



# United States Department of the Interior

NATIONAL PARK SERVICE  
George Washington Memorial Parkway  
c/o Turkey Run Park  
McLean, Virginia 22101

IN REPLY REFER TO:  
1.A.2 (GWMP)

September 28, 2016

Bryant Thomas  
Regional Water Permit and Planning Manager  
Virginia Department of Environmental Quality  
Northern Regional Office  
13901 Crown Court  
Woodbridge, VA 22193

Dear Mr. Thomas:

This letter serves as the 2016 MS4 Annual Report for George Washington Memorial Parkway (GWMP) (permit registration number VAR040111).

**A. Background Information.**

1. Permittee name and permit number: George Washington Memorial Parkway, VAR040111
2. The annual report permit year and reporting period: 2016
3. Modifications to any operator's department's roles and responsibilities: none
4. Number of new MS4 outfalls and associated acreage by HUC added during the permit year: None
5. Signed certification: see enclosure

**B. Minimum Control Measure Implementation.**

1. MCM1 – Public Education and Outreach
  - a. Items relating to Permit Section II.B.1.g(1)

The park conducted several activities throughout the year:

Activity	Estimated number of people reached
Bridging the Watershed Program	155 students through 10 programs
Advertise for, coordinate and lead volunteer cleanup efforts for streams, riverside and wetland areas throughout the Parkway	Volunteers contributed over 800 hours of work during riverside cleanup activities and invasive plant removal.

Partner with local environmental groups (Friends of Dyke Marsh)	A new agreement has been put in place with the Friends of Dyke Marsh, which will conduct weekly programs in the spring and summer which will establish estimated numbers for people to be reached in the future.
August 27 <sup>th</sup> , 2016 - Educational and arts/crafts recycling activities and education about environmental conservation offered to the public.	We created bird feeders out of recycled plastic bottles, made seed balls to plant milkweed plants to help save the monarch butterflies, and made Ranger Hats. An estimated total of 90 children participated in these two activities. The activity was offered from 10-2pm and 2 people were staffing those activities, so a total of 8 employee hours were contributed.
August 27 <sup>th</sup> - The showing of Wall-E at Great Falls and environmental education activities	This was at the GRFA 50 <sup>th</sup> anniversary party. 160 people watched the movie for this activity that NPS organized.
July 30 <sup>th</sup> - Multi Sensory Nature Walk	July 30 <sup>th</sup> - Multi Sensory Nature Walk. 40 people participated in this 2 hour event. It occurred at Great Falls and we were reaching the disabilities community specifically reaching out to blind and low vision visitors of our parks. We talked about our environment and conservation, the history of Great Falls and how it is an invaluable resource. We had 5 staff on the scene and 3 SCA interns as support for this event.
Campfire conservation programs at Great Falls	Weekly campfires over summer; ranges of attendance.
August 22- Art in the Park	Programming included discussing environmental conservation and everyone painted the Least Bittern, a rare species that uses GWMP for its habitat. We had 10 participants and the activity lasted 2 hours.

GWMP has not established target audience quantities for each high priority issue.

b. Items relating to Permit Section II.B.1.g(2)

The number of people that will be reached for each high priority issue activity to be conducted during the next reporting cycle:

Activity	Estimated number of people reached
Bridging the Watershed Program	155 students
Advertise for, coordinate and lead volunteer cleanup efforts for streams, riverside and wetland areas throughout the Parkway	Over 800 hours of volunteer hours
Partner with local partner groups (Trust for the George Washington Memorial Parkway)	<p>In addition to our existing relationship with the Friends of Dyke Marsh, the park will work with newly formed groups to maximize outreach to people about the environmental issues throughout the park.</p> <p>Additional outreach includes working with area school districts and county organizations such as Alexandria City, Arlington and Fairfax Counties, and the District of Columbia.</p>
SCA Intern Crew and Leader	2 SCA interns and one adult leader worked on invasive plant removal throughout GWMP for the summer.

GWMP has not established target audience quantities for each high priority issue.

c. Status of compliance with permit conditions: The park continues to conduct education and outreach efforts through programming, partnerships, and volunteer events in the park.

d. BMP assessment: An assessment of the identified BMPs has determined that they are appropriately addressing the minimum control measures outlined in the MS4 general permit.

e. Progress toward achieving measureable goal identified in the MS4 Program Plan-The park's progress includes maintaining efforts and expanding as funding and capacity allows.

2. MCM2 – Public Involvement/Participation

a. Items relating to Permit Section II.B.2.d(1): GWMP has posted the park's MS4 program plan and annual report on our website at <http://www.nps.gov/gwmp/learn/scienceresearch.htm>. This site also includes our water quality data.

b. Items relating to Permit Section II.B.2.d(2): GWMP conducts more than a dozen clean-ups annually in which thousands of trash bags and dozens of tires are collected. Sites that have been cleaned include Belle Haven Park and Dyke Marsh Wildlife Preserve, Roaches Run, Riverside Park, sections of the Potomac Heritage Trail and Mount Vernon Trail which run along the Potomac River, Daingerfield Island, and Jones Point Park.

c. Status of compliance with permit conditions: The park meets its public involvement and participation goals through volunteer events held throughout the year.

d. BMP assessment: An assessment of the identified BMPs has determined that they are appropriately addressing the minimum control measures outlined in the MS4 general permit. Training was provided to maintenance employees on September 20, 2016.

e. Progress toward achieving measureable goal identified in the MS4 Program Plan: The park's progress includes maintaining efforts and expanding as funding and capacity allows.

3. MCM3 – Illicit Discharge Detection and Elimination

a. Items relating to Permit Section II.B.3.f(1): There are no regulated physically interconnected MS4s.

b. Items relating to Permit Section II.B.3.f(2): No information at outfalls was collected or analyzed during the reporting period. Water quality tests and monitoring were conducted at Mine Run and Pimmit Run; however, neither water body was specifically tested for the items in the General Permit Registration Statement.

c. Items relating to Permit Section II.B.3.f(3)

d. Status of compliance with permit conditions: No illicit discharges were identified in the reporting period

e. BMP assessment: An assessment of the identified BMPs has determined that they are appropriately addressing the minimum control measures outlined in the MS4 general permit. Training was provided to maintenance employees on September 20, 2016.

f. Progress toward achieving measureable goal identified in the MS4 Program Plan: The park is looking to expand its testing at the outfalls to specifically test for items listed in the General Permit Registration starting in the upcoming or following reporting year. Staffing shortages have contributed to challenges over this reporting period.

4. MCM4 – Construction Site Stormwater Runoff Control

a. Items relating to Permit Section II.B.4.f(1): There were no regulated land-disturbing activities during this reporting period.

b. Items relating to Permit Section II.B.4.f(2): There were no regulated land-disturbing activities during this reporting period.

- c. Items relating to Permit Section II.B.4.f(3): As there were no regulated land-disturbing activities during this reporting period, there were no inspections conducted.
- d. Items relating to Permit Section II.B.4.f(4): There were no enforcement actions taken the reporting period
- e. Status of compliance with permit conditions: There were no land-disturbing activities identified during the reporting period.
- f. BMP assessment: An assessment of the identified BMPs has determined that they are appropriately addressing the minimum control measures outlined in the MS4 general permit. Training was provided to maintenance employees on September 20, 2016.
- g. Progress toward achieving measureable goal identified in the MS4 Program Plan: No new construction is anticipated for the upcoming reporting period.

5. MCM5 – Post-Construction Stormwater Management

- a. Items relating to Permit Section II.B.5.e: No new storm water management facilities were brought online during the reporting period
- b. Status of compliance with permit conditions: There was no post-construction activities identified during this reporting period.
- c. BMP assessment: An assessment of the identified BMPs has determined that they are appropriately addressing the minimum control measures outlined in the MS4 general permit.
- d. Progress toward achieving measureable goal identified in the MS4 Program Plan: No new construction is anticipated for the upcoming reporting period.

6. MCM6 – Pollution Prevention/Good Housekeeping for Municipal Operations

- a. Items relating to Permit Section II.B.6.g(1): GWMP is working on developing written procedures using an interdisciplinary team approach, and intend to have the final procedures in place by the end of the next reporting year. Stormwater pollution prevention training for maintenance staff occurred on September 20, 2016 for 40 employees.
- b. Items relating to Permit Section II.B.6.g(2): Fort Hunt Park was identified as requiring the development of a Storm Water Pollution Prevention Plan (SWP3) because the area includes a small maintenance facility where materials are stored, including a salt storage facility. The three aboveground storage tanks (AST) were removed from Fort Hunt in September 2016. The USTs at the Parkway Maintenance facility were inspected by the VADEQ and tested by an external contractor on September 22, 2016. The SWP3 is being updated and George Washington Memorial Parkway will be working in the upcoming reporting year to complete the SWP3 and begin implementation. A Spill Prevention Control and Countermeasures plan was finalized in 2014, and employee training occurred on September 20, 2016. In addition, stormwater outfalls within the Maintenance Facility were mapped and identified as to the receiving facility – either the oil/water separator, or natural stream. Potential spill locations were also identified and mapped; spill kits were inventoried, replenished, and mapped, and employees were provided with a map including all of this information, in addition

to it being posted around the maintenance bays. Procedures for identifying pollution and responding to it were conveyed during the September 20th training, and a number of personnel have attended HAZWOPER training in order to increase the number of personnel qualified to respond to spill incidents.

c. Items relating to Permit Section II.B.6.g(3) : GWMP does not have a nutrient management plan for any sites. We are seeking assistance from the National Capital Region in developing nutrient management plans and developing a project to compete for funding through NPS. GWMP continues to fertilize a total of 21 acres at the rate of 2 pounds of actual nitrogen per year, which equates to a total of 42 pounds of actual nitrogen per year. The sites fertilized are:

- o Memorial Avenue
- o Women in Military Service for America Memorial
- o Arlington House, The Robert E. Lee Memorial
- o U.S. Marine Corps War Memorial

d. Items relating to Permit Section II.B.6.g(4): GWMP held one park-specific training session during the current reporting period. On September 20, 2016, training was offered to all employees who utilize GWMP's maintenance facility to educate employees about the facility's responsibilities to ensure compliance with its MS4 permit including best practices to reduce pollution in stormwater run-off. Additional training for both maintenance and general parkway staff is planned during the upcoming reporting period.

e. Status of compliance with permit conditions: The park continues to work on improvements to its good housekeeping efforts and is working to implement an internal environmental audit procedure

f. BMP assessment: An assessment of the identified BMPs has determined that they are appropriately addressing the minimum control measures outlined in the MS4 general permit.

g. Progress toward achieving measureable goal identified in the MS4 Program Plan: The park has re-established the Environmental Committee with the recent hiring of a permanent Environmental Protection Specialist. Planning and response documents are being assessed and updated to reflect current staffing and requirements.

C. Results of information collected and analyzed, including monitoring data, if any, during the reporting period: No information was collected during the reporting period.

D. A summary of the stormwater activities the operator plans to undertake during the next reporting cycle: Site rehabilitation is planned for calendar year 2017-2018 at Arlington House, The Robert E. Lee Memorial, and the U.S. Marine Corps War Memorial, which will involve ground-disturbing activities. Stormwater BMPs will be implemented.

E. A change in any identified best management practices or measurable goals for any of the minimum control measures including steps to be taken to address any deficiencies: All pertinent plans are being reviewed and updated. Recycling programs for difficult items to recycle (Keurig cups, office supplies, snack packaging) have launched this year. Internal informal environmental

audits have begun within the park to identify areas of concern and to help apply the training that was provided to employees.

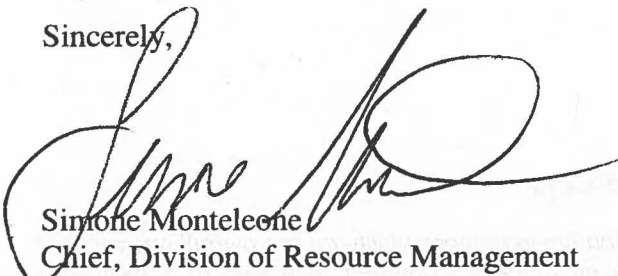
F. Notice that the operator is relying on another government entity to satisfy some of the state permit obligations (if applicable): N/A

G. The approval status of any programs pursuant to Section II.C of the general permit (if appropriate), or the progress towards achieving full approval of these programs: N/A

H. Information required for any applicable TMDL special condition contained in Section I of the general permit: N/A

The George Washington Memorial Parkway and the Division of Resource Management is committed to meeting our responsibilities and reporting requirements under the MS4 General Permit. Should you need any additional information, please contact Brenda Wasler at 703-289-2540 or at [brenda\\_wasler@nps.gov](mailto:brenda_wasler@nps.gov).

Sincerely,



Simone Monteleone  
Chief, Division of Resource Management  
George Washington Memorial Parkway

Enclosures

cc: Environmental Protection Specialist, GWMP



### Certification Statement and Requirements

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

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

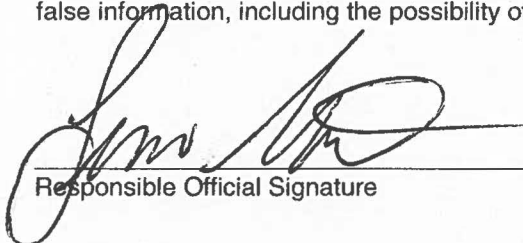
### Duly Authorized Representatives


A person is a duly authorized representative only if:

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

### CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

  
Responsible Official Signature

  
Date

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VA040111      George Washington Memorial Parkway  
Permit Number      MS4 Name