business owners, visitors, and the media informed of municipal services and activities.</li> <li>Publishes City’s monthly newsletter and administers the City’s social media platforms.</li> </ul>	MCM 1 & 2
City Attorney	<ul style="list-style-type: none"> <li>Provides legal assistance in the enforcement of City ordinances utilized to implement the MS4 Program Plan.</li> <li>Reviews contracts and other legal documents to ensure legal documents are consistent with the MS4 Program Plan.</li> </ul>	All
Northern Virginia Clean Water Partners (NVCWP)	<ul style="list-style-type: none"> <li>Membership provides the City with diverse educational outreach materials that can be customized</li> <li>Example: <i>Only Rain Down the Drain!</i> Regional Stormwater Education Initiative:               <ul style="list-style-type: none"> <li>Allowed the City to pool local outreach dollars to collectively target pollution-causing behaviors using a multi-media approach for greater impact at less cost and effort (e.g. television ads, radio ads, etc.)</li> </ul> </li> </ul>	MCM 1 & 2

**Table 1. Department-Specific MS4 Program Plan Implementation Role & Applicable MCM**

Department / Agency / Partnership	MS4 Program Plan Implementation Role	Applicable MCM/Special Condition
Prince William County Soil and Water Conservation District (PWCSWCD) – Memorandum of Understanding in development (May 2024)	<ul style="list-style-type: none"> <li>Provides additional education and community involvement opportunities, such as stream clean-ups.</li> <li>Administers the Virginia Conservation Assistance Program (VCAP) program. The City promotes VCAP as part of its public involvement program.</li> </ul>	MCM 1 & 2
Private Consultants & On-Call Contractors	<ul style="list-style-type: none"> <li>Assist with the following but are not limited to:               <ul style="list-style-type: none"> <li>Writing reports (e.g. TMDL Action Plans)</li> <li>Pond Restoration Designs</li> <li>Stormwater Facility Inspections and Non-Routine Maintenance</li> <li>Etc.</li> </ul> </li> </ul>	ALL

Legal Authority

The City of Manassas will maintain and utilize its legal authority, as summarized below in **Table 2**, authorized by the Commonwealth of Virginia to control discharges to and from the MS4 in the manner established by the specific requirements of this state permit. The legal authority shall enable the permittee to: control the contribution of pollutants to its MS4; prohibit illicit discharges; control the discharge of spills and the dumping or disposal of materials other than stormwater; require compliance with conditions in ordinances, permits, and contracts; and carry out all inspections necessary to determine compliance and noncompliance with permit conditions.

Legal Authority	Code Summary	Relationship to MS4 Permit
City Code, Chapter 118 Article IV, Division 5, Subdivision II(A), Sec. 118-370	Unlawful Discharge to the Stormwater System and Waters of the City <ul style="list-style-type: none"> <li>Illicit discharge ordinance</li> </ul>	MCM 3 & 6
City Code, Chapter 58 Article III & IV	ESC & SWM Ordinance <ul style="list-style-type: none"> <li>SWMF design, maintenance, &amp; inspection requirements</li> <li>Notice to correct violations as well as penalties for any violations of subdivision</li> </ul>	MCM 4 & 5
City Code, Chapter 18 Article I, Sec. 18-8	Animals <ul style="list-style-type: none"> <li>Unlawful to allow any pet to urinate or defecate on any public property or the private property of another without consent</li> </ul>	MCM 1



Legal Authority	Code Summary	Relationship to MS4 Permit
City Code, Chapter 66	Floodplain Ordinance <ul style="list-style-type: none"><li>• Currently being updated in conjunction with PWC's floodplain study</li></ul>	MCM 4 & 5
Design and Construction Standards Manual	<u>DCSM</u> <ul style="list-style-type: none"><li>• Letters to industry and technical memos – site plan process, erosion control requirements, storm drain systems, etc.</li></ul>	MCM 4 & 5

## MS4 PROGRAM PLAN IMPLEMENTATION

The MS4 Program Plan describes the City of Manassas’s comprehensive program to manage the quality of stormwater runoff discharged from the MS4. The City has categorized this section of the MS4 Program Plan into the following sections with best management practices (BMPs) to address all permit requirements.

- Programmatic BMPs: MS4 Program Plan and annual reporting
- MCM #1. Public education and outreach on stormwater impacts
- MCM #2. Public involvement and participation
- MCM #3. Illicit discharge detection and elimination
- MCM #4. Construction site stormwater runoff control
- MCM #5. Post-construction runoff control for development and redevelopment
- MCM #6. Good housekeeping and pollution prevention for municipal operations
- Special Conditions for TMDLs – Chesapeake Bay and Local TMDL Tasks
- DEQ BMP Warehouse Reporting

### Programmatic BMPs

#### Programmatic Task 1 – Develop an MS4 Program Plan

- **Description:**  
The City will create a program plan that specifies what BMPs will be implemented to achieve the minimum control standards.
- **Strategies, Objectives, & Measurable Goals**  
Final documentation of the program plan will address the challenges and ongoing best management practices regarding stormwater runoff and keeping it as clean as possible.
- **Responsible Departments/Employees:**
  - Engineering – Stormwater
- **Documents or Standard Operating Procedures (SOPs) Associated with Task (Completed Unless Noted Otherwise):**
  - MS4 General Permit
- **Status/Schedule of Implementation:**
  - The MS4 Program Plan shall be completed no later than six (6) months after the effective date of the permit (6 months from November 1, 2023, or May 1, 2024).
- **Annual Reporting Requirements:**
  - Review and update the program plan as needed each year.

### Programmatic Task 2 – Develop and Submit Annual Reports to DEQ

- **Description:**  
Develop an MS4 Annual Report that summarizes permit compliance – July 1 through June 30.
- **Strategies, Objectives, & Measurable Goals**  
This will ensure all program BMPs are achieving their objectives and goals, and identify any inefficiencies that need to be corrected or changed.
- **Responsible Departments/Employees:**
  - Engineering – Stormwater
- **Documents or SOPs Associated with Task (Completed Unless Noted Otherwise):**
  - MS4 Program Plan
- **Status/Schedule of Implementation:**
  - The annual report will be submitted to DEQ each year no later than October 1. The report shall cover the previous year from July 1st to June 30<sup>th</sup>, as shown in the table below.

**Table 2: Annual Reporting Schedule**

Permit Year (PY)	PY Reporting Period		Annual Report Due Date
	<i>Begins</i>	<i>Ends</i>	
PY1	July 1, 2023	June 30, 2024	October 1, 2024
PY2	July 1, 2024	June 30, 2025	October 1, 2025
PY3	July 1, 2025	June 30, 2026	October 1, 2026
PY4	July 1, 2026	June 30, 2027	October 1, 2027
PY5	July 1, 2027	June 30, 2028	October 1, 2028

- **Annual Reporting Requirements:**
  - N/A

### Minimum Control Measure #1: Education & Outreach on Stormwater Impacts

The City shall implement public education and outreach programs designed to:

- Increase the public’s knowledge of how to reduce stormwater pollution, placing priority on reducing impacts to impaired waters and other local water pollution concerns;
- Increase the public’s knowledge of hazards associated with illegal discharges and improper disposal of waste, including pertinent legal implications; and
- Implement a diverse program with strategies that are targeted toward individuals or groups most likely to have significant stormwater impacts.

### MCM TASK 1A – Develop, Implement, and Track General Stormwater Public Education and Outreach Program

- **Description:**

The City will develop and implement strategies and find new opportunities to educate the public on stormwater matters. These strategies will increase the public's knowledge of how to reduce stormwater pollution, placing priority on reducing impacts to impaired waters and other local water pollution concerns; increase the public's knowledge of hazards associated with illegal discharges and improper disposal of waste, including pertinent legal implications; and implement a diverse program with strategies that are targeted toward individuals or groups most likely to have significant stormwater impacts. Education materials and events will be tracked in order to analyze what strategies work best.

- **Strategies, Objectives, & Measurable Goals:**

Working together to educate and learn about stormwater management will help mitigate pollution through analyzing and implementing stormwater BMPs and thus help us achieve our ultimate goal of protecting local streams and the Chesapeake Bay.

The City must use a minimum of two (2) of the following strategies annually to educate the public about these three (3) water quality issues; however, the City plans to use each strategy listed in the table below, including keeping an updated City website to help educate the public where all written materials (e.g. all brochures) will also be housed. New this permit cycle, the City will also include how climate change affects stormwater within presentations as well as new written material.

**Table 3: Strategies for Public Education & Outreach**

Strategies	Examples (not inclusive or limited to)
Traditional written materials	Informational brochures, newsletters, fact sheets, utility bill inserts, or recreational guides for targeted groups of citizens
Alternative materials	Bumper stickers, refrigerator magnets, t-shirts, or drink koozies
Signage	Temporary or permanent signage in public places or facilities, vehicle signage, bill boards, or storm drain stenciling
Media materials	Information disseminated through electronic media, radio, televisions, movie theater, newspaper, or GIS story maps
Speaking engagements	Presentations to school, church, industry, trade, special interest, or community groups
Curriculum materials	Materials developed for school-aged children, students at local colleges or universities, or extension classes offered to local citizens

Training materials	Materials developed to disseminate during workshops offered to local citizens, trade organization, or industrial officials
Public education activities	Booth at community fair and/or Farmers Markets, demonstration of stormwater control projects, presentation of stormwater materials to schools to meet applicable education Standards of Learning curriculum requirements, or watershed walks
Public meetings	Public meetings on proposed community stormwater management retrofits, green infrastructure redevelopment, ecosystem restoration projects, TMDL development, climate change's effects on stormwater management, voluntary residential low impact development, or other stormwater issues

- **Responsible Departments/Employees:**
  - Engineering – Stormwater
  - Public Works
  - Community Development – Parks, Culture, & Recreation
  
- **Documents or SOPs Associated with Task (Completed Unless Noted Otherwise):**
  - Prince William County Soil and Water Conservation District (PWCSWCD) – Memorandum of Understanding (in development as of May 2024)
  - City of Manassas Farmers Market Sign-up
  - NVRC Memorandum of Understanding
  - 2023 NVRC Clean Water Partner Annual Summary
  - Parks, Culture, & Recreation Annual Stormwater Summary
  - City of Manassas Educational Material
    - IDDE Flyer (English and Spanish)
    - City of Manassas Bulk Trash Postcard
    - Composting Postcard
    - Curbside Debris Flyer
    - No Mow Sign Dean Park
    - Yard Waste Bulk Pickup Flyer
    - Dog Park Rules sign
    - Park Rules 24x30 sign
    - Clean the Bay Day 2023 Flyer
    - 2020 Sediment Flyer
    - 2020 Stormwater at Construction Sites Brochure
    - General SW Management Flyer
    - Grass and Pesticides Brochure
    - Landscaping Brochure
    - Only Rain Down the Drain Flyer (English and Spanish)
    - City Website with information on:
      - General stormwater knowledge

- General MS4 information (annual reports, permits, action plans, program ordinances)
  - Stormwater projects
  - Stormwater tips for business (cleaning spills, dumpsters, grease & oil, landscaping, preventing leaks & spills, and works site)
  - Stormwater tips for residents (vehicle & garage, swimming pool & spa, septic system use & maintenance, pet care, lawn & garden, home repair and improvement)
  - Salt management strategies
- **Status/Schedule of Implementation:**
    - Ongoing – will be completed annually to update high-priority issues and/or education and outreach materials and activities.
  - **Annual Reporting Requirements:**
    - A description of public education and outreach activities conducted - that also included education regarding climate change.
    - The City will keep track of each event/distributed information in a table similar to the one below:

**Table 4: Example Table to Record Education Materials & Outreach**

Name of Exhibit (e.g. signage, brochure) or Event (e.g. public meeting)	Exhibit Type	Location	Date	# of Participants/# of Views on Social Media

**MCM TASK 1B – Identify and Educate the Public about High-Priority Issues**

- **Description:**

The City has identified three (3) high-priority stormwater issues that meet the goals of educating the public in accordance with Part I E 1. High-priority issues may include the following examples: Chesapeake Bay nutrients, pet wastes, local receiving water impairments, TMDLs, high-quality receiving waters, litter control, BMP maintenance, anti-icing and deicing agent application, planned green infrastructure redevelopment, planned ecosystem restoration projects, and illicit discharges from commercial sites.
- **Strategies, Objectives, & Measurable Goals:**

Based off past records of citizen complaints, illicit discharge reports, water quality reports, and observations from investigations and the City has identified the three (3) high-priority water quality issues, as shown in **Table 5**, that contribute to the impairments of stormwater.



**Table 5: Selection of High Priority Water Quality Issues**

<b>Water Quality Issue #1:</b>	Illicit Discharge and Illegal Dumping from Residents
<b>Target Audience:</b>	Students, Residents, and Business Owners
<p>The City has identified litter and hazardous waste as problem pollutants through field observations and citizen complaints. Improper discharges and dumping can result in the release of toxic chemicals and bacteria to the waters of Virginia. This can be mitigated by increasing outreach to students, residents, and businesses on how to prevent pollution and the legal consequences of noncompliance through speaking engagements (e.g. public meetings and classroom presentations) and different traditional written materials (e.g. City Connection). The City’s stormwater website also contains a variety of stormwater information, ranging from better home and garden practices, swimming pool maintenance, taking care of dumpsters, preventing work-related leaks and spills, and the disposal of grease and oil. All city parks also contain signs that state illegal dumping is prohibited (see “Pet Waste and Bacteria TMDL” for more information). All illicit discharges will be tracked – see BMP 3H for details.</p>	
<b>Water Quality Issue #2:</b>	Pet Waste and Bacteria
<b>Target Audience:</b>	Pet Owners
<p>The City has identified litter and hazardous waste as problem pollutants through field observations and citizen complaints. Improper discharges and dumping can result in the release of toxic chemicals and bacteria to the waters of Virginia. This can be mitigated by increasing outreach to students, residents, and businesses on how to prevent pollution and the legal consequences of noncompliance through speaking engagements (e.g. public meetings and classroom presentations) and different traditional written materials (e.g. City Connection). The City’s stormwater website also contains a variety of stormwater information, ranging from better home and garden practices, swimming pool maintenance, taking care of dumpsters, preventing work-related leaks and spills, and the disposal of grease and oil. All city parks also contain signs that state illegal dumping is prohibited (see “Pet Waste and Bacteria TMDL” for more information). All illicit discharges will be tracked – see BMP 3H for details.</p>	
<b>Water Quality Issue #3:</b>	Sediment Pollution
<b>Target Audience:</b>	Construction Workers
<p>Previously, the City identified Chesapeake Bay Nutrients as one of its high-priority water quality issues; however, beginning in 2019, this has been changed in order to be more focused (phosphorus and nitrogen are no longer listed as separate concerns—outside the other parts of this General Permit coverage). Common sources of sediment include stormwater runoff from construction sites. Outreach efforts using traditional written materials (e.g. fact sheets distributed to construction workers during pre-construction meetings) will be utilized. In order to help reduce runoff from these common sources, we want to make sure all construction workers know the importance of keeping our waters clean and how they can help lessen sediment pollution as they work on sites.</p>	

- **Responsible Departments/Employees:**
  - Engineering – Stormwater
  - Public Works
  - Community Development – Parks, Culture, & Recreation
  
- **Documents or SOPs Associated with Task (Completed Unless Noted Otherwise):**
  - City of Manassas Educational Material as listed in MCM TASK 1A
  
- **Status/Schedule of Implementation:**
  - Ongoing – will be completed annually to update high-priority issues and/or education and outreach materials and activities.
  
- **Annual Reporting Requirements:**
  - A list of the high-priority stormwater issues the permittee addressed in the public education and outreach program.
  - A summary of the public education and outreach activities conducted for the report year, including the strategies used to communicate the identified high-priority issues.
  - A description of any changes in high-priority stormwater issues, including strategies used to communicate high-priority stormwater issues or target rationale for any of these changes.

### Minimum Control Measure #2: Education & Outreach on Stormwater Impacts

The permittee shall develop and implement procedures for the following:

- Participate in at least four (4) local activities annually, which will be advertised, tracked, and stored;
- The public to report potential illicit discharges, improper disposal, or spills to the MS4, complaints regarding land disturbing activities, or other potential stormwater pollution concerns;
- The public to provide comments on the permittee’s MS4 program plan;
- Responding to public comments on the permittee’s MS4 program plan; and
- Maintaining documentation of public comments received on the MS4 program and associated MS4 program plan and the permittee’s response.

### MCM TASK 2A – Public Participation Events

- **Description:**

The City will implement at least four (4) environmentally engaging activities throughout each year that are aimed at increasing overall stormwater awareness and education as well as strengthening partnerships. These activities will include a broad range of opportunities for all to be able to participate in to improve water quality and support local restoration and clean-up projects.

- **Strategies, Objectives, & Measurable Goals:**

The City is aiming to increase public participation and create environmental awareness at reducing pollution in order to improve water quality through participation activities. The City strives to participate in at least one school event, one clean up event, one farmers market, and one recycling event, while taking also taking advantage of our partnership activities with the NVRC Clean Water Partners and the Prince William County Soil and Water Conservation District. Below are descriptions of several events and programs that City intends to utilize for this Task each year.

*Keep Manassas Beautiful Programs:* engages and empowers residents, businesses, and community groups to undertake litter clean-ups throughout the year, requiring them to report what they collected and the location.

*Adopta! Programs:* encourages citizens to “adopt” a street, stream, park, ballfield or historic site, and the City provides all materials needed for a clean-up event.

*Clean the Bay Day:* stream clean-up event within a City Park.

*RecycleFest! & Household Hazardous Waste & eWaste Drop-off Days:* where residents can drop off antifreeze, fertilizers, gasoline, glues, motor oil, paint, swimming pool chemicals, electronics, etc.

*Farmers Market:* where Stormwater staff will have a booth with educational material and an EnviroScape® model. The 3D EnviroScape® Watershed education model provides a hands-on, interactive demonstration of the sources and effects of water pollution – and allows you to demonstrate ways to prevent it

*School Events:* where the Stormwater team will attend elementary, middle, and high schools all over the City to present stormwater educational material to the youth through interactive programs, presentation, or demonstrations.

*Virginia Conservation Assistance Program (VCAP)Program (in development):* an urban cost-share program, implemented through our partnership with the PWCS CD, that provides financial incentives and technical and educational assistance to property owners installing eligible stormwater management facility (e.g., bioretention).

- **Responsible Departments/Employees:**

- Engineering – Stormwater
- Public Works
- Community Development – Parks, Culture, & Recreation

- **Documents or SOPs Associated with Task (Completed Unless Noted Otherwise):**

- Parks, Culture, & Recreation Annual Stormwater Summary
- Event Flyers

- Handling Trash at Events SOP
- Park Events Rules
- The following memorandums of understanding, certification, or sign-up with:
  - NVRC
  - PWCSWCD
  - Keep America Beautiful (Manassas)
  - Farmers Market
- **Status/Schedule of Implementation:**
  - Annually evaluate the success of our activities and plan for next year’s activities. **Table 6** provides as an *example* to how we will keep track of public events using previous examples.

**Table 6: Example Table to Record Public Participation Events**

Event	Location	Date	# of Participants

- **Annual Reporting Requirements:**
  - A description of the public involvement activities implemented by the permittee, including any efforts to reach out and engage all economic and ethnic groups.
  - A report of the metric as defined for each activity and an evaluation as to whether or not the activity is beneficial to improving water quality.
  - The name of other MS4 permittees with whom the permittee collaborated in the public involvement opportunities.
  - Evaluation of activities.

**MCM TASK 2B – Develop and Maintain a System to Receive Public Complaints**

- **Description:**

The City of Manassas shall maintain lines of communication for receiving and responding to public questions, concerns, and ideas as well as dispersing information to the public through our website and outreach programs.
- **Strategies, Objectives, & Measurable Goals:**

The City wants to empower citizens to reach out about any questions, concerns, and/or ideas they have regarding stormwater issues. The City will maintain documentation of these communications and complaints through an internal tracking database, and through our current public reporting system, GoGov (citizen request management system). To submit reports through GoGov, citizens either visited the City of Manassas website or the City’s stormwater page through the “Report a Concern” feature or downloaded the City’s GoGov public reporting tool to submit concerns. In addition, since Stormwater Staff contact information is provided on the City’s stormwater website, they receive many calls directly relating to drainage and stormwater issues. Using our ArcGIS platform, the City’s GIS team have created a map that identifies where complaints are located in real time, allowing the City to keep track of hot spot

areas. Our Communications Team also disperses stormwater information through our social media platforms (e.g. Facebook, X, etc.). By making our website easy and accessible to use as well as holding a variety of public participation events, citizens will feel encouraged to speak up and voice their thoughts in regards to stormwater.

- **Responsible Departments/Employees:**
  - Engineering – Stormwater
  - Public Works
  - Communications Team
  
- **Documents or SOPs Associated with Task (Completed Unless Noted Otherwise):**
  - Code Enforcement Division General Inspection & Enforcement Procedures
  - Master Complaint Log
  
- **Status/Schedule of Implementation:**
  - Ongoing.
  
- **Annual Reporting Requirements:**
  - A summary of drainage complaints and stormwater pollution complaints received under the procedures established in Part I E 2 a (1), excluding natural flooding complaints, and how the permittee responded.
  - Table 7 provides as an *example* to how we will keep track of complaints that come in throughout the year.

**Table 7: Complaints for the Year**

Complaint Type	# of Complaints	# Responded To/Evaluated	# Closed
IDDE			
Erosion			
Infrastructure			
Drainage			
Etc.			
TOTAL			

**MCM TASK 2C – Develop and Maintain a System for Receiving Public Input on the MS4 Program Plan**

- **Description:**  
By providing an opportunity for the public to add their input and comments, the City can take advantage of the expertise of residents, learning how we can strengthen community understanding of the program objectives.

- **Strategies, Objectives, & Measurable Goals:**

The City's goal is to solicit public participation and comment through availability of the MS4 program plan. The City's website is currently being redesigned to include more pages that will allow the public to easily view and comment on the current MS4 program plan as well as other pages like "FAQs" where citizen can email the City a question or idea they have about stormwater. Responses will be submitted to the City via the email address that is listed on the City's website ([stormwater@manassasva.com](mailto:stormwater@manassasva.com)), or they can call the phone number listed on the website. These emails will be kept separate, and any input/feedback that requires a response will be responded to within 14 days by one of the three stormwater staff members.

The City's website must include:

- The effective MS4 permit and coverage letter
- The most current MS4 program plan
- The annual report for each year of the term covered by this permit
- The most current Chesapeake Bay TMDL action plan
- The most current Chesapeake Bay TMDL implementation annual status reports for each year of the term covered by this permit
- A mechanism for the public to provide input and complaints
- A mechanism for the public to comment on the MS4 program plan

The city's stormwater page is located at:

[https://www.manassasva.gov/engineering/all\\_about\\_stormwater/index.php](https://www.manassasva.gov/engineering/all_about_stormwater/index.php)

- **Responsible Departments/Employees:**

- Engineering – Stormwater

- **Documents or SOPs Associated with Task (Completed Unless Noted Otherwise):**

- Documents listed above under Strategies, Objectives and Measurable Goals.

- **Status/Schedule of Implementation:**

- Effective date of 2023-2028 permit: November 1, 2023
- MS4 Program Plan Complete by May 1, 2024
- The MS4 program plan and annual reports will be updated annually, with an updated MS4 program plan being posted on our website by November 1 of each year.

- **Annual Reporting Requirements:**

- A summary of any public comments on the MS4 program received and how the permittee responded.
- A webpage address to the permittee's MS4 program and stormwater website.

### Minimum Control Measure #3: Illicit Discharge Detection and Elimination

The permittee shall develop, maintain, and/or perform:

- An updated map of the MS4 owned or operated by the permittee within the 2020 census urban

areas with a population of least 50,000 and any previous decennial census urbanized areas no later than 24 months after the permit effective date; and an outfall information table associated with the MS4 map.

- No later than 24 months after permit issuance, the permittee shall submit to DEQ format file geodatabase or two shapefiles.
- The permittee shall provide written notification to any downstream adjacent MS4 of any known physical interconnection established or discovered after the effective date of this permit.
- The permittee shall prohibit, through ordinance, policy, standard operating procedures, or other legal mechanisms, to the extent allowable under federal, state, or local law, regulations, or ordinances, unauthorized non-stormwater discharges into the MS4.
- The permittee shall maintain, implement, and enforce illicit discharge detection and elimination (IDDE) written procedures designed to detect, identify, and address unauthorized non-stormwater discharges.
- Dry Weather Screening
- Illicit Discharge Tracking

### MCM TASK 3A – MS4 Map

- **Description:**

The City shall maintain an updated map of the MS4 owned or operated by the permittee within the 2020 census urban areas with a population of least 50,000 and any previous decennial census urbanized area that includes:

- MS4 outfalls discharging to surface waters
- A unique identifier for each mapped item required in Part I E 3
- The name and location of receiving waters to which the MS4 outfall or point of discharge discharges
- MS4 regulated service areas
- Stormwater management facilities owned or operated by the permittee

- **Strategies, Objectives, & Measurable Goals:**

The City will work with other departments to continuously maintain the MS4 map. Public Works, Water & Sewer, and any other department who notices new storm infrastructure will contact and notify Stormwater staff or the City's GIS department, and then it will be added to our map. Storm data will be stored on ArcGIS online and updated regularly by stormwater GIS staff. By having an updated map, it will be easier to detect illicit discharges and thus make corrective actions more quickly, ultimately keeping our waters clean.

- **Responsible Departments/Employees:**

- Engineering – Stormwater
- GIS Group

- **Documents or SOPs Associated with Task (Completed Unless Noted Otherwise):**

- GIS Templates
  - Map Template
  - Dataset Descriptions
  - Domain Descriptions

- Field Descriptions
- GIS Datasets
- [Link to Public Storm Viewer](#)
- **Status/Schedule of Implementation:**
  - No later than October 1 of each year, the City shall update the MS4 map to include any new outfall constructed or TMDLs approved or both during the immediately preceding reporting period.
- **Annual Reporting Requirements:**
  - A confirmation statement that the MS4 map has been updated to reflect any changes to the MS4 occurring on or before June 30 of the reporting year.

### MCM TASK 3B – Outfall Information Table

- **Description:**

The City shall maintain an outfall information table associated with the MS4 map that includes the following information for each outfall or point of discharge:

  - A unique identifier as specified on the MS4 map
  - The latitude and longitude of the outfall or point of discharge
  - The estimated regulated acreage draining to the outfall or point of discharge
  - The name of the receiving water
  - The 6<sup>th</sup> Order Hydrologic Unit Code of the receiving water
  - An indication as to whether the receiving water is listed as impaired in the Virginia 2022 305(b)/303(d) Water Quality Assessment Integrated Report
  - The name of any EPA approved TMDLs for which the permittee is assigned a waste load allocation
- **Strategies, Objectives, & Measurable Goals:**

The City will work continuously to maintain the outfall information table. Any department that notices new outfalls will contact and notify the Stormwater staff or the City’s GIS department to add any new outfall to our table. By having an updated table, it will be easier to detect illicit discharges on our maps and thus make corrective actions more quickly, ultimately keeping our waters clean.
- **Responsible Departments/Employees:**
  - Engineering – Stormwater
  - GIS Group
- **Documents or SOPs Associated with Task (Completed Unless Noted Otherwise):**
  - Outfall Map and associated GIS Data
  - Table of Outfalls



- **Status/Schedule of Implementation:**
  - No later than October 1 of each year, we shall update the MS4 information table to include any new outfall constructed or TMDLs approved or both during the immediately preceding reporting period.
- **Annual Reporting Requirements:**
  - A confirmation statement that the MS4 outfall information table has been updated to reflect any changes to the MS4 occurring on or before June 30 of the reporting year.

### MCM TASK 3C – Create a Format File Geodatabase

- **Description:**

The format file geodatabase or two shapefiles will contain a minimum of:

  - A point feature class or shapefile for outfalls with an attribute table containing outfall data elements required in accordance with Part I E 3 a (2); and
  - A polygon feature class or shapefile for the MS4 service area as required in accordance with Part I E 3 a (1) (d) with an attribute table containing the following information:
    - MS4 operator name
    - MS4 permit number
    - MS4 service area total acreage rounded to the nearest hundredth
- **Strategies, Objectives, & Measurable Goals:**

The City will work with other departments to create the geodatabase.  
All file geodatabase feature classes or shapefiles shall be submitted in the following data format standards:

  - Point data in NAD83 or WGS84 decimal degrees global positional system coordinates;
  - Data projected in Virginia Lambert Conformal Conic format;
  - Outfall location accuracy shall be represented in decimal degrees rounded to at least the fifth decimal place for latitude and longitude to ensure point location accuracy (e.g., 37.61741, -78.15279); and
  - Metadata that shall provide a description of each feature class or shapefile dataset, units of measure as applicable, coordinate system, and projection.
- **Responsible Departments/Employees:**
  - Engineering – Stormwater
  - GIS Group
- **Documents or SOPs Associated with Task (Completed Unless Noted Otherwise):**
  - GIS Templates
    - Dataset Descriptions
    - Domain Descriptions
    - Field Descriptions
    - GIS Datasets
  - [Link to Public Storm Viewer](#)

- **Status/Schedule of Implementation:**
  - No later than 24 months after permit issuance, the City shall submit the format file geodatabase to DEQ. Annually, the City will create a Geographic Information System (GIS) compatible shapefile of the MS4 map.
- **Annual Reporting Requirements:**

N/A

#### MCM TASK 3D – Notification of Regulated Downstream MS4

- **Description:**

The City of Manassas will provide written notice to any downstream adjacent MS4 of any physical interconnections. The City discharges into the following three regulated MS4s: 1) Prince William County, 2) Virginia Department of Transportation, and 3) City of Manassas Park.
- **Strategies, Objectives, & Measurable Goals:**

Using the City’s ArcGIS mapping software, the City will identify physical interconnections and send written notice. In the event of finding an illicit discharge, the upstream MS4s will help identify the potential source(s) of pollutants and will notify the downstream MS4s. By keeping communication open and notifying the downstream MS4s, pollution can be contained before it spreads further. The following three interconnections to downstream MS4s are currently identified.

  - Prince William County
  - Virginia Department of Transportation
  - City of Manassas Park

There have been no new interconnections during this last permit cycle.

- **Responsible Departments/Employees:**
  - Engineering – Stormwater
- **Documents or SOPs Associated with Task (Completed Unless Noted Otherwise):**
  - 2023 Notification Letter to Regulated Downstream MS4
- **Status/Schedule of Implementation:**
  - The City will submit this notification two (2) months after the current permit is effective. We will notify upon discovery should one or more be found after submission.

- **Annual Reporting Requirements:**

A list of illicit discharges to the MS4, including spills reaching the MS4 with information as follows:

- The location and source of illicit discharge
- The dates that the discharge was observed, reported, or both
- Whether the discharge was discovered by the permittee during dry weather screening, reported by the public, or other method (describe)
- How the investigation was resolved
- A description of any follow-up activities
- The date the investigation was closed

### MCM TASK 3E – Illicit Discharge Detection and Elimination Ordinance

- **Description:**

The City will maintain the legal authority to enforce City Ordinance #O-2024-10, Code Sec.58-115 through Sec.58-120, prohibiting non-stormwater discharges into the MS4 and local streams.

- **Strategies, Objectives, & Measurable Goals:**

In December 2023, the City updated the ordinance for illicit discharge detection and elimination. The ordinance details how it is unlawful for any person to discharge or deposit any wastes or pollution in the City's MS4, including information about illicit discharges to the storm sewer system and state waters, notice to correct actions, and penalties for violations should no action be taken. According to the City's Code of Ordinances, the purposes is to *"enable the City to comply with its Municipal Separate Storm Sewer System ("City MS4") permit and other state and federal laws and regulations governing the protection of stormwater by preventing the discharge of non-stormwater substances into the City MS4 and to prevent discharges of prohibited substances into waters of the Commonwealth of Virginia that are located within the jurisdictional boundaries of the City. The objective of this Division is to:*

- A. Prevent the discharge of non-stormwater and/or prohibited substances into the City MS4 and state waters;*
- B. Prevent illicit connections to the City MS4;*
- C. Facilitate compliance with the state-issued City of Manassas MS4 permit; and*
- D. Authorize the City to investigate and enforce violations of this Division. "*

- **Responsible Departments/Employees:**

- Engineering – Stormwater
- City Attorney

- **Documents or SOPs Associated with Task (Completed Unless Noted Otherwise):**

- 2023 Stormwater IDDE Inspection & Enforcement SOP (*draft*)
- City Ordinance #O-2024-10, Code Sec.58-115 through Sec.58-120

- **Status/Schedule of Implementation:**

- Ongoing.

- **Annual Reporting Requirements:**
  - Summary of ordinance updates, if applicable.

### MCM TASK 3F – Written Procedures to Detect & Eliminate Illicit Discharges

- **Description:**

The City of Manassas ensure written procedures designed to detect, identify, and address unauthorized non-stormwater discharges to the MS4 are in place at all time and implement them when necessary.
- **Strategies, Objectives, & Measurable Goals:**

Written procedures shall include:

  - A description of the legal authorities, policies, standard operating procedures, or other legal mechanisms available to the permittee to eliminate identified sources of ongoing illicit discharges, including procedures for using legal enforcement authorities;
  - Dry weather field screening protocols [see Task 3G for details];
  - A timeframe upon which to conduct an investigation to identify and locate the source of any observed unauthorized non-stormwater discharge;
  - Methodologies to determine the source of all illicit discharges. If the permittee is unable to identify the source of an illicit discharge within six months of beginning the investigation then the permittee shall document that the source remains unidentified. If the observed discharge is intermittent, the permittee shall document that attempts to observe the discharge flowing were unsuccessful; and
  - Methodologies for conducting a follow-up investigation for illicit discharges that are continuous or that permittees expect to occur more frequently than a one-time discharge to verify that the discharge has been eliminated except as provided for in Part I E 3 c (4).
- **Responsible Departments/Employees:**
  - Engineering – Stormwater
- **Documents or SOPs Associated with Task (Completed Unless Noted Otherwise):**
  - City Ordinance #O-2024-10, Code Sec.58-115 through Sec.58-120
  - 2023 Stormwater IDDE Inspection & Enforcement SOP (*draft*)
  - 2019 Dry Weather Screening SOP
- **Status/Schedule of Implementation:**
  - The City will review the procedures annually and update as needed.
- **Annual Reporting Requirements:**
  - Summary of changes to written procedures, as needed.

### MCM TASK 3G – Dry Weather Screening

- **Description:**

Dry weather screening is the process of identifying discharges from outfalls during a period with no precipitation or runoff in the past 48 hours. It involves monitoring for flow and physical characteristics in the storm pipe and outfall channel for signs of potential illicit discharges. The dry weather screening process helps detect, identify, and eliminate illicit discharges to the MS4 as quickly as possible.

- **Strategies, Objectives, & Measurable Goals:**

The City will conduct at least 50 dry weather screenings annually (no more than 50% being screened within the previous 12-month period). Outfalls are prioritized based on procedures in the City’s Dry Weather Screening SOP. Screenings will be recorded in our GIS system. And will collect, at minimum, the following information:

- The unique identifier for the outfall or observation point;
- Time since the last precipitation event;
- The estimated quantity of the last precipitation event;
- Site descriptions (e.g., conveyance type and dominant watershed land uses);
- Observed indicators of possible illicit discharge events, such as floatables, deposits, stains, and vegetative conditions (e.g., dying or dead vegetation, excessive vegetative growth);
- Whether or not a discharge was observed;
- If a discharge was observed, the estimated discharge rate and visual characteristics of the discharge (e.g., odor, color, clarity) and the physical condition of the outfall; and
- For observation points, the location, downstream outfall unique identifier, and risk factors or rationale for establishing the observation point.

The City will measure goals by recording how many outfalls we screen as well as how many were investigations. The table below is an example of how this will be recorded.

**Table 8: Dry Weather Screening Summary**

Illicit Discharge Category	Total No. of Outfalls Screened	% of Screened Outfalls	Referred for Investigation	% Investigations of Screened Outfalls
Unlikely				
Potential (presence of two or more indicators)				
Suspect (one or more indicators ranked w/ severity of 2 or 3)				
TOTAL				

Illicit discharges reported by the public and investigations the City will conduct to follow up on will not be counted as screening events (see Task 3H); however, once the resolution of the investigation and the date the investigation was closed has been documented, an observation point may be established for future screening events.

- **Responsible Departments/Employees:**
  - Engineering – Stormwater
  - GIS Group
  
- **Documents or SOPs Associated with Task (Completed Unless Noted Otherwise):**
  - 2023 Stormwater IDDE Inspection & Enforcement SOP (*draft*)
  - 2019 Dry Weather Screening SOP
  
- **Status/Schedule of Implementation:**
  - Ongoing – will be completed annually.
  
- **Annual Reporting Requirements:**
  - The total number of outfalls and observation points screened during the reporting period as part of the dry weather screening program.
  - The total number of outfalls and observation points screened during the reporting period as part of the dry weather screening program.

### MCM TASK 3H – Illicit Discharge Tracking

- **Description:**

The City will track, record, and respond to all potential illicit discharges. Investigations and results, including any enforcement actions, will also be tracked. The illicit discharge tracking process helps detect, identify, and eliminate illicit discharges to the MS4 as quickly as possible.
  
- **Strategies, Objectives, & Measurable Goals:**

The City uses a Spreadsheet, along with a GIS-based application to track all potential illicit discharge notifications, investigations, and follow-up action. At a minimum, the City collects the following information in this tracker:

  - The dates that the illicit discharge was initially observed, reported, or both;
  - The results of the investigation, including the source, if identified;
  - Any follow-up to the investigation;
  - Resolution of the investigation; and
  - The date that the investigation was closed.
  
- **Responsible Departments/Employees:**
  - Engineering – Stormwater
  
- **Documents or SOPs Associated with Task (Completed Unless Noted Otherwise):**
  - City Ordinance #O-2024-10, Code Sec.58-115 through Sec.58-120
  - 2023 Stormwater IDDE Inspection & Enforcement SOP (*draft*)

- 2019 Dry Weather Screening SOP
- IDDE Tracker Spreadsheet (on server)
  
- **Status/Schedule of Implementation:**
  - Ongoing – tracking mechanism will be reviewed annually for effectiveness.
  
- **Annual Reporting Requirements:**
  - A list of illicit discharges to the MS4, including spills reaching the MS4 with information as follows:
    - The location and source of illicit discharge;
    - The dates that the discharge was observed, reported, or both;
    - Whether the discharge was discovered by the permittee during dry weather screening, reported by the public, or other method (describe);
    - How the investigation was resolved;
    - A description of any follow-up activities; and
    - The date the investigation was closed.

#### Minimum Control Measure #4: Construction Site Stormwater Runoff Control

The permittee shall:

- Utilize its legal authority, such as ordinances, permits, orders, specific contract language, and interjurisdictional agreements, to address discharges entering the MS4 from regulated construction site stormwater runoff;
- The permittee shall require implementation of appropriate controls to prevent non-stormwater discharges to the MS4, such as wastewater, concrete washout, fuels and oils, and other illicit discharges identified during land disturbing activity inspections. The discharge of non-stormwater discharges other than those identified in 9VAC25-890-20 D through the MS4 is not authorized by this state permit; and
- Employees and contractors serving as plan reviewers, inspectors, program administrators, and construction site operators shall obtain the appropriate certifications as required under the Virginia Erosion and Sediment Control Law and its attendant regulations.

#### MCM TASK 4A – Maintain Erosion and Sediment Control Program Consistency

- **Description:**

The City implements the Virginia Erosion and Sediment Control Program (VESCP) consistent with the Virginia Erosion and Sediment Control Law (§ 62.1-44.15:51 et seq. of the Code of Virginia) and Virginia Erosion and Sediment Control Regulations (9VAC25-840).
  
- **Strategies, Objectives, & Measurable Goals:**

As part of the City’s VESCP, the City reviews erosion and sediment control plans and stormwater management plans for proposed land-disturbing activities of 2,500 square feet or greater. It shall be the goal of the City to maintain a rating of “consistent” for the City’s E&S Program during each permit cycle.

As part of this Program, the City will maintain a database log for tracking all land disturbing activities, including a record of plan review, construction start date, permits, and bond release. This database log is to ensure all required data needed to be reported is to the DEQ is accurate and well maintained.

City site inspectors will also inspect all land disturbing activities in accordance with state regulations to ensure the site is in compliance with the approved Erosion and Sediment Control plans. Site inspectors use a GIS-based application with the ESC Construction Inspection Report built in to record inspections, required corrective actions, stops works orders, and follow-up notes.

Erosion and Sediment Control Plan Reviewers, Inspectors, and Program Administrators, and Construction Site Operators (e.g. Responsible Land Disturber) shall obtain the appropriate certifications through the Department of Environmental Quality (DEQ). City inspectors maintain certification status to perform erosion and sediment control inspections and appropriate staff will receive DEQ Stormwater Inspector Training in order to perform periodic comprehensive onsite stormwater pollution prevention plan (SWPPP) inspections.

- **Responsible Departments/Employees:**
  - Engineering – Site Inspectors & Stormwater
  - Department of Community Development
  
- **Documents or SOPs Associated with Task (Completed Unless Noted Otherwise):**
  - [City Code Chapter 58, Article III - Erosion and Sedimentation Control](#)
  - [City Design and Construction Standards Manual \(DCSM\)](#)
  - ESC Construction Inspection GIS Database
  - ESC Construction Inspection Report Form Template
  
- **Status/Schedule of Implementation:**
  - Ongoing – program to be reviewed annually.
  
- **Annual Reporting Requirements:**
  - Confirmation statement that all land disturbing activities were occurred during the reporting period were conducted in accordance with the City’s VESCP.
  - Total number of erosion and sediment control inspections conducted.
  - Total number of each type of compliance action and enforcement action implemented.
  - Number of staff members with DEQ certifications related to erosion and sediment control.

#### MCM TASK 4B – Erosion and Sediment Control Ordinance and Technical Criteria

- **Description:**

The City will maintain the legal authority to enforce Code Chapter 58 – Environment, Article 3 - Erosion and Sedimentation Control, Sec.58-115 through Sec.58-120. The City will also maintain the Design and Construction Standards Manual (DCSM), which provides technical and



administrative requirements for land development in the City of Manassas – including a section on erosion and sediment control requirements. The City’s DCSM is authorized by the City Code of Ordinances, Section 106.

- **Strategies, Objectives, & Measurable Goals:**

The objectives of the ESC ordinance are to conserve the land, water, air and other natural resources of the city and to promote the public health and welfare of the people in the city by establishing requirements for the effective control of soil erosion, sediment deposition and nonagricultural runoff which must be met to prevent the unreasonable degradation of properties, stream channels, waters and other natural resources, and by establishing procedures whereby these requirements shall be administered and enforced.

Current erosion and sediment ordinances topics include:

- Required land disturbing permits
- prerequisites for issue of permits (including bonds)
- Monitoring, reports, and inspections
- Stop work orders
- Plan requirements for land disturbing activities

Current topics in the City’s DCSM relating to erosion and sediment control focus on enforceable technical guidance such as materials and stabilization measures and the permitting process.

- **Responsible Departments/Employees:**

- Engineering
- City Attorney

- **Documents or SOPs Associated with Task (Completed Unless Noted Otherwise):**

- [City Code Chapter 58, Article III - Erosion and Sedimentation Control](#)
- [City Design and Construction Standards Manual \(DCSM\)](#)

- **Status/Schedule of Implementation:**

- Ongoing.

- **Annual Reporting Requirements:**

- Summary of ordinance updates, if applicable.

### Minimum Control Measure #5: Post-Construction Stormwater Management in New Development & Redevelopment

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 and implement the VSMP consistent with the Virginia Stormwater Management Act (§ 62.1-44.15:24 et seq. of the Code of Virginia) and VSMP Regulations (9VAC25-870) as well as

- maintain an inspection and maintenance program in accordance with Part I E 5 b and c;
- Implement an inspection and maintenance program for those stormwater management facilities owned or operated by the permittee:
    - Within six months of the permit effective date, the permittee shall develop and maintain written inspection and maintenance procedures in order to ensure adequate long-term operation and maintenance of its stormwater management facilities. The permittee may use inspection and maintenance specifications available from the Virginia Stormwater BMP Clearinghouse or inspection and maintenance plans developed in accordance with the department's Stormwater Local Assistance Fund (SLAF) guidelines;
    - Employees and contractors implementing the stormwater program shall obtain the appropriate certifications as required under the Virginia Stormwater Management Act and its attendant regulations;
    - The permittee shall inspect stormwater management facilities owned or operated by the permittee no less frequently 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 often than once per five years;
    - If during the inspection of the stormwater management facility conducted in accordance with Part I E 5 b (2), it is determined that maintenance is required, the permittee shall conduct the maintenance in accordance with the written procedures developed under Part I E 5 b (1); and
    - Implement an inspection and enforcement program for stormwater management facilities not owned by the permittee (i.e., privately owned);
  - For traditional permittees described in Part I E 5 a (1), (2), or (3), the permittee shall implement an inspection and enforcement program for stormwater management facilities not owned by the permittee, utilize its legal authority for enforcement of the maintenance responsibilities in accordance with 9VAC25-870-112 if maintenance is neglected by the owner, develop and implement a progressive compliance and enforcement strategy provided that the strategy is included in the MS4 program plan, and utilize the inspection reports provided by the owner of a stormwater management facility as part of an inspection and enforcement program in accordance with 9VAC25-870-114 C.

#### MCM TASK 5A – VSMP Implementation Consistent with Regulations

- **Description:**

The City implements a Virginia Stormwater Management Program (VSMP) consistent with the Virginia Stormwater Management Act (§ 62.1-44.15:24 et seq. of the Code of Virginia) and VSMP Regulations (9VAC25-870).
- **Strategies, Objectives, & Measurable Goals:**

The City will comply with all VSMP Regulations – including, but not limited to having a program for: regulated land-disturbing activities, stormwater management plan review – including SWPPPs, stormwater management design criteria including water quality and water quantity requirements, long-term maintenance and inspections of permanent stormwater management facilities, and enforcement. MCM Tasks 5B-5G, below, provide more detail into some of these

requirements, and how the City will demonstrate compliance with both VSMP regulations and the MS4 Permit.

- **Responsible Departments/Employees:**
  - Engineering – Stormwater
  - Department of Community Development
- **Documents or SOPs Associated with Task (Completed Unless Noted Otherwise):**
  - Community Development SOP for Submitting Stormwater Construction General Permits
  - DEQ VSMP approval letter
- **Status/Schedule of Implementation:**
  - Ongoing.
- **Annual Reporting Requirements:**
  - N/A

#### MCM TASK 5B – Stormwater Management Ordinance and Technical Criteria

- **Description:**

In order to control post-construction runoff after construction, the City will maintain the legal authority to enforce Code Chapter 58 – Environment, Article 3 - Virginia Stormwater Management Program, Sec.58-115 through Sec.58-120. The City will also maintain the Design and Construction Standards Manual (DCSM), which provides technical and administrative requirements for land development in the City of Manassas – including a section on stormwater management requirements. The City’s DCSM is authorized by the City Code of Ordinances, Section 106.
- **Strategies, Objectives, & Measurable Goals:**

The objectives of the stormwater management ordinance are to ensure the general health, safety, and welfare of the citizens of the City of Manassas and protect the quality and quantity of state waters from the potential harm of unmanaged stormwater, including protection from a land-disturbing activity causing unreasonable degradation of properties, water quality, stream channels, and other natural resources, and to establish procedures whereby stormwater requirements related to water quality and quantity shall be administered and enforced. Current stormwater management ordinances topics include:

  - Stormwater requirements
  - Stormwater management programs
  - Stormwater pollution prevention plans
  - Review of stormwater management plans
  - Technical Criteria
  - Maintenance
  - Enforcement

The City's stormwater management ordinance references the City's DCSM, which provides technical guidelines for stormwater management - including design, installation, and post-construction maintenance. Stormwater management facilities must be properly designed and installed to ensure proper function – to reduce pollutants and the facilities continue to provide long-term water quality benefits. Article 8 of the DCSM, it discusses design guidelines for storm drainage in the City.

The City uses inspection and maintenance specifications available from the Virginia Stormwater BMP Clearinghouse or inspection and maintenance plans developed. Projects must use the Virginia Runoff Reduction Method spreadsheet to demonstrate compliance and project plans must contain a note that the stormwater facility will be installed under the supervision of the design professional and certified that it is constructed and installed as designed. Stormwater facilities must be installed under the general supervision of a design engineer, and as-built plan submission must be signed/sealed by the design professional and include a signed/sealed separate certification that the facility was installed as designed. All new designs are reviewed for compliance with DCSM Article 8 and the Virginia BMP Clearinghouse. Article 2 of DCSM covers

- **Responsible Departments/Employees:**
  - Engineering – Stormwater
  - Department of Community Development
  
- **Documents or SOPs Associated with Task (Completed Unless Noted Otherwise):**
  - [Chapter 58, Article IV – Virginia Stormwater Management Program](#)
  - [City Design and Construction Standards Manual \(DCSM\)](#)
  - Stormwater Management Facility Maintenance Agreement Template
  
- **Status/Schedule of Implementation:**
  - Ongoing.
  
- **Annual Reporting Requirements:**
  - Summary of ordinance updates, if applicable.
  - Summary of updates to the DCSM as it relates to stormwater management, if applicable.

#### **MCM TASK 5C – Stormwater Management Certifications**

- **Description:**

Employees and contractors implementing the stormwater program shall obtain the appropriate certifications as required under the Virginia Stormwater Management Act and its attendant regulations. These certifications include SWM and ESC Program Administrator, Inspector, and/or Plan Reviewer.

**Table 9: Types of Stormwater Management Certifications**

Program Administrator	Inspector	Plan Reviewer
<ul style="list-style-type: none"> <li>• Virginia stormwater management laws and regulations</li> <li>• Requirements for administering a VSMP</li> <li>• Basic stormwater principles</li> </ul>	<ul style="list-style-type: none"> <li>• Virginia stormwater management law and regulations</li> <li>• Basic stormwater principles</li> <li>• Construction general permit requirements</li> <li>• Stormwater best management practices</li> </ul>	<ul style="list-style-type: none"> <li>• Virginia stormwater management law and regulations</li> <li>• Overview of stormwater plan design hydrologic/hydraulic concepts</li> <li>• Environmental site design</li> <li>• Energy balance method</li> <li>• Virginia Runoff Reduction Method and spreadsheet</li> <li>• 15 non-proprietary stormwater facilities</li> <li>• Stormwater plan evaluation strategies</li> <li>• Plan review tools and tips</li> </ul>

- **Strategies, Objectives, & Measurable Goals:**  
Plan reviewers, Inspectors, Program administrators, and Construction site operators shall obtain the appropriate certifications through the Department of Environmental Quality (DEQ) within a specific time frame from their hire date written in their job acceptance letter. The City of Manassas notes in their job descriptions that these certificates must be obtained within the first year from the time a new employee starts working. City inspectors maintain certification status to perform post-construction stormwater management inspections. Inspectors complete inspection reports and note corrective action, if applicable. Having employees trained and certified means fewer mistakes while working out in the field at construction sites or inspecting and maintaining stormwater management facilities.
- **Responsible Departments/Employees:**
  - Engineering – Stormwater
- **Documents or SOPs Associated with Task (Completed Unless Noted Otherwise):**
  - N/A
- **Status/Schedule of Implementation:**
  - Ongoing.
- **Annual Reporting Requirements:**
  - Number of employees certified.

**MCM TASK 5D – Stormwater Management Facility Inventory & Reporting**

- **Description:**  
The City will track all post-construction stormwater management facilities using the City’s inventory spreadsheet. Starting in Summer of 2024, the City will switch an asset management database, Cartegraph. The City will also report all stormwater management facilities through the *DEQ BMP Warehouse* and/or the *Virginia Construction Stormwater General Permit Database*.

For the purposes of the MS4 Permit, DEQ refers to stormwater management facilities as “best management practices” or “BMPs,” which they define as a practice that achieves quantifiable nitrogen, phosphorus, or total suspended solids reductions, including stormwater management facilities, ecosystem restoration projects, annual practices, and other practices approved by the department for reducing nitrogen, phosphorus, and total suspended solids pollutants.

- **Strategies, Objectives, & Measurable Goals:**

The following information for each stormwater management facility will tracked and be reported to the *DEQ BMP Warehouse* in accordance with Part IV of the MS4 Permit by the Engineering – Stormwater Division:

- The BMP type;
- The BMP location as decimal degree latitude and longitude;
- The acres treated by the BMP (including total acres and impervious acres);
- The date the BMP was brought online (MM/YYYY) – if date not known, use 06/2005;
- The 6<sup>th</sup> Order Hydrologic Unit Code in which the BMP is located;
- Whether the BMP is owned or operated by the City or privately owned;
- Whether or not the BMP is part of the City’s Chesapeake Bay TMDL action plan required in Part II A or Local TMDL action plan required in Part II B, or both;
- If the BMP is privately owned, whether a maintenance agreement exists;
- The date of the City’s most recent inspection of the BMP; and
- Any other information specific to the BMP type required by the DEQ BMP Warehouse (e.g. linear feet of stream restoration)

For sites covered under a General VPDES Permit for Discharges of Stormwater from Construction Activities, the Department of Community Development will submit new stormwater management facilities or BMPs to the *Virginia Construction Stormwater General Permit Database* for those land disturbing activities for which the permittee was required to obtain coverage under the s in accordance with Part III B 1 or a statement that the permittee did not complete any projects requiring coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities (9VAC25-880)

- **Responsible Departments/Employees:**

- Engineering – Stormwater
- Department of Community Development

- **Documents or SOPs Associated with Task (Completed Unless Noted Otherwise):**

- Stormwater Management Facility/BMP Master Inventory Spreadsheet
- *DEQ BMP Warehouse* Submission SOP (*in development*)

- **Status/Schedule of Implementation:**

- Tracking: Ongoing.
- Reporting: No later than October 1st of each year, the City will update the *DEQ BMP Warehouse* in accordance with Part IV of the MS4 Permit.

- **Annual Reporting Requirements:**
  - A confirmation statement that the City submitted stormwater management facility information through the Virginia Construction Stormwater General Permit database for those land disturbing activities for which the permittee was required to obtain coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities in accordance with Part III B 1 or a statement that the permittee did not complete any projects requiring coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities (9VAC25-880).
  - A confirmation statement that the City electronically reported stormwater management facilities using the *DEQ BMP Warehouse* in accordance with Part III B 1 and 2 of the MS4 Permit.
  - A confirmation statement that the permittee electronically reported stormwater management facilities inspected using the *DEQ BMP Warehouse* in accordance with Part III B.5. of the MS4 Permit.

#### MCM TASK 5E – Public Stormwater Management Facility Inspection

- **Description:**

The City will inspect all publicly-owned or maintained stormwater management facilities no less than once per year.
- **Strategies, Objectives, & Measurable Goals:**

The City will either utilize in-house help or contractual help to perform an annual formal inspection of the stormwater management facility's condition. All inspections will be conducted by a DEQ-certified Stormwater Management Inspector. The facility will be evaluated against the engineering plans and for routine and non-routine maintenance. By keeping an inspection schedule and inspecting, the City can be proactive in finding what type of maintenance a stormwater management facility may require and then take action to ensure the facility is working properly in a timely manner and ensure adequate long-term operation.

The City will track the stormwater management facility information with the inspection date and outcome of the inspection in the City's GIS-based asset management platform.
- **Responsible Departments/Employees:**
  - Engineering – Stormwater
- **Documents or SOPs Associated with Task (Completed Unless Noted Otherwise):**
  - Stormwater Facility Inspection Report Form Templates
  - SOP for Post Construction SWM Facility Inspections (2019)
- **Status/Schedule of Implementation:**
  - A formal inspection of all publicly-owned or maintained of stormwater management facilities will be completed annually.

- Completed by May 1, 2024, the City will develop and maintain written inspection and maintenance procedures in order to ensure adequate long-term operation and maintenance of its stormwater management facilities.
- **Annual Reporting Requirements:**
  - Total number of inspections conducted on stormwater management facilities owned or operated by the City.

#### MCM TASK 5F – Public BMP Facility Maintenance

- **Description:**

The City developed and implemented written inspection and maintenance procedures in order to ensure adequate long-term operation and maintenance of its stormwater management facilities. The City may use inspection and maintenance specifications available from the *Virginia Stormwater BMP Clearinghouse* or inspection and maintenance plans developed in accordance with the department's Stormwater Local Assistance Fund (SLAF) guidelines.
- **Strategies, Objectives, & Measurable Goals:**

Following the City written maintenance guidelines, the City will maintain all City-owned and/or operated stormwater management facilities according to the maintenance guidelines. For routine maintenance, a dedicated crew from the Department of Public Works – Streets Division will perform maintenance at least monthly or after large rain events, at the direction of the Engineering – Stormwater Division. For non-routine maintenance, the City will either utilize in-house help (i.e., from the Department of Public Works of Utilities) or hire contractors based on the annual formal inspections or from routine maintenance visits.

The City will track maintenance needs and work performed using their GIS-based asset management platform.

- **Responsible Departments/Employees:**
  - Engineering – Stormwater
  - Department of Public Works – Streets Division (stormwater maintenance crew)
  - Department of Utilities
- **Documents or SOPs Associated with Task (Completed Unless Noted Otherwise):**
  - 2024 Stormwater Management Facility Management SOP (draft)
- **Status/Schedule of Implementation:**
  - Maintenance: Ongoing.
  - Completed by May 1, 2024, the City will develop and maintain written inspection and maintenance procedures in order to ensure adequate long-term operation and maintenance of its stormwater management facilities.



- **Annual Reporting Requirements:**
  - A description of the significant maintenance, repair, or retrofit activities performed on the stormwater management facilities owned or operated by the City. This does not include routine activities such as grass mowing or trash collection.

#### MCM TASK 5G – Private Stormwater Management Facility Inspection and Enforcement

- **Description:**

The City will implement an inspection and enforcement program for stormwater management facilities not owned by the permittee (i.e., privately owned) that includes:

  - An inspection frequency of no less often than once per five years for all privately-owned stormwater management facilities that discharge into the MS4;
  - Adequate long-term operation and maintenance by the owner of the stormwater management facility by requiring the owner to develop and record a maintenance agreement, including an inspection schedule. The City will utilize its legal authority for enforcement of the maintenance responsibilities in accordance with 9VAC25-870-112 if maintenance is neglected by the owner.
- **Strategies, Objectives, & Measurable Goals:**

City Code Sec. 58-108 and Sec.58-109 (ordinance #O-2014-21) provide legal authority to require long-term maintenance of permanent stormwater management facilities through maintenance agreements and post-construction inspections. This ordinance also states that post-construction inspections by the City will occur, at minimum, at least once every five years.

In addition, Section 750 of the City’s Design and Construction Manual (DCSM) states the following regarding maintenance agreements and inspections:

*“All development that includes SWM/BMP facilities shall have a maintenance agreement to ensure its continued functioning. The plans shall also provide general maintenance needs for the facility. This agreement is to be recorded with the Plat for the property served by the facilities. If existing maintenance agreement is available, an updated maintenance agreement is required for modification and structural repair. For owner-maintained facilities, the maintenance agreement shall require the owner to provide for annual inspections to be performed by a professional engineer familiar with the design and operation of SWM/BMP facilities who shall provide a report addressing the matters set out in this section. The required cleaning, repairs, and reconstruction of the facilities should also be performed under the direction of registered professionals. The inspection report shall include the observations, measurements, or tests which were performed, and the schedule for repairs when needed. The reports shall also include the inspector's qualifications. The certified reports shall be forwarded to the Department of Engineering before June 30 of each year. The Department of Engineering will review reports, and comment on the inspector's conclusions, and may perform inspections or maintenance as necessary. If the Department of Engineering requires additional maintenance, that maintenance shall be completed within thirty (30) days of such notification. If the Department of Public Works performs any maintenance, the owner may be responsible*

*for all costs incurred resulting from the maintenance operation. All parcels draining into the SWM/BMP shall be covered under a maintenance agreement.”*

For inspections performed by the City, the City will either utilize in-house help or contractual help to perform an annual formal inspection of the stormwater management facility's condition. All inspections will be conducted by a DEQ-certified Stormwater Management Inspector. The facility will be evaluated against the engineering plans and for routine and non-routine maintenance. After the inspection is complete, a copy of the inspection will be sent to the owner. If inadequate maintenance is observed by the City, the City shall notify, in writing, the property owner or other person violating these regulations. The notification shall indicate the nature of the violation, contain the address or other description of the site upon which the violation is occurring, order the necessary action to correct the violation, and give a deadline for correcting the violation. Notification will follow the procedure below:

1. The first Letter of Notification shall require the owner to contact the City with a maintenance plan within 30 days and shall allow 90 days for the owner to perform the required stormwater management facility maintenance actions.
2. If an adequate response is not received within 30 days following the Letter of Notification, a Letter of Corrective Action will be issued requiring the owner to contact the City with a maintenance plan and to perform the required stormwater management facility maintenance within 60 days.
3. If an adequate response is not received within 30 days following the Letter of Corrective Action, a Notice of Noncompliance will be issued requiring the owner to contact the City with a maintenance plan and to perform the required stormwater management facility maintenance within 30 days.
4. If an adequate response is not received within 30 days following the Notice of Noncompliance, a Notice of Violation with associated civil penalties will be issued by the City Attorney's Office.

- **Responsible Departments/Employees:**
  - Engineering – Stormwater (inspections)
  - Department of Community Development (maintenance agreements)
  - City Attorney (enforcement)
  
- **Documents or SOPs Associated with Task (Completed Unless Noted Otherwise):**
  - Stormwater Management Facility Maintenance Agreement Template
  - Stormwater Facility Inspection Report Form Templates
  - Private Stormwater Management Facility Follow-up Maintenance Required Template
  
- **Status/Schedule of Implementation:**
  - Inspections on approximately 25% of the private stormwater management facilities in the City will be conducted annual. Each one will be conducted at least once during the Permit cycle.

- **Annual Reporting Requirements:**
  - The number of privately-owned stormwater management facility inspections conducted.
  - The number of enforcement actions initiated by the permittee to ensure long-term maintenance of privately-owned stormwater management facilities including the type of enforcement action.

### Minimum Control Measure #6: Pollution Prevention and Good Housekeeping for Facilities Owned or Operated by the Permittee within the MS4 Service Area

The permittee shall:

- Develop, maintain, and implement written good housekeeping procedures;
- Require through the use of contract language, training, written procedures, or other measures within the permittee's legal authority that contractors employed by the permittee and engaging in activities follow established good housekeeping procedures and use appropriate control measures to minimize the discharge of pollutants to the MS4;
- The written procedures established in accordance with Part I E 6 a and b shall be utilized as part of the employee training program, and the permittee shall develop a written training plan for applicable field personnel;
  - Maintain documentation of each training activity conducted by the permittee for a minimum of three years after training activity completion;
  - Fulfill the training requirements in total or in part, through regional training programs involving two or more MS4 permittees;
- Identify any new high-priority facilities located in expanded 2020 census urban areas with a population of at least 50,000;
- Implement SWPPPs for high-priority facilities;
  - Maintain and implement a site specific [SWPPP] for each high-priority facility
  - Annually review any high-priority facility owned or operated by the permittee for which an SWPPP has not been developed;
  - Review the contents of any site specific SWPPP no later than 30 days after any unauthorized discharge, release, or spill reported in accordance with Part IV G to determine if additional measures are necessary to prevent future unauthorized discharges, releases, or spills;
  - SWPPP shall be kept at the high-priority facility and utilized as part of employee SWPPP training. The SWPPP and associated documents may be maintained as a hard copy or electronically as long as the documents are available to employees at the applicable site;
  - If activities change at a facility such that the facility no longer meets the definition of a high-priority facility, the permittee may remove the facility from the list of high-priority facilities with a high potential to discharge pollutants;
  - If activities change at a facility such that the facility no longer meets the criteria requiring SWPPP coverage as described in Part I E 6 g, the permittee may remove the facility from the list of high-priority facilities that require SWPPP coverage;
- Maintain and implement turf and landscape nutrient management plans that have been developed by a certified turf and landscape nutrient management planner in accordance with § 10.1-104.2 of the Code of Virginia on all lands owned or operated by the permittee where nutrients are applied to a contiguous area greater than one acre.

### MCM TASK 6A – Develop Written Procedures to Minimize or Prevent Discharges

- **Description:**

The City of Manassas will maintain written procedures for daily operations (e.g. street maintenance; equipment maintenance; pesticide, herbicide, and fertilizer application; etc.) designed to minimize or prevent discharges.

- **Strategies, Objectives, & Measurable Goals:**

In order to keep our waterways clean by minimizing or preventing illicit discharges, the City will continue to improve our written procedures and present them to City staff. If City staff is knowledgeable on how to properly dispose of waste materials, prevent the discharges of vehicular wash water, minimize pollutant discharges from municipal automobiles and equipment, ensure application of fertilizers and pesticides is conducted according to manufacturer's recommendations, etc., or knows where they can read the procedures on how to handle these situations, there will be fewer illicit discharges. The City currently has written pollution prevention and good housekeeping procedures for the following activities:

- Non-Stormwater Discharges
- Landscaping and Grounds Maintenance (including the prohibition of application of any anti-icing or deicing agent containing urea or other forms of nitrogen or phosphorus)
- Land Disturbance
- Vehicle/Equipment Maintenance and Repair
- Vehicle/Equipment Fueling
- Vehicle/Equipment Parking and Storage
- Vehicle/Equipment Washing
- Road, Street, & Parking Lot Maintenance
- Loading & Unloading Operations
- Storm Sewer System Cleaning/Maintenance
- Waste Management
- Material Storage
- Pool Operation and Maintenance
- Salt and Brine Storage Management

The Department of Public Works – Streets Division also has a De-Icing and Snow Removal Plan, which includes the implementation of best management practices for anti-icing and deicing agent application, transport, and storage. The Department of Public Works – Refuse & Recycling Division also implements a Debris Management Plan.

- **Responsible Departments/Employees:**

- Engineering – Stormwater
- Department of Public Works – Streets Division
- Department of Public Works – Refuse & Recycle Division

- **Documents or SOPs Associated with Task (Completed Unless Noted Otherwise):**

- General Pollution and Good Housekeeping Procedures (topics listed above)

- De-Icing & Snow Removal Plan
  - Including the Deicer and Abrasive Usage (Salt Usage) SOP
- Street Sweeping SOP
- Debris Management Plan
- Materials Reduction Site SOP
- **Status/Schedule of Implementation:**
  - Review of current procedures will be completed annually and updated as needed.
- **Annual Reporting Requirements:**
  - A summary of any written procedures developed or modified during the reporting period.

### MCM TASK 6B – Identify All Municipal High-Priority Facilities with a High Potential for Pollutant Discharges

- **Description:**

The City of Manassas will identify all sites with a high potential to discharge pollutants, also known as municipal high-priority facilities.
- **Strategies, Objectives, & Measurable Goals:**

The City's goal is to identify municipal facilities that may create pollutant discharges to the MS4. The City will identify these facilities based on activities that occur and potential risks for stormwater pollution to runoff from the site. A site will be considered a high priority facility if includes any of the following:

  - Areas where residuals from using, storing, or cleaning machinery or equipment remain and are exposed to stormwater;
  - Materials or residuals on the ground or in stormwater inlets from spills or leaks;
  - Material handling equipment;
  - Materials or products that would be expected to be mobilized in stormwater runoff during loading or unloading or transporting activities (e.g., rock, salt, fill dirt);
  - Materials or products stored outdoors (except final products intended for outside use where exposure to stormwater does not result in the discharge of pollutants);
  - Materials or products that would be expected to be mobilized in stormwater runoff contained in open, deteriorated, or leaking storage drums, barrels, tanks, and similar containers;
  - Waste material except waste in covered, nonleaking containers (e.g., dumpsters);
  - Application or disposal of process wastewater (unless otherwise permitted); or
  - Particulate matter or visible deposits of residuals from roof stacks, vents, or both not otherwise regulated (i.e., under an air quality control permit) and evident in the stormwater runoff.

Once the facilities have been identified, the City shall develop and implement Stormwater Pollution Prevention Plans (SWPPPs) for these facilities in order to prevent and eliminate pollutant discharges from municipal facilities (see MCM Task 6C). The City will maintain a list of

all high-priority facilities owned or operated by the permittee not required to maintain an SWPPP. Facilities will be identified by the Engineering Stormwater Team in coordination with other department representatives.

The City has only one active high-priority municipal site currently within the MS4 service area, the Materials Reduction Site (MRS), managed by the Public Works Department. Facilities that were previously evaluated for potential as a high priority facility, but not did meet the requirements were the police vehicle impound yard, fire stations, and water storage facilities.

- **Responsible Departments/Employees:**
  - Engineering – Stormwater
- **Documents or SOPs Associated with Task (Completed Unless Noted Otherwise):**
  - N/A
- **Status/Schedule of Implementation:**
  - Within 12 months of permit coverage, the City will identify any new high-priority facilities located in expanded 2020 census urban areas with a population of at least 50,000 (not applicable to the City of Manassas).
  - Within 36 months of permit coverage, the City will implement SWPPPs for high priority facilities meeting the conditions of the MS4 Permit and which are located in expanded 2020 census urban areas with a population of at least 50,000 (not applicable to the City of Manassas).
  - No later than June 30 of each year, the City will annually review any high-priority facility owned or operated by the permittee for which an SWPPP has not been developed to determine if the facility meets any of the conditions described in the MS4 Permit. If the facility is determined to need an SWPPP, the permittee shall develop an SWPPP no later than December 31 of that same year.
- **Annual Reporting Requirements:**
  - A confirmation statement that all high-priority facilities were reviewed to determine if SWPPP coverage is needed during the reporting period.
  - The rational of any high-priority facilities delisted in accordance with Part I E 6 l or m during the reporting period.

#### MCM TASK 6C – Develop and Implement SWPPPs for High-Priority Facilities with a High Potential for Pollutant Discharges

- **Description:**

The City of Manassas shall develop and implement site-specific Stormwater Pollution Prevention Plans (SWPPPs) for identified high priority facilities with a high potential for discharging pollutants. Each SWPPP shall be evaluated and updated as necessary to reflect any discharge, release, or spill from the facility. A copy of each SWPPP will be kept at each facility and will be updated and utilized during staff trainings.

- **Strategies, Objectives, & Measurable Goals:**

Maintaining and implementing SWPPPs for high-priority municipal facilities will help reduce the potential for pollutant discharges in stormwater runoff through applying and occasional inspections of good housekeeping and pollution prevention best practices for municipal facilities. Each SWPPP shall include:

- A site description that includes a site map identifying all outfalls, direction of stormwater flows, existing source controls, and receiving water bodies;
  - A description and checklist of the potential pollutants and pollutant sources;
  - A description of all potential non-stormwater discharges;
  - A description of all structural control measures, such as stormwater management facilities and other pollutant source controls, applicable to SWPPP implementation (e.g., permeable pavement or oil-water separators that discharge to sanitary sewer are not applicable to the SWPPP), such as oil-water separators, and inlet protection designed to address potential pollutants and pollutant sources at risk of being discharged to the MS4;
  - A maintenance schedule for all stormwater management facilities and other pollutant source controls applicable to SWPPP implementation described in Part I E 6 h (4) of the MS4 Permit;
  - Site specific written procedures designed to reduce and prevent pollutant discharge that incorporate by reference applicable good housekeeping procedures required under Part I E 6 a and of the MS4 Permit;
  - A description of the applicable training as required in Part I E 6 d (4) of the MS4 Permit;
  - An inspection frequency of no less often 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;
  - A log of each unauthorized discharge, release, or spill incident reported in accordance with Part IV G including the following information:
    - Date of incident,
    - Material discharged, released, or spilled, and
    - Estimated quantity discharged, released, or spilled;
  - A log of modifications to the SWPPP made as the result of any unauthorized discharge, release, or spill in accordance Part I E 6 j of the MS4 Permit or changes in facility activities and operation requiring SWPPP modification; and
  - The point of contact for SWPPP implementation.
- **Responsible Departments/Employees:**
    - Engineering – Stormwater
  - **Documents or SOPs Associated with Task (Completed Unless Noted Otherwise):**
    - Material Reduction Site (MRS) SWPPP
  - **Status/Schedule of Implementation:**
    - Ongoing – the SWPPPs will be reviewed and updated annually.

- **Annual Reporting Requirements:**
  - A list of any new SWPPPs developed in accordance with Part I E 6 i of the MS4 Permit during the reporting period.
  - A summary of any SWPPPs modified in accordance with Part I E 6 j, 6 l, or 6 m of the MS4 Permit during the reporting period.

**MCM TASK 6D – Implement Turf and Landscape Nutrient Management Plans**

- **Description:**  
The City of Manassas will maintain and implement turf and landscape nutrient management plans (NMPs) developed by a certified nutrient management planner on all lands owned or operated by the City where nutrients are applied to a contiguous area greater than one acre.
- **Strategies, Objectives, & Measurable Goals:**  
If improperly applied, landscape nutrients have the potential to pollute the local waterways, the Potomac River, and the Chesapeake Bay. The City’s goal is to minimize discharges from fertilizer application by utilizing turf and landscape NMPs to apply nutrients to municipal properties. Stormwater impacts can be lessened by implementing NMPs developed by a certified nutrient planner consistent with § 10.1-104.2 of the Code of Virginia on applicable municipal lands.

The City of Manassas assessed the needed for NMPs throughout the City, and currently implements seven of the seven NMPs required per the MS4 Permit requirements. Table 10, below, provides a list of these seven NMPs and states when they were approved by the Department of Conservation and Recreation (DCR). The Department of Public Works – Buildings & Grounds implements these NMPs and retains a hard copy. The Engineering Stormwater Division retains an electronic copy on their sever.

**Table 10: Locations of Turf & Landscape NMPs**

Site	Acreage	DCR Approval Date	Expiration Date
E.G. Smith (IBM) Ball Fields	5.05	12/15/2022	2/28/2026
Manassas Museum	2.63	1/20/2003	2/28/2026
Jennie Dean Ball Fields	4.41	1/19/2023	2/28/2026
Byrd Park Ball Fields	3.5	1/10/2023	2/28/2026
Public Works Hillside	2.56	1/26/2023	2/28/2026
Osborn High School	8.77	1/26/2023	2/28/2026
Metz Middle School	6.47	1/18/2023	2/28/2026

- **Responsible Departments/Employees:**
  - Engineering – Stormwater
  - Department of Public Works – Building & Grounds
- **Documents or SOPs Associated with Task (Completed Unless Noted Otherwise):**
  - Nutrient Management Plans as listed in Table 10
  - DCR Approval letters for Nutrient Management Plans



- **Status/Schedule of Implementation:**
  - Within 12 months of permit coverage, the permittee shall identify if additional contiguous areas greater than one acre requiring turf and landscape NMPs are necessary.
    - If additional NMPs are needed, within 36 months of permit coverage, the permittee shall implement these turf and landscape NMPs.
  - For newly established turf where nutrients are applied to a contiguous area greater than one acre, the permittee shall implement an NMP no later than six months after the site achieves final stabilization. Ongoing as necessary throughout the year.
  - All NMP will be submitted to DCR at least 30 days prior to nutrient management plan expiration.
- **Annual Reporting Requirements:**
  - The status of each nutrient management plan as of June 30 of the reporting year (e.g. approved, submitted and pending approval, and expired).

#### MCM TASK 6E – Contractor Controls and Oversight

- **Description:**

Contractors who perform work on behalf of the City must use the appropriate control measures and standard procedures to control impacts to the MS4 from stormwater discharges.
- **Strategies, Objectives, & Measurable Goals:**

The City will require City Contractors have the use of appropriate control measures, through the use of contract language, training, standard operating procedures, or other measures within the City’s legal authority, to ensure that operations do not contribute to stormwater pollution. The City of Manassas Standard Contract states: *“The Contractor shall be solely responsible for complying with all applicable federal, state and municipal laws, codes and regulations during the performance of the Contract,”* which include illicit discharge, erosion and sediment control, and stormwater management ordinances. Contractors must also apply for and receive appropriate local, state, and federal permits, such as the City’s Excavation Permit and the Erosion and Sediment Control/Land Disturbing Permit, as well as follow appropriate laws and regulations. Project that go out to bid references the Virginia Erosion and Sediment Control Handbook (VESCH)the City of Manassas Design and Construction Standards Manual (DCSM), which outlines the requirements for a pollution prevention plan and erosion and sediment control plan. Land-disturbing plans will be reviewed and approved before construction and regular site inspections will be conducted to assure compliance. The City’s Standard Contract also allows for the City to *“...terminate this Contract or any work or delivery required hereunder from time-to-time either in whole or in part, whenever the Contract Administrator, with the concurrence of the Purchasing Manager, determines that such termination is in the best interest of the City.”* This clause may protect the City if the contractor is providing environmental damage to the City.

The City also assigns a project manager that provides oversight to all projects with contractors. Individual City departments are responsible for ensuring that the stormwater management

requirements are included in the procurement documents and are followed during the contracted project.

- **Responsible Departments/Employees:**
  - Engineering – Stormwater
- **Documents or SOPs Associated with Task (Completed Unless Noted Otherwise):**
  - City’s Standard Contract
  - Individual contract language
  - [City Code - Chapter 58 \(Environment\)](#)
  - [City of Manassas Design and Construction Standards Manual \(DCSM\)](#)
- **Status/Schedule of Implementation:**
  - Ongoing.
- **Annual Reporting Requirements:**
  - N/A

#### MCM TASK 6F – Implement Employee Training on Written Procedures to Minimize or Prevent Discharges

- **Description:**  
The City of Manassas shall conduct pollution prevention and good housekeeping training for City employees. Training shall be designed specifically for different City departments to explain how their daily operations and duties relate to stormwater management.
- **Strategies, Objectives, & Measurable Goals:**  
Providing the proper training to City employees will ensure that good housekeeping procedures are followed so that operations do not contribute to stormwater pollution and help improve water quality. In addition, field personnel trained in recognizing and reporting illicit discharges are additional eyes while they work out in the field and can alert other staff of potential illicit discharges. The City’s Stormwater Division will hold a Stormwater Training no less than once every 24 months, and will include the following topics:

**Table 11:**

Department (and frequency)	Division	Topics
Public Works (annual)	Fleet Maintenance	<ul style="list-style-type: none"> <li>• Recognition and reporting of illicit discharges</li> <li>• Good housekeeping and pollution prevention practices and SOPs discussed in MCM Task 6A</li> <li>• SWPPP training</li> </ul>
	Streets	
	Buildings & Grounds	
	Refuse & Recycling	
	Purchasing/Warehouse	
Utilities (annual)	Electric	
	Water & Sewer	
	Transportation	

City of Manassas Public Schools (every 24 months)	Maintenance	<ul style="list-style-type: none"> <li>• Basic spill response and reporting</li> </ul>
Engineering (annual)	Engineering/Stormwater	
Community Development (every 24 months)	Parks, Culture, & Recreation	

During this stormwater training, City stormwater staff will also ensure the following:

- All employees and contractors who apply pesticides and herbicides are properly trained and certified in accordance with the Virginia Pesticide Control Act.
- Plan reviewers, inspectors, program administrators, and construction site operators hold the proper certification as required under Virginia Erosion and Sediment Control Law.
- Applicable employees obtain the proper certifications as required by Virginia Erosion and Sediment Control Law.

The City’s Risk and Safety Analyst also will hold hazard communication trainings throughout the reporting for staff in the Departments of Public Works (Buildings & Ground and Fleet Maintenance) and Utilities (Water & Sewer). These training will discuss proper storage and disposal of hazardous chemicals as well and more thorough spill response procedures.

The City will document and maintain documentation of each training activity conducted for a minimum of three years after training activity completion. The documentation will include the following information:

- The date when applicable employees have completed the training activity;
  - The number of employees who have completed the training activity; and
  - The training objectives and good housekeeping procedures
- **Responsible Departments/Employees:**
    - Engineering – Stormwater
  - **Documents or SOPs Associated with Task (Completed Unless Noted Otherwise):**
    - Pollution Prevention SOPs from MCM Task 6A
    - Pollution Prevention/Good Housekeeping Procedure (P2/GH) Training Presentation
  - **Status/Schedule of Implementation:**
    - Training shall occur no less than once every 24 months.



- **Annual Reporting Requirements:**
  - A list of the training activities conducted in accordance with Part I E 6 d, including the following information:
    - The completion date for the training activity;
    - The number of employees who completed the training activity; and
    - The objectives and good housekeeping procedures covered by the training activity.

## TMDL SPECIAL CONDITIONS

**Part II.** All entities with a MS4 Permit are required to develop and implement a Total Maximum Daily Load (TMDL) Action Plan for which the permittee has been assigned a waste load allocation (WLA). This ensures MS4 permittees address all pollutants of concern under an approved TMDL. TMDL Action Plans identify best management practices and other management strategies that the permittee will implement to meet the pollution reduction requirements. Action Plans can be implemented in multiple stages over multiple permit cycles using an adaptive, iterative approach provided the permittee demonstrates adequate progress toward achieving reductions necessary to meet the WLA(s). The City's MS4 Permit includes special conditions to address the Chesapeake Bay TMDL and local TMDLs, which includes Bacteria and Benthic (sediment) TMDL Development for Bull Run.

### TMDL TASK 1 – Develop and Implement Chesapeake Bay TMDL Action Plan

- **Description:**

The Chesapeake Bay TMDL is a “pollution diet” used to restore clean water to the Chesapeake Bay and the region’s streams, rivers, and creeks. The City operates an MS4 in the Chesapeake Bay watershed, and as such, must develop and maintain a Chesapeake Bay TMDL Action Plan that addresses nitrogen, phosphorus, and sediment (i.e., pollutants of concern, or POCs).

In its Chesapeake Bay TMDL Watershed Implementation Plans (WIP), Virginia established a phased approach for MS4s allowing operators up to three (3) full five-year permit cycles to implement necessary pollutant reductions – pollutants of concern, or POCs (total nitrogen [TN], total phosphorus [TP], and total suspended solids/sediment [TSS]). The current permit cycle (2023-2028) requires a reduction of an additional 100% pollutants.

- **Strategies, Objectives, & Measurable Goals:**

The City will implement the tasks and strategies described in the Phase III Chesapeake Bay TMDL Action Plan, and in accordance with Part II.A. of the MS4 Permit. The City’s Phase III Chesapeake Bay TMDL Action Plan can be found here:

[https://www.manassasva.gov/engineering/all\\_about\\_stormwater/stormwater\\_documents.php#outer-1332](https://www.manassasva.gov/engineering/all_about_stormwater/stormwater_documents.php#outer-1332)

- **Responsible Departments/Employees:**

- Engineering – Stormwater

- **Documents or SOPs Associated with Task (Completed Unless Noted Otherwise):**

- Phase III Chesapeake Bay TMDL Action Plan

- **Status/Schedule of Implementation:**

- No later than 12 months after the permit effective date (November 1, 2024), the permittee shall submit a third phase Chesapeake Bay TMDL action plan for the reductions required in Part.II.A.3, A.4, and A.5 of the MS4 Permit.
- Prior to submittal of the Phase III Action plan, the City will provide an opportunity for public comment for no fewer than 15 days.

- A total 100% of pollution reduction goals will be met no later than October 31, 2028.
- Within 60 months after permit issuance, the permittee shall update the Phase III Chesapeake Bay TMDL action plan to offset the increased loads from new sources initiating construction between July 1, 2009, and October 31, 2023, and grandfathered projects that are located in the expanded 2020 census urban areas with a population of at least 50,000, and within the permittee's MS4 service area, and designed in accordance with 9VAC25-870 Part II C (not applicable to the City of Manassas).
- **Annual Reporting Requirements:**
  - The City will complete the electric Chesapeake Bay TMDL Implementation Annual Status Report in accordance with Part III.A.14 of the MS4 Permit, which will include:
    - A list of Chesapeake Bay TMDL action plan BMPs, not including annual practices, implemented prior to the reporting period
    - A list of newly implemented BMPs including annual practices implemented during the reporting period
    - If the permittee acquired credits during the reporting period to meet all or a portion of the required reductions in Part II A 3, A 4, or A 5, a statement that credits were acquired
    - Pollutant load reductions generated by annual practices, such as street and storm drain cleaning, shall only be applied to the compliance year in which the annual practice was implemented
    - The progress, using the final design efficiency of the BMPs, toward meeting the required cumulative reductions for total nitrogen and total phosphorus.
    - Any revisions made to the Chesapeake Bay TMDL action plan.
    - A list of BMPs that are planned to be implemented during the next reporting period.
      - \*Year two Chesapeake Bay TMDL implementation annual status report shall contain a summary of any public comments on the Chesapeake Bay TMDL action plan received and how the permittee responded.

## TMDL TASK 2 – Develop and Implement a Local TMDL Action Plan

- **Description:**

The City's MS4 permit requires the development of action plans for impaired streams w designed to reduce loadings for pollutants of concern if the permittee discharges the pollutants of concern to an impaired water for which a TMDL has been approved by the U.S. Environmental Protection Agency (EPA). A TMDL establishes the maximum amount of a pollutant that can enter a water body without violating water quality standards. The City must develop and implement TMDL Action Plans to address pollutants for the Bull Run Watershed TMDL's for bacteria and sediment in accordance with Part II.B. of the MS4 Permit.
- **Strategies, Objectives, & Measurable Goals:**

The City has developed this TMDL Action Plan to address wasteloads assigned to the City for the following TMDLs:



Bacteria TMDLs for Popes Head Creek, Broad Run, Kettle Run, South Run, Little Bull Run, Bull Run and the Occoquan River, Virginia, dated August 2006 and approved by the State Water Control Board (SWCB) on July 31, 2008

Benthic (sediment) TMDL Development for Bull Run, Virginia, dated June 2006 and approved by the SWCB on June 27, 2007

The City's Local TMDL Action Plan can be found here:

[https://www.manassasva.gov/engineering/all\\_about\\_stormwater/stormwater\\_documents.php#outer-1332](https://www.manassasva.gov/engineering/all_about_stormwater/stormwater_documents.php#outer-1332)

The City will update and submit to DEQ the Local TMDL Action Plan no later than 18 months after the permit effective date (May 1, 2025), and continue implementation of the action plan. Prior to submittal, the City will provide an opportunity for public comment for no fewer than 15 days on the proposal to meet the local TMDL action plan requirements. Updated action plans will include:

- An evaluation of the results achieved by the previous action plan; and
- Any adaptive management strategies incorporated into updated action plans based on action plan evaluation.

• **Responsible Departments/Employees:**

- Engineering – Stormwater

• **Documents or SOPs Associated with Task (Completed Unless Noted Otherwise):**

- City of Manassas Local TMDL Action Plan

• **Status/Schedule of Implementation:**

- The City will update and submit its Local TMDL Action Plan no later than 18 months after the permit effective date (May 1, 2025).
- Prior to submittal, the City will provide an opportunity for public comment for no fewer than 15 days on the proposal to meet the local TMDL action plan requirements.
- For the Local Sediment TMDL, no later than 36 months after the effective date of this permit, the permittee shall submit to the department an update on the progress made toward achieving local TMDL action plan goals and the anticipated end dates by which the permittee will meet each wasteload allocation.

• **Annual Reporting Requirements:**

- Summary of actions conducted to implement each local TMDL action plan. The City will update this plan annually as needed.

## REFERENCED DOCUMENTS

The below documents are referenced throughout this MS4 Program Plan and are available upon request.

- 2023 NVRC Clean Water Partner Annual Summary
- COM Educational Material
  - Park Rules 24x30 sign
  - 2020 Sediment Flyer
  - 2020 Stormwater at Construction Sites Brochure
  - City of Manassas Bulk Trash Postcard
  - Clean the Bay Day 2023 Flyer
  - Composting Postcard Citywide
  - Curbside Debris Flyer
  - Dog Park Rules
  - IDDE Flyer (English and Spanish)
  - No Mow Sign Dean Park 30x24
  - Yard Waste Bulk Pickup Flyer
- COM Farmers Market Sign-up
- NVRC MOU
- Parks, Culture, & Recreation Annual Stormwater Summary
- PWCSWCD MOU
- Event Flyers
- Keep America Beautiful (Manassas)
- General Inspection & Enforcement Procedures
- Master Complaint Log
- GIS Dataset Descriptions
- GIS Datasets
- GIS Domain Descriptions
- GIS Field Descriptions
- GIS Map Template
- [Public Storm Viewer](#) - Link
- Outfall Map and associated GIS Data
- Table of Outfalls
- 2023 Notification Letter to Regulated Downstream MS4
- 2023 Stormwater IDDE Inspection & Enforcement SOP (*draft*)
- [City Code Chapter 58, Article III - Erosion and Sedimentation Control](#)- Link
- City Ordinance #O-2024-10, Code Sec.58-115 through Sec.58-120
- 2019 Dry Weather Screening SOP
- IDDE Tracker Spreadsheet
- City of Manassas Design and Construction Standards Manual (DCSM)
- ESC Construction Inspection GIS Database
- ESC Construction Inspection Report Form Template
- Community Development SOP [for submitting Construction GPs]
- DEQ VSMP approval letter
- Stormwater Management Facility/BMP Master Inventory Spreadsheet
- DEQ BMP Warehouse Submission SOP (in development)



- SOP for Post Construction SWM Facility Inspections (2019)
- 2024 Stormwater Management Facility Management SOP (draft)
- [Chapter 58, Article IV - Virginia Stormwater Management Program - Link](#)
- Stormwater Management Facility Maintenance Agreement Template
- Stormwater Facility Inspection Report Form Templates
- Private Stormwater Management Facility Follow-up Maintenance Required Template
- General Pollution and Good Housekeeping Procedures
- De-Icing & Snow Removal Plan
  - Including the Deicer and Abrasive Usage (Salt Usage) SOP
- Street Sweeping SOP
- Debris Management Plan
- Materials Reduction Site SOP
- Material Reduction Site (MRS) SWPPP
- Nutrient Management Plans
- DCR Approval letters for Nutrient Management Plans
- City's Standard Contract
- [City Code - Chapter 58 \(Environment\) - Link](#)
- Pollution Prevention SOPS from MCM Task 6A
- Pollution Prevention/Good Housekeeping Procedure (P2/GH) Training Presentation



## MS4 PROGRAM PLAN RECORD OF REVISIONS

As part of the iterative process to reduce pollutant loading and protect water quality to the maximum extent practicable (MEP), revisions to the MS4 Program Plan are expected. The City must summarize revisions to the MS4 Program Plan as part of the MS4 annual reporting process and document these modifications in the space below.

### MS4 Program Plan Revisions

Revision Date	Program Plan Section	Revision Description	Effective Date