

# *City of Alexandria, Virginia*

## MEMORANDUM

**DATE:** AUGUST 27, 2025  
**TO:** JAMES PARAJON, CITY MANAGER  
**FROM:** ROBERT SNYDER, CHIEF INTERNAL AUDITOR  
**SUBJECT:** T&ES VDEQ MS4 PROGRAM AUDIT (FS26-02)

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### **Background**

On April 9, 2025 the City of Alexandria's Stormwater Management division of the Transportation and Environmental Services (T&ES) Department received notification from the Virginia Department of Environmental Quality (VDEQ) to schedule a routine audit of the City's Municipal Separate Storm Sewer System's (MS4) Permit Program. This permit program requires Cities, Counties, and other entities to obtain permits to operate their stormwater systems. The permits also outline requirements and best management practices that minimize the discharge of pollution.

**Note: T&ES does not receive any direct funding from VDEQ as part of the MS4 permit.**

### **Discussion**

The onsite evaluation was conducted on May 1, 2025. There were several programmatic elements that were reviewed including:

- Public Education and Outreach
- Public Involvement and Participation
- Illicit Discharge Detection and Elimination
- Construction Site Stormwater Runoff
- Post-Construction Stormwater Management
- Pollution Prevention/Good Housekeeping for Permittee Facilities
- Overall Program Management.

For each of the sections mentioned above there was a comprehensive checklist that tested the compliance of the respective element.

Note: During the on-site portion of the audit VDEQ was accompanied by City staff to conduct inspections of two construction sites: Alexandria Housing Development and West End Infrastructure. There were seven (7) corrective actions issued as a results of this inspection.

However, it is important to note that not only were the corrective measures taken well in advance of the deadline but also the observations were not made to the City but rather to the **Alexandria Housing Development Corporation, and to West End Infrastructure**. The City just assisted in closing out the observations and helped to make the corrective actions.

### **Prior Audit Engagements**

The last audit of the MS4 Permit Program occurred in FY2021. In the prior audit the City was given nine (9) audit recommendations five (5) corrective actions which were all closed out after the corrective action plan was completed. However, we can see drastic improvement from the prior audit to the current one as there were no findings for this years audit.

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**Table 1 Summary of Prior Audits and Engagements**

<b>Date</b>	<b>Engagement Name</b>	<b>Notes</b>
7/13/2020	FS21-01 VDEQ MS4 Audit	During this audit VDEQ had nine (9) audit recommendations and five (5) audit corrective actions.

### **Conclusion**

On July 17, 2025 VDEQ issued the report informed the City that there were no areas of non-compliance identified during the audit. Furthermore, because of the lack of non-compliance areas/findings there was no need for corrective actions and VDEQ would not be requesting any response from the City. Due to the lack of findings OIA considers this report to be closed effective the date of this memorandum. Please contact the Office of Internal Audit at [OIA@alexandriava.gov](mailto:OIA@alexandriava.gov) should you have any questions.



*Commonwealth of Virginia*

*VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY*

[www.deq.virginia.gov](http://www.deq.virginia.gov)

Stefanie K. Taillon  
Secretary of Natural and Historic Resources

Michael S. Rolband, PE, PWD, PWS Emeritus  
Director

July 17, 2025

[REDACTED]  
Division Chief, Stormwater Management, Transportation and Environmental Services  
City of Alexandria  
1800 Limerick Drive, Suite 500  
Alexandria, VA US 22314

RE: MS4 Program Audit Report, City of Alexandria, Registration # VAR040057

Dear [REDACTED]:

The Virginia Department of Environmental Quality (DEQ) would like to thank you and your team for your time and assistance during the May 1, 2025 audit of the City of Alexandria MS4 Program. With this letter is a copy of the MS4 Program Audit report. **No corrective actions were identified during the audit; therefore, no response is requested at this time.**

Thank you for your continued efforts in implementing the MS4 Program. If you have any questions about the inspection report or about the MS4 Program, please feel free to contact me using the details below.

Sincerely,

[REDACTED]

[REDACTED], MS4 Coordinator  
Virginia Department of Environmental Quality  
571-866-6086  
[REDACTED]@deq.virginia.gov  
Northern Regional Office  
13901 Crown Court  
Woodbridge, Virginia 22193  
571-866-3800  
Enclosure

c: [REDACTED], State MS4 Compliance Coordinator, DEQ Central Office  
[REDACTED], Senior Environmental Specialist/CE III, City of Alexandria, VA

**Virginia Department of Environmental Quality  
Municipal Separate Storm Sewer System (MS4)  
Compliance Audit Checklist**

<b>MS4 Name:</b> City of Alexandria	<b>Permit No:</b> VAR040057	
<b>MS4 Contact (Name/Title):</b> [REDACTED], Division Chief	<b>Email:</b> [REDACTED]@alexandriava.gov	
<b>Date of Audit/Inspection:</b> May 1, 2025	<b>Notified of Audit/Inspection:</b> April 9, 2025	
<b>DEQ Region:</b> NRO	<b>Weather (Wet/Dry/Rain):</b> Dry, 80° F	
<b>Date Report Issued:</b> July 17, 2025	<b>Response Due Date:</b> No response required.	
<b>DEQ Staff Present:</b> [REDACTED], MS4 Coordinator, Northern Regional Office; Michael Weitekamp, Stormwater Compliance Specialist, Northern Regional Office		
<b>Reviewed by/Date:</b> [REDACTED], June 20, 2025		
<b>Type of Inspection:</b> <input checked="" type="checkbox"/> Audit <input type="checkbox"/> Inspection/Focused <input type="checkbox"/> Desktop Audit		
<b>Programmatic Elements Reviewed:</b> <div style="display: flex; flex-wrap: wrap;"> <div style="width: 50%;"> <input checked="" type="checkbox"/> Overall Program Management  <input checked="" type="checkbox"/> Public Education and Outreach (MCM1)  <input checked="" type="checkbox"/> Public Involvement and Participation (MCM2)  <input checked="" type="checkbox"/> Illicit Discharge Detection and Elimination (MCM3)         </div> <div style="width: 50%;"> <input checked="" type="checkbox"/> Construction Site Stormwater Runoff (MCM4)  <input checked="" type="checkbox"/> Post-Construction Stormwater Management (MCM5)  <input checked="" type="checkbox"/> Pollution Prevention/Good Housekeeping for Permittee Facilities (MCM6)         </div> </div>		
<b>MS4 Permittee Representatives Present:</b>		
<b>Name and Title:</b>	<b>Department:</b>	<b>Email:</b>
[REDACTED], Senior Environmental Specialist	Transportation & Environmental Services	[REDACTED]
[REDACTED], Stormwater Management Division Chief	Transportation and Environmental Services	[REDACTED]
[REDACTED], Water Quality Compliance Specialist	Transportation and Environmental Services	[REDACTED]

**Permittee: City of Alexandria (VAR040057)**  
**MS4 Audit Report**



██████████, Stormwater Principal Planner	Transportation and Environmental Services	██████████@alexandriava.gov
██████████ Stormwater Plan Reviewer	Transportation and Environmental Services	██████████@alexandriava.gov
██████████, Management Analyst	Transportation and Environmental Services	██████████@alexandriava.gov
██████████, Street & Sewer Maintenance Division Chief	Transportation and Environmental Services	██████████@alexandriava.gov
██████████, Inspector III	Transportation and Environmental Services	██████████@alexandriava.gov
██████████, Inspector III	Transportation and Environmental Services	██████████@alexandriava.gov
██████████, Deputy Director - Engineering & Right of Way	Transportation and Environmental Services	██████████@alexandriava.gov
██████████, Permits & Inspection Division Chief	Transportation and Environmental Services	██████████@alexandriava.gov
██████████, Inspector III	Transportation and Environmental Services	██████████@alexandriava.gov
██████████, Parts Specialist	T&ES Fleet	██████████@alexandriava.gov
██████████, Auto Diagnostician	T&ES Fleet	██████████@alexandriava.gov
██████████, Super Fire Maintenance	Alexandria Fire Department	██████████@alexandriava.gov

**Opening Conference Notes:**

The City of Alexandria (or “Alexandria”, “City”, or “the permittee”) MS4 audit included a thorough pre-audit document review, and a one-day field inspection held on Tuesday, May 1, 2025. The weather at the time of the field inspection was clear with highs in the low 80s. The previous precipitation event occurred on April 26, 2025, totaling 0.55 inches of rain, according to the nearest weather station (Washington Reagan National Airport) listed on the National Weather Service’s NOW Data (NOAA Online Weather Data). The audit covered the entire MS4 program including Overall Program Management and MCM1 through MCM6 (Minimum Control Measures). During this audit, DEQ and permittee staff discussed questions and observations regarding the MS4 program.

<b>Overall MS4 Program Management</b>		<input type="checkbox"/> N/A – Section Not Evaluated		
<b>Questions</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
1. Has the permittee developed and implemented and enforced an MS4 program designed to reduce the discharge of pollutants from the MS4 to the maximum extent practicable (MEP)? ( <i>Part I.B</i> )		X		
2. Does the MS4 program plan include the six minimum control measures (MCMs) described in Part I.E. of the permit? ( <i>Part I.C.1.c</i> )		X		

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<b>Overall MS4 Program Management</b>		<input type="checkbox"/> N/A – Section Not Evaluated		
Questions		Yes	No	N/A
3.	Does the MS4 program plan include the roles and responsibilities of all permittee divisions and departments that are responsible for implementing permit requirements? ( <i>Part I.C.1.a</i> )	X		
4.	If another entity is utilized by the permittee to implement portions of the MS4 program, does the MS4 program plan include a copy of any written agreements (with a description of each party's roles and responsibilities)? (If yes, include entity and responsibility in Audit Notes and Comments below. <i>Part I.C.1.b</i> )	X		
5.	Does the MS4 program plan include each specific requirement as listed in Part I E. for each MCM? ( <i>Part I.C.1.c (1)</i> )	X		
6.	Does the MS4 program plan include a description of best management practices (BMPs) or strategies the permittee plans to implement to comply with permit conditions in Part I E? ( <i>Part I.C.1.c.(2)</i> )	X		
7.	Does the MS4 program plan include all standard operating procedures (SOPs) or policies necessary to implement BMPs for each MCM? ( <i>Part I.C.1.c.(3)</i> )	X		
8.	Does the MS4 program plan include measurable goals by which BMPs or strategies for each MCM will be evaluated? ( <i>Part I.C.1.c.(4)</i> )	X		
9.	Does the MS4 program plan include the persons, positions, or departments responsible for implementing each BMP or strategy for each MCM? ( <i>Part I.C.1.c.(5)</i> )	X		
10.	Does the MS4 program plan include a list of documents (e.g., SOPs, policies, local TMDL action plans, ordinances, MOUs, etc.) that are incorporated by reference including the version and date of the document being incorporated? ( <i>Part I.C.1.d</i> )	X		
11.	Has the permittee developed and implemented a Chesapeake Bay TMDL action plan? ( <i>Part II.A</i> )	X		
12.	Has the permittee updated the Chesapeake Bay TMDL action plan with the applicable schedule in Part II.A.12?	X		
13.	Has the permittee developed and implemented TMDL action plans for applicable local TMDLs? ( <i>Part II.B</i> )	X		
14.	Has the permittee developed and/or updated local TMDL action plans with the applicable schedule contained in Part II.B 1 or 2?	X		
15.	Are local TMDL action plans incorporated by reference into the MS4 program plan? ( <i>Part II.B.10</i> )	X		
16.	Has the permittee developed and maintained written inspection and maintenance procedures to ensure adequate long-term operation and maintenance of ecosystem restoration projects that were implemented as a part of a TMDL action plan developed in accordance with Part II A or B or both? ( <i>Part II.C.1</i> )	X		
17.	Has the permittee inspected ecosystem restoration projects owned or operated by the permittee implemented as a part of a TMDL action plan developed in accordance with Part II A or B no less than once every 60 months? ( <i>Part II.C.2</i> )	X		

**Audit Notes and Comments-Overall MS4 Program Management:**

Q3, Q9: The City of Alexandria's Stormwater Division, within the Department of Transportation and Environmental Services (T&ES), is the primary responsible party for coordination and implementation of the MS4 Program. Responsibilities include the submittal of annual reports, updating the program plan, ensuring compliance with Environmental Management Ordinance, administration of the VESMP and CBPA Programs, stormwater Capital Improvement Projects (CIP), and the stormwater and floodplain management program. Several other departments and divisions implement portions of the MS4 permit. The Department of Planning and Zoning reviews site development plans. Within T&ES, the Permit and Inspection division inspect private construction sites and oversees work in the right-of-way; the Street and Sewer Maintenance division inspects and maintains the private storm sewer system and publicly owned BMPs; Resource Recovery division conducts refuse collection, street sweeping, maintains the recycling center and household hazardous waste drop-off program; and the Department of Project Implementation provides project management for CIP projects. The term "private" storm sewer system, as shown in the Organization Chart, may be an error; if so, it is recommended to change this to "public storm sewer system".

Q4: The City of Alexandria participates in the Northern Virginia Regional Commission (NVRC) Clean Water Partners program and includes a memorandum of understanding in the Program Plan appendices.

Q11, Q12: The third Chesapeake Bay TMDL Action Plan was submitted to DEQ on November 1, 2024, in accordance with Part II.A.12.b of the MS4 permit. The Chesapeake Bay TMDL Action Plan was reviewed by DEQ staff. A formal review letter was submitted to the permittee on February 14, 2025, and the response/corrections were submitted on March 18, 2025.

Q13, Q14: According to DEQ records, local Total Maximum Daily Loads (TMDLs) approved by the Environmental Protection Agency (EPA) that name the permittee as having a waste load allocation (WLA) are provided below, with the applicable EPA approval date shown:

- Fecal Coliform TMDLs for Four Mile Run (Non-tidal) (approved by EPA on 5/31/2002) do not list WLAs for the permittee, however the City took a proactive approach and integrated the aforementioned TMDL into the combined Bacteria TMDL Action Plan.
- Bacteria TMDLs for the Tidal Four Mile Run Watershed (approved by EPA on 6/14/2010) list aggregate WLAs for the permittee.
- Bacteria TMDLs for the Hunting Creek, Cameron Run, and Holmes Run Watershed (approved by EPA on 11/10/2010) list aggregate WLAs for the permittee.
- TMDL of PCBs for Tidal Portions of the Potomac and Anacostia Rivers TMDL Report (approved by EPA on 10/31/2007) list WLAs for the permittee.

The permittee developed local TMDL action plans for each of the aforementioned TMDLs. The permittee submitted updated TMDL action plans to DEQ on April 30, 2025. A formal DEQ review of the local TMDL Action Plans will take place separately from the audit.

Q16, Q17: The permittee has implemented a stream restoration project. The stream restoration is treated as SMF, therefore, the written inspection and maintenance procedures for ecosystem restoration projects (which include stream restorations, see 9VAC25-890-1) are based on approved BMP Clearinghouse Guidance for each BMP type. The maintenance and inspection procedures for these practices are included in the Post-Construction BMP Guidance in the Program Plan.



**Items of Non-Compliance identified in the questions above:**

N/A

<b><u>Public Education and Outreach (MCM 1)</u></b>		<input type="checkbox"/> N/A – Section Not Evaluated		
<b>Questions</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
1.	Does the permittee implement an existing public education and outreach program? ( <i>Part I.E.1</i> )	X		
2.	Is the public education and outreach program designed to increase the public's knowledge of how to reduce stormwater pollution? ( <i>Part I.E.1.a.(1)</i> )	X		
3.	Does the public education and outreach program prioritize the reduction of impacts to impaired waters and other local water pollution concerns? ( <i>Part I.E.1.a.(1)</i> )	X		
4.	Is the public education and outreach program designed to increase the public's knowledge of hazards associated with illegal discharges and improper disposal of wastes? ( <i>Part I.E.1.a.(2)</i> )	X		
5.	Does the public education and outreach program utilize strategies that are targeted toward individuals or groups most likely to have significant stormwater impacts? ( <i>Part I.E.1.a.(3)</i> )	X		
6.	Did the permittee identify a minimum of three high-priority issues for its public education and outreach program? ( <i>Part I.E.1.b</i> )	X		
7.	Does the public education and outreach program clearly identify no fewer than three high-priority issues and explain why the high priority issues are important? ( <i>Part I.E.1.c.(2)</i> )	X		
8.	Does the public education and outreach program include measures or actions the public may take in order to minimize the impact of the high-priority issues? ( <i>Part I.E.1.c (3)</i> )	X		
9.	Does the public education and outreach program include a contact and telephone number, website or location where the public can find out more information? ( <i>Part I.E.1.c.(4)</i> )	X		
10.	Does the permittee use a minimum of two strategies from Table 1 of Part I.E.1.d per year to communicate to the target audience the identified high-priority issues?	X		
Check all of the strategies used by the permittee to communicate the high-priority issues:				



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<b><u>Public Education and Outreach (MCM 1)</u></b>		<input type="checkbox"/> <b>N/A – Section Not Evaluated</b>		
<b>Questions</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
<input checked="" type="checkbox"/> Traditional Written Materials <input checked="" type="checkbox"/> Alternative Materials <input checked="" type="checkbox"/> Signage <input checked="" type="checkbox"/> Media Materials <input checked="" type="checkbox"/> Speaking Engagements <input type="checkbox"/> Curriculum Materials <input type="checkbox"/> Training Materials <input type="checkbox"/> Public Education Activities <input type="checkbox"/> Public Meetings				
11. Does the permittee MS4 coordinate its public education and outreach efforts with other MS4s? ( <i>Part I.E.1.e</i> )		X		
12. Does the MS4 program plan include a list of the high priority issues the permittee identified for its public education and outreach program? ( <i>Part I.E.1.f. (1)</i> )		X		
13. Does the MS4 program plan include the rationale for selection of each issue and explain how each education/outreach strategy is intended to have a positive impact on stormwater discharges? ( <i>Part I.E.1.f. (2)</i> )		X		
14. Does the MS4 program plan identify the target audiences to receive each high-priority stormwater message? ( <i>If yes, please list audiences in the Audit Notes and Comments below. Part I.E.1.f. (3)</i> )		X		
15. Does the MS4 program plan include the strategies used to communicate each high-priority stormwater message? ( <i>Part I.E.1.g.(2)</i> )		X		
16. Does the MS4 program plan include the anticipated time periods the messages will be communicated or made available to the public? ( <i>Part I.E.1.f.(8)</i> )		X		
17. Does the permittee correctly separate staff training as required in Part I. E. 6. d. from the public education and outreach program? ( <i>Part I.E.2. f. and g</i> )		X		

**Audit Notes and Comments-Public Education and Outreach (MCM 1):**

Q6-Q8, Q10, Q12-Q17: The program plan identified the following three high priority stormwater issues: (1) Chesapeake Bay Nutrients (Phosphorus and Nitrogen), (2) pet waste and (3) illicit discharges/trash. The program plan lists a description of strategies (traditional written materials, alternative materials, signage, media materials, and speaking engagements), impact on stormwater, target audience, responsible parties, implementation schedule, documentation, and measurable goals. The City uses creative marketing to reduce pet waste, such as the “There’s no such thing as the poop fairy” materials and signage. Pamphlets outlining the high priority issues are distributed at outreach events, along with overarching the message to the community to report any pollution concerns by dialing #311. The City transitioned to the Alex311 for the pollution reporting system, among other City services.

Q11: The permittee is a member of the Northern Virginia Clean Water Partners, which coordinates public education and outreach efforts with other MS4s.

**Items of Non-Compliance identified in the questions above:**

N/A

<b>Public Involvement and Participation (MCM 2)</b>		<input type="checkbox"/> N/A – Section Not Evaluated		
<b>Questions</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
1.	Are procedures in place for the public to report potential illicit discharges, improper disposal or spills to the MS4, complaints regarding land disturbing activities or other stormwater pollution concerns? ( <i>Part I.E.2.a.(1)</i> )	X		
2.	Are procedures in place for the public to provide comments on the permittee's MS4 program plan? ( <i>Part I.E.2.a.(2)</i> )	X		
3.	Do the procedures in Question 1 and 2 above describe how the permittee responds to public comments received and how the permittee maintains documentation of the public comments received and the permittee's response? ( <i>Part I.E.2.a. (3) and (4)</i> )	X		
4.	Does the permittee maintain a webpage dedicated to the MS4 program and stormwater pollution prevention? ( <i>Part I.E.2.b</i> )	X		
5.	Are the MS4 General Permit and permit coverage letter posted on the webpage? ( <i>Part I.E.2.b.(1)</i> )	X		
6.	Is the most current MS4 program plan, or a location where the MS4 program plan can be obtained, posted on the webpage? ( <i>Part I.E.2.b.(2)</i> )	X		
7.	Are all annual reports for this permit term posted on the webpage? ( <i>Part I.E.2.b.(3)</i> )	X		
8.	For permittees that are partially or entirely within the Chesapeake Bay watershed, does the permittee maintain the most recent Chesapeake Bay TMDL action plan on the webpage or describe on the webpage where the most recent Chesapeake Bay TMDL action plan can be obtained? ( <i>Part I.E.2.b.(4)</i> )	X		
9.	For permittees that are partially or entirely within the Chesapeake Bay watershed, does the permittee maintain all Chesapeake Bay TMDL implementation annual status reports for this permit term on the webpage? ( <i>Part I.E.2.b.(5)</i> )	X		
10.	Does the webpage contain a mechanism (e.g., "hotline") for the public to report illicit discharge, improper disposal, spills to the MS4, complaints about land-disturbing activities, or stormwater pollution concerns? ( <i>Part I.E.2.b.(6)</i> )	X		
11.	Does the webpage provide methods for the public to give input on the MS4 program plan and, where applicable, the Chesapeake Bay TMDL action plan? ( <i>Part I.E.2.b.(7)</i> )	X		
12.	If the permittee is a state or federal nontraditional permittee with security policies that prevent the MS4 program and stormwater pollution prevention webpage from being publicly accessible, does the permittee maintain an internal staff accessible webpage (e.g., intranet) to meet the requirements of Part I.E.2.b? ( <i>Part I.E.2.b.(8)</i> )			X
13.	If the permittee meets the definition of a traditional permittee (9VAC25-890-1), do they implement a minimum of four activities per year for the public to become involved in improving water quality and supporting local restoration and clean-up projects? ( <i>Part I.E.2.c</i> )	X		
14.	If the permittee meets the definition of a nontraditional permittee (9VAC25-890-1), do they implement, promote, participate in or coordinate no fewer than four activities per year from two or more categories from Table 2 in Part I.E.2 to provide an opportunity for public involvement to improve water quality and support local restoration and clean-up projects? ( <i>Part I.E.2.d</i> )			X
15.	Do the activities (described in Questions 13 or 14 above) fall into at least two categories from Table 2 in Part I.E.2.d below?  Check all of the categories used by the permittee to provide an opportunity for public involvement:  <input checked="" type="checkbox"/> Monitoring <input checked="" type="checkbox"/> Restoration <input checked="" type="checkbox"/> Public Education Activities <input type="checkbox"/> Public Meetings <input checked="" type="checkbox"/> Disposal or Collection Events <input checked="" type="checkbox"/> Pollution Prevention	X		

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<b><u>Public Involvement and Participation (MCM 2)</u></b>		<input type="checkbox"/> <b>N/A – Section Not Evaluated</b>		
<b>Questions</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
16. Does the permittee ensure that their public participation events required by Part I.E.2.c or Part I.E.2.d do not solely include or are limited to staff participants with stormwater, groundskeeping, and maintenance duties? <i>(Part I.E.2.f.)</i>		X		
17. Does the permittee ensure staff training required by Part I.E.6.d does not qualify as a public participation event unless the training activity solicits participation from target audiences beyond staff or contractors with stormwater, groundskeeping, and maintenance duties? <i>(Part I.E.2.g.)</i>		X		
18. Does the MS4 program plan include the webpage address where mechanisms for 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 are located? <i>(Part I.E.2.h.(1))</i>		X		
19. Does the MS4 program plan include the webpage address that contains the methods for how the public can provide input on the permittee's MS4 program? <i>(Part I.E.2.h.(2))</i>		X		
20. Does the MS4 program plan include a description of the public involvement activities to be implemented, the anticipated time period the activities will occur and a metric for each activity to determine if the activity is beneficial to water quality? <i>(Part I.E.2.h.(3))</i>		X		

**Audit Notes and Comments-Public Involvement and Participation (MCM 2):**

Q2, Q3: The MS4 Program Plan documented general procedures for receiving, responding to and documenting reports of illicit discharges and general comments/input on the MS4 program. The permittee's stormwater webpage includes an email address for submitting general comments or input on the MS4 program and a Stormwater Management Division phone number and Alex311 website for submitted illicit discharges or other potential stormwater pollution concerns.

Q10, Q11: The permittee's stormwater webpage includes an Illicit Discharge webpage that include directions for calling the Alexandria Fire Department at 911 for oil/petroleum spills and using the Stormwater Management Divisions phone number or Alex 311 for other illicit discharge concerns. The MS4 webpage includes an email address the public can use to provide general comments or input on the MS4 program and Program Plan.

Q12: "N/A" was selected because the facility is not a state or federal nontraditional permittee with security policies that prevent the MS4 program and stormwater pollution prevention webpage from being publicly accessible.

Q14: "N/A" was selected because the facility is a traditional permittee.

Q15: According to the MS4 Program Plan, the permittee will implement no less than four activities per year from two or more categories as follows: (1) two clean-ups per year (Restoration) with partnerships such as the Alice Ferguson Foundation Trash Free Potomac Watershed Initiative, Clean the Bay Day, or Clean Virginia Waterways Cleanup, (2) two educational events per year (Public Education Activities), such as Earth Month, Student Environmental Action Showcase, or Bike to Work Day, (3) stream monitoring workshop through Save Our Streams (Monitoring), (4) Household Hazardous Waste and Electronic Collections (Disposal or Collection Event), and (5) storm drain marking with volunteers and private developers and maintenance of pet waste stations (Pollution Prevention). Metrics for measuring the benefits to water quality are also described in the MS4 Program Plan for each of these activities. Metrics include the number of participants at events, evaluation of each event, and number of volunteers marking storm drains.

During the audit, Alexandria staff highlighted a few of the recent public involvement and participation activities. According to staff, the City recently increased the stormwater utility credit applicability and has seen an increase in the reporting of stormwater practices. At the end of April 2025, the City held a rain barrel workshop, distributing 32 rain barrels to residents. To date, over 5,000 rain barrels have been distributed. For Earth Month, staff held a STEAM (Science, Technology, Education, Art, Math) event that included inlet markings and educational activities with school aged children at Ben Brenman Park.

**Items of Non-Compliance identified in the questions above:**

N/A

<b><u>Illicit Discharge Detection and Elimination (MCM 3)</u></b>		<input type="checkbox"/> N/A – Section Not Evaluated		
<b>Questions</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
1.	Does the permittee maintain an updated and accurate MS4 map of the area owned/operated by the permittee within the 2020 census urban areas with a population of at least 50,000 (or within the 2010 Census Urbanized Area) which has been updated by November 1, 2025? ( <i>Part 1.E.3.a(1)</i> )	X		
2.	Does the permittee maintain an updated and accurate MS4 map with all known outfalls and/or points of discharge? ( <i>Part 1.E.3.a(1)(a)</i> )	X		
3.	Does the map include unique identifiers for each mapped item? ( <i>Part 1.E.3.a(1)(b)</i> )	X		
4.	Does the map include the name and location of receiving waters? ( <i>Part 1.E.3.a(1)(c)</i> )	X		
5.	Does the map include the MS4 regulated service area ( <i>Part 1.E.3.a(1)(d)</i> )	X		
6.	Does the MS4 map contain all Stormwater Management Facilities (SMFs) owned or operated by the permittee? ( <i>Part 1.E.3.a.(1)(e)</i> )	X		
7.	Does the permittee maintain an updated and accurate information table for outfalls/points of discharge that is associated with the MS4 map? ( <i>Part 1.E.3.a.(2)</i> )	X		
8.	Does the information table contain the unique identifier for each outfall/point of discharge and operator owned SMF as specified on the MS4 map? ( <i>Part 1.E.3.a.(2)(a)</i> )	X		
9.	Does the information table have the latitude and longitude for each outfall/point of discharge? ( <i>Part 1.E.3.a.(2)(b)</i> )	X		
10.	Does the information table have the estimated regulated service area draining to each outfall/point of discharge? ( <i>Part 1.E.3.a.(2)(c)</i> )	X		
11.	Does the information table have the name of the receiving water to which each outfall/point of discharge discharges? ( <i>Part 1.E.3.a.(2)(d)</i> )	X		

<b><u>Illicit Discharge Detection and Elimination (MCM 3)</u></b>		<input type="checkbox"/> N/A – Section Not Evaluated		
<b>Questions</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
12.	Does the information table include the 6 <sup>th</sup> Order Hydrologic Unit Code (6 <sup>th</sup> Order HUC) of the receiving water? ( <i>Part I.E.3.a.(2)(e)</i> )	X		
13.	Does the information table indicate whether or not each receiving water is listed as impaired in the Virginia 2022 305(b)/303(d) Water Quality Assessment Integrated Report? ( <i>Part I.E.3.a.(2)(f)</i> )	X		
14.	Does the information table have the name of any EPA approved TMDLs for which the permittee is assigned a waste load allocation? ( <i>Part I.E.3.a.(2)(g)</i> )	X		
15.	Did the permittee submit a format file geodatabase or two shapefiles of the MS4 map to DEQ by the November 1, 2025, deadline that includes all items described in Part I.E.3.a(3) and submitted according to the data format standards outlined in Part I.E.3.a(4)?			X
16.	Does the permittee update the MS4 map and information table with new outfalls and approved TMDLs by October 1 each year? ( <i>Part I.E.3.a.(5)</i> )	X		
17.	Has the permittee provided written notification to downstream adjacent MS4s of any known physical interconnections established or discovered after the effective date of this permit? ( <i>Part I.E.3.a.(6)</i> )	X		
18.	Has the permittee prohibited (by ordinance, policy, SOP, or other legal mechanism) unauthorized non-stormwater discharges into the storm sewer system? ( <i>Part I.E.3.b</i> )	X		
19.	Does the permittee have written procedures for illicit discharge detection and elimination (IDDE)? ( <i>Part I.E.3.c.</i> )	X		
20.	Are the written procedures designed to detect, identify, and address unauthorized non-stormwater discharges, including illegal dumping, to the MS4? ( <i>Part I.E.3.c</i> )	X		
21.	Do the written IDDE procedures include a description of the legal authorities (ordinances, policies, SOPs, etc.) available to the permittee to eliminate sources of ongoing illicit discharges, as well as procedures for using legal enforcement authorities? ( <i>Part I.E.3.c.(1)</i> )	X		
22.	Do the written IDDE procedures include dry weather field screening protocols to detect, identify, and eliminate illicit discharges to the MS4? ( <i>Part I.E.3.c.(2)</i> )	X		
23.	Do dry weather screening protocols include a prioritized schedule (and rationale for that prioritization) for field screening based on criteria such as age of infrastructure, land use, historical illegal discharges, dumping, or cross connections? ( <i>Part I.E.3.c.(2)(a)</i> )	X		
24.	Does the permittee screen all outfalls annually, or a minimum of 50 outfalls annually if the total number of MS4 outfalls is greater than fifty? ( <i>Part I.E.3.c.(2)(b)</i> )	X		
25.	If the MS4 has more than 50 outfalls, does the permittee's schedule to screen a minimum of 50 outfalls ensure that no more than 50% are screened in the previous 12-month period? ( <i>Part I.E.3.c.(2)(c)</i> )	X		
26.	If the permittee has adopted a risk-based approach to dry weather screening, does the risk-based approach conform to the standards established in Part I.E.3.c.(2) (d) through (f)?	X		
27.	Do dry weather screening protocols contain measures to track the unique outfall identifiers or observation point, time and quantity of the last rainfall event, and site descriptions (e.g., conveyance type and land uses)? ( <i>Part I.E.3.c.(2)(g)</i> )	X		
28.	Do dry weather screening protocols contain measures to track observed indicators of possible illicit discharge events (e.g., floatables, deposits, stains, and dying/dead or overgrown vegetation)? ( <i>Part I.E.3.c.(2)(g)</i> )	X		
29.	Do dry weather screening protocols contain measures to track whether or not a discharge was observed, and if a discharge was observed, the estimated discharge rate, visual characteristics of that discharge (e.g., odor, color, clarity, etc.) and the physical condition of the outfall? ( <i>Part I.E.3.c.(2)(g)</i> )	X		
30.	If the permittee has adopted a risk-based approach to dry weather screening, do the dry weather screening protocols contain measures to track the location of the observation point, downstream outfall unique identifier and risk factors or rationale for establishing the observation point? ( <i>Part I.E.3.c.(2)(g)(viii)</i> )	X		



<b><u>Illicit Discharge Detection and Elimination (MCM 3)</u></b>		<input type="checkbox"/> N/A – Section Not Evaluated		
<b>Questions</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
31. Do IDDE written procedures include a timeframe upon which to conduct an investigation to identify and located the source of observed nonstormwater discharges? ( <i>Part I.E.3.c.(3)</i> )		X		
32. Does the above-referenced timeframe include priority of discharges to sanitary sewage and those believed to be a risk to human health and public safety? ( <i>Part I.E.3.c.(3)</i> )		X		
33. Do dry weather screening protocols have methodologies to determine the source of all illicit discharges (including a timeframe upon which to conduct investigations) and for conducting follow-up investigations? ( <i>Part I.E.3.c.(4)</i> )		X		
34. Does the permittee track all illicit discharge investigations, and document the date(s) the discharge was observed, results of the investigations (including the sources, if identified), any follow-ups, resolutions, and date investigations were closed? ( <i>Part I.E.3.c.(6)</i> )		X		
35. Does the MS4 program plan include the MS4 map and outfall information table (or included by reference), copies of any written notifications of physical interconnections given by the permittee to other MS4s and the IDDE procedures required by Part I.E.3.c? ( <i>Part I.E.3.d</i> )		X		

**Audit Notes and Comments-Illicit Discharge Detection and Elimination (MCM 3):**

Q1-Q6: The MS4 system map was included in the FY2024 Annual Report and Program Plan. The map shows the regulated service area, public and private stormwater management facilities, outfalls, point of discharges, and receiving waters (including the name of the receiving water). The map was provided in a PDF format; please note that the permittee will be required to develop and submit a geodatabase or shapefile of the MS4 map within 24 months of the permit effective date, as required by Part I.E.3.a.(3).

Q11, 13, 14: The information table denoted if the received water was listed as impaired, however, it did not specify that the assessment was based on the 2022 version of the Virginia 305(b)/303(d) Water Quality Assessment Integrated Report. Outfall 000121IO was missing the receiving water, impairment, and TMDL data. The outfall information table was revised to include the 2022 date of the integrated report and completed the information for the abovementioned Outfall. The revisions were submitted to DEQ on May 8, 2025. No further action is required, and the items are deemed complete. The outfall information table contains the outfall ID, latitude and longitude of the outfalls, drainage areas, receiving waters, impairment, 6th Order HUC, and applicable TMDLs.

Q15: The permittee has not submitted a format file geodatabase or two shapefiles of the MS4 map to DEQ that includes all items described in Part I.E.3.a(3) and submitted according to the data format standards outlined in Part I.E.3.a(4). The format file geodatabase or two shapefiles are not due until the November 1, 2025, deadline.

Q17: The program plan documented four interconnections with Arlington County, Virginia Department of Transportation, Fairfax County, and George Washington Memorial Parkway in letters dated July 15, 2009, and May 24, 2018 (GWMP only). The City of Arlington provided an updated correspondence with the four interconnections on July 30, 2020. The original letter and recent email correspondences are included in Appendix C of the program plan.

Q18-Q24, Q28-Q29, Q31-Q33: The permittee developed and implemented a comprehensive Illicit Discharge Detection & Elimination Program Policies and Procedures document (hereon referred to as the "IDDE Program Manual"), last revised April 12, 2024. The IDDE Program Manual is very detailed and covers the following elements (1) legal authority, (2) dry weather field screening, (3) illicit discharge investigations, and (4) enforcement for illicit discharges. The dry weather screening records were reviewed over the FY2024 and FY2025 annual reporting periods and all forms were found to be completed consistently, fully and with descriptive narratives.

Q27: The permittee's Outfall Inspection Forms used in FY2024 and FY2025 include the time since the last precipitation event and the quantity of the last precipitation event. These forms also have appropriate fields for documenting the rate of flow if any is observed.

Overall: DEQ and City staff walked through the dry weather screening form and observed Outfall 000147IO. This inspection was thorough and demonstrated adherence to the dry weather screening procedures. (Photos 7 – 8)

**Items of Non-Compliance identified in the questions above:**

N/A

<b><u>Construction Site Stormwater Runoff Control (MCM 4)</u></b>		<input type="checkbox"/> N/A – Section Not Evaluated		
<b>Questions</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
1.	Does the permittee utilize its legal authority (e.g., ordinances, permits, orders, contract language, interjurisdictional agreements, etc.) to address discharges into the MS4 from regulated construction site stormwater runoff? ( <i>Part I.E.4.a</i> )	X		
2.	<p>If the traditional permittee:</p> <p>(1) Is a city, county, or town that <b>has</b> adopted a Virginia Erosion and Sediment Control Program (VESCP), does the permittee control construction site stormwater runoff by implementing a VESCP consistent with the Virginia Erosion and Sediment Control Law (VESCL) and Regulations? (<i>Part I.E.4.a (1)</i>)</p> <p>OR</p> <p>(2) Is a town that <b>has not</b> adopted a VESCP, does the permittee rely on the surrounding county's VESCP and appropriately notify the county of erosion, sedimentation or other construction runoff problems? (<i>Part I.E.4.a.(2)</i>)</p>	X		

<b>Construction Site Stormwater Runoff Control (MCM 4)</b>		<input type="checkbox"/> N/A – Section Not Evaluated		
<b>Questions</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
<p>3. If the nontraditional permittee:</p> <p>(1) Is a state agency, public institution of higher education (including community colleges, colleges, and universities), or a federal entity that <b>has</b> developed standards and specifications in accordance with the VESCL and Regulations, does the permittee implement the most recent department approved standards and specifications? (<i>Part I.E.4.a.(3)</i>)</p> <p>OR</p> <p>(2) Is a state agency, public institution of higher education (including community colleges, colleges and universities), or a federal entity that <b>has not</b> developed standards and specifications, OR is a school board or other local government body, does the permittee inspect land disturbing projects 10,000 square feet or greater in size (or 2,500 square feet or greater in areas designated under the Chesapeake Bay Preservation Act) with the frequencies established in Part I.E.4.a.(4) or (5)?</p>				X
<p>4. For MS4s for which Question 3 above applies, does the permittee inspect applicable land disturbing activities (a) during or immediately following initial installation of erosion and sediment controls, (b) at least once every two-week period, (c) within 48 hours following any runoff producing storm event, and (d) at the completion of the project prior to the release of any performance bond? (<i>Part I.E.4.a.(4)</i>)</p>				X
<p>5. Does the permittee require the use of controls to prevent nonstormwater discharges (e.g., concrete washout, fuels, oils, wastewater) from construction sites? (<i>Part I.E.4.b</i>)</p>		X		
<p>6. Does the permittee ensure that employees and contractors serving as plan reviewers, inspectors, program administrators and construction site operators obtain and maintain the appropriate certifications required under the VESCL and Regulations? (<i>Part I.E.4.c</i>)</p>		X		
<p>7. For traditional permittees described in Question 2 above, does the permittee's <b>MS4 program plan</b> include the local ordinance citations for the VESCP program? (<i>Part I.E.4.d.(1) and (2)</i>)</p>		X		
<p>8. For nontraditional permittees described in Question 3 above that have standards and specifications, does the permittee's MS4 program plan include the most recently approved standards and specifications (or the location, if incorporated by reference) and a copy of the most recent standards and specifications approval letter from DEQ? (<i>Part I.E.4.d.(3)</i>)</p>				X
<p>9. Does the permittee's MS4 program plan include a description of the legal authorities utilized to ensure compliance with Part I.E.4.a (such as ordinances, permits, orders, contract language, agreements, etc.)? (<i>Part I.E.4.d.(4)</i>)</p>		X		
<p>10. For traditional permittees described in Question 2 above, does the permittee's MS4 program plan include written inspection procedures and written procedures for requiring VESCP compliance through corrective action or enforcement action, as specified in Part I.E.4.d.(5) and (7)?</p>		X		
<p>11. For nontraditional permittees described in Question 3 above, does the permittee's MS4 program plan include written inspection procedures and written procedures for requiring compliance through corrective actions or enforcement actions, as specified in Part I.E.4.d.(6) and (8)?</p>				X
<p>12. Does the permittee's MS4 program plan include the roles and responsibilities of each of the permittee's departments, divisions or subdivisions implementing erosion and sediment control and construction site stormwater runoff control requirements? (<i>Part I.E.4.d.(9)</i>)</p>		X		

**Audit Notes and Comments: Construction Site Stormwater Runoff Control (MCM 4):**

Q2: The City of Alexandria has adopted a Virginia Erosion and Sediment Control Program. Chapter 4 of Title 5 of the Code of the City of Alexandria, the “Erosion and Sediment Control” ordinance, implements requirements of the Virginia Erosion and Sediment Control Law (VESCL) and attendant regulations.

Q3, Q4, Q8, Q11: The permittee is a traditional permittee, as defined in 9VAC25-890-1, therefore these questions do not apply.

Overall: DEQ and City of Alexandria staff conducted a site visit to Alexandria Housing Development [AHDC Seminary Road project (VAR10R749)] and West End Infrastructure [Landmark Mall project (VAR10R021)]. See attached Attachment A for the Construction General Permit Site Inspection Report Level 1 and the inspection response.

**Items of Non-Compliance identified in the questions above:**

N/A

<b>Post-Construction Stormwater Management (MCM 5)</b>		<input type="checkbox"/> N/A – Section Not Evaluated		
<b>Questions</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
<p>1. If the traditional permittee is:</p> <p>(1) A city, county or town with an approved Virginia Stormwater Management Program (VSMP), does the permittee implement the VSMP consistent with the Virginia Stormwater Management Act and VSMP Regulations, in addition to maintaining an inspection and maintenance program in accordance with Part I.E.5.b and c? (<i>Part I.E.5.a (1)</i>)</p> <p>OR</p> <p>(2) A town that has not adopted a VSMP, but the surrounding county implements the VSMP, does the town notify the surrounding county of erosion, sedimentation or other post-construction stormwater runoff problems and maintain an inspection and maintenance program in accordance with Part I.E.5.c and d? (<i>Part I.E.5.a.(2)</i>)</p>		X		
<p>2. If the nontraditional permittee is:</p> <p>(1) A state agency, public institution of higher education (community college, colleges and universities) or a federal entity that has developed standards and specifications in accordance with the Virginia Stormwater Management Act and VSMP Regulations, does the permittee implement the most recent DEQ-approved standards and specifications and maintain an inspection and maintenance program in accordance with Part I.E.5.b? (<i>Part I.E.5.a.(4)</i>)</p> <p>OR</p> <p>(2) A state agency, public institution of higher education or a federal entity that has not developed standards and specifications in accordance with the Virginia Stormwater Management Act and the VSMP Regulations, does the permittee implement a post-construction stormwater runoff control program through compliance with the VSMP Regulations with implementation of a maintenance and inspection program consistent with Part I.E.5.b? (<i>Part I.E.5.a.(5)</i>)</p> <p>OR</p> <p>(3) A school board or other local government body, does the permittee implement a post-construction stormwater runoff control program through compliance with the VSMP Regulations or in accordance with more stringent local requirements (if applicable) with implementation of a maintenance and inspection program consistent with Part I.E.5.b? (<i>Part I.E.5.a.(6)</i>)</p>				X
3. Has the permittee developed, updated and/or maintained written inspection and maintenance procedures in order to ensure adequate long-term operation and maintenance of permittee-owned stormwater management facilities (SMFs)? ( <i>Part I.E.5.b.(1)</i> )		X		
4. Does the permittee inspect permittee-owned or operated SMFs no less than once per year? ( <i>Part I.E.5.b.(3)</i> )		X		
5. Does the permittee utilize an alternative inspection schedule that is appropriately documented and implemented in accordance with Part I.E.5.b.(3)?				X
6. If during the inspection of permittee-owned or operated SMFs, the permittee determines that maintenance is required, does the permittee conduct maintenance in accordance with the written inspection and maintenance procedures? ( <i>Part I.E.5.b.(4)</i> )		X		
7. For traditional permittees described in Question 1 above, does the permittee implement an inspection and enforcement program for SMFs not owned or operated by the permittee but discharge into the permittee's MS4 that includes the minimum requirements described in Part I.E.5.c.(1) (a) and (b)?		X		
8. For traditional permittees described in Question 1 above, does the permittee ensure that privately-owned or operated SMFs are inspected at least once per five years? ( <i>Part I.E.5.c.(1) (a)</i> )		X		

<b>Post-Construction Stormwater Management (MCM 5)</b>		<input type="checkbox"/> N/A – Section Not Evaluated		
<b>Questions</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
9.	For traditional permittees described in Question 1 above, does 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 of a privately-owned or operated SMF? <i>(Part I.E.5.c.(2))</i>	X		
10.	For traditional permittees described in Question 1 above, does the permittee's MS4 program plan include a copy of the VSMP approval letter issued by DEQ? <i>(Part I.E.5.d.(1) (a))</i>	X		
11.	For traditional permittees described in Question 1 above, does the permittee's MS4 program plan include written inspection procedures (and all associated documents) utilized in the inspection of privately-owned or operated SMFs? <i>(Part I.E.5.d.(1) (b))</i>	X		
12.	For traditional permittees described in Question 1 above, does the permittee's MS4 program plan include written procedures for compliance and enforcement of inspection and maintenance requirements for privately-owned or operated SMFs? <i>(Part I.E.5.d.(1) (c))</i>	X		
13.	For nontraditional permittees described in Question 2 above, does the permittee's MS4 program plan include the most recently approved standards and specifications, or if incorporated by reference, the location where the standards and specifications and be viewed? <i>(Part I.E.5.d.(2) (a))</i>			X
14.	For nontraditional permittees described in Question 2 above, does the permittee's MS4 program plan include a copy of the most recent standards and specifications approval letter from DEQ? <i>(Part I.E.5.d.(2) (b))</i>			X
15.	Does the permittee's MS4 program plan include a description of the legal authorities utilized to ensure compliance with Part I.E.5.a, such as ordinances (including a citation where appropriate), permits, orders, specific contract language and/or interjurisdictional agreements? <i>(Part I.E.5.d.(3))</i>	X		
16.	Does the permittee's MS4 program plan include the written inspection and maintenance procedures (including other associated template documents) utilized during inspection and maintenance of SMFs owned or operated by the permittee? <i>(Part I.E.5.d.(4))</i>	X		
17.	Does the permittee's MS4 program plan include the roles and responsibilities of each of the permittee's departments, divisions, or subdivisions responsible for implementing the post-construction stormwater runoff control program? <i>(Part I.E.5.d.(5))</i>	X		
18.	Does the permittee ensure that employees and contractors implementing the stormwater program have obtained the appropriate certifications required under the Virginia Stormwater Management Act and attendant regulations? <i>(Part I.E.5.b.(2))</i>	X		
19.	For traditional permittees described in Question 1, does the permittee use the DEQ Construction Stormwater Database to report all SMFs (constructed since July 1, 2014) installed on land-disturbing projects for which a Construction General Permit (CGP) is required? <i>(Part III B.5)</i>	X		
20.	By October 1 of each year, does the permittee use the DEQ BMP Warehouse (and associated reporting template) to report all new SMFs and BMPs implemented (between July 1 and June 30 of each year) on land disturbing activities for which a CGP was not required? <i>(Part III.B.1)</i>	X		
21.	By October 1 of each year, does the permittee use the DEQ BMP Warehouse to report all SMFs and BMPs inspected between July 1 and June 30 of each year? <i>(Part III.B.4, Part III.D)</i>	X		
22.	Where applicable, has the permittee used the DEQ BMP Warehouse (and associated reporting template) to report any SMFs or BMPs that were not previously reported in accordance with Part III.B.1, 2 or 5?	X		



**Audit Notes and Comments: Post-Construction Stormwater Management for New Development and Development on Prior Developed Lands (MCM 5):**

Q2, Q13-14: The permittee is a traditional permittee, as defined in 9VAC25-890-1, therefore these questions do not apply.

Q3: The permittee developed and implemented the Policies and Procedures for Post-Construction BMP Inspection & Maintenance, last revised April 28, 2019, which thoroughly describes public stormwater BMP inspections (maintenance schedule and guidelines, inspections, and follow up), private stormwater maintenance regulations, private stormwater BMPs inspection procedures, and single-family residential BMP inspections and maintenance.

Q20-Q22: DEQ checked the BMP Warehouse to verify if the 121 public SMF inspections noted in the permittee's FY24 annual report had been reported to the BMP Warehouse. The BMP Warehouse was found to contain 52 inspection dates for public SMFs between October 6, 2023, and June 12, 2024. After the audit, on June 17<sup>th</sup>, City staff provided a letter of explanation outlining the differences in values being attributed to legacy entry errors. City staff are currently working with BMP Warehouse administrators to resolve inconsistencies. See Attachment B.

Overall: DEQ and City of Alexandria staff observed the following Stormwater Management Facilities (SMFs) at Ben Brenman stormwater management pond. During the audit rip rap at the base of one of the stormwater pond's 60" concrete culvert pipe was shifted and underlayer fabric was exposed. On May 23, 2025, City of Alexandria staff provided an update on the outfall maintenance stating that a scope of work from one of the City's BMP contractors had been received on May 16, 2025, and the completion date is expected summer of 2025. (Photos 1-6)

*Please provide photos of the maintenance conducted on the culvert pipe discharge area, once the area has been repaired.*

**Items of Non-Compliance identified in the questions above:**

N/A

<b><u>Pollution Prevention &amp; Good Housekeeping for Facilities Owned or Operated by the Permittee Within the MS4 Service Area (MCM 6)</u></b>		<input type="checkbox"/> N/A – Section Not Evaluated		
<b>Questions</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
1.	Has the permittee developed and implemented written good housekeeping procedures that address road, street, sidewalk and parking lot maintenance and cleaning at facilities owned or operated by the permittee? ( <i>Part I.E.6.b.(1)</i> )	X		
2.	If the permittee applies anti-icing or deicing agents, has the permittee updated its written procedures to include implementation of best management practices for anti-icing and deicing agent application, transport and storage? ( <i>Part I.E.6.b.(1) (a)</i> )	X		
3.	Do the written procedures ensure that the application of anti-icing and deicing agents containing urea or other forms of nitrogen and phosphorous are prohibited? ( <i>Part I.E.6.b.(1) (b)</i> )	X		
4.	Has the permittee developed and implemented written good housekeeping procedures addressing renovation and significant exterior maintenance activities (e.g., painting, roof resealing, HVAC coil cleaning, activities not covered by a VSMP CGP) at facilities owned or operated by the permittee? ( <i>Part I.E.6.b.(2)</i> )			X
5.	Do the permittee's written procedures address discharging water pumped from construction and maintenance activities not covered by another permit that covers such activities (e.g., emergency waterline repairs)? ( <i>Part I.E.6.b.(3)</i> )	X		
6.	Do the written procedures address the temporary storage of landscaping materials? ( <i>Part I.E.6.b.(4)</i> )	X		
7.	Do the written procedures address maintenance of permittee owned or operated vehicles and equipment? ( <i>Part I.E.6.b.(5)</i> )	X		
8.	Do the written procedures require application of materials (such as pesticides and herbicides) in accordance with the manufacturer's recommendations? ( <i>Part I.E.6.b.(6)</i> )	X		
9.	For permittee facilities where fertilizer is applied, do the written procedures address the appropriate application rates of fertilizer (e.g., following any nutrient management plans, or for areas not covered by nutrient management plans, following manufacturer's recommendations)? ( <i>Part I.E.6.b.(7)</i> )	X		
10.	Do the written procedures described in Questions 1 through 9 above meet the objectives described in Part I.E.6.a (e.g., preventing illicit discharges, proper disposal of wastes, wastewater, washwater, and minimizing pollutants in stormwater runoff)?	X		
11.	Does the permittee ensure that contractors employed by the permittee and engaging in activities described in Part I.E.6.b adhere to established good housekeeping procedures through use of contract language, training, written procedures, or other measures within the permittee's legal authority? ( <i>Part I.E.6.c</i> )	X		
12.	Has the permittee developed a written training plan for applicable field personnel using procedures established in accordance with Part I.E.6.a and b? ( <i>Part I.E.6.d</i> )	X		
13.	Does the permittee ensure that applicable field personnel receive training in the prevention, recognition, and elimination of illicit discharges no less than once per 24 months? ( <i>Part I.E.6.d.(1)</i> )	X		
14.	Does the permittee ensure that employees performing road, street, sidewalk and parking lot maintenance receive training in good housekeeping procedures (required by Part I.E.6.b.(1)) no less than once per 24 months? ( <i>Part I.E.6.d.(2)</i> )	X		
15.	Does the permittee ensure that employees working in and around facility maintenance, public works, or recreational facilities receive training in good housekeeping procedures (required by Part I.E.6.a and b) no less than once per 24 months? ( <i>Part I.E.6.d.(3)</i> )	X		
16.	Does the permittee ensure that employees working in and around high-priority facilities with a stormwater pollution prevention plan (SWPPP) receive training in applicable site specific SWPPP procedures no less than once per 24 months? ( <i>Part I.E.6.d (4)</i> )	X		
17.	Has the permittee ensured that employees whose duties include emergency spill control and response receive appropriate training in spill control and response? ( <i>Part I.E.6.d.(5)</i> )	X		
18.	Does the permittee ensure that employees and contractors hired by the permittee who apply pesticides and herbicides are trained and certified in accordance with the Virginia Pesticide Control Act? ( <i>Part I.E.6.d.(6)</i> )	X		

<b><u>Pollution Prevention &amp; Good Housekeeping for Facilities Owned or Operated by the Permittee Within the MS4 Service Area (MCM 6)</u></b>		<input type="checkbox"/> N/A – Section Not Evaluated		
<b>Questions</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
19.	Does the permittee maintain training records for at least three years (after training activity completion) that includes: (1) the date when applicable employees completed the training activity, (2) the number of employees who completed the training activity and (3) the training objectives and good housekeeping procedures required under Part I.E.6.a? ( <i>Part I.E.6.e</i> )	X		
20.	Has the permittee appropriately identified all high-priority facilities using the criteria in Part I.E.6.g, h and i?	X		
21.	Does the permittee maintain a list of all high-priority facilities owned or operated by the permittee not required to maintain a SWPPP? ( <i>Part I.E.6.k</i> )	X		
22.	Does the permittee annually review (by June 30 each year) any high-priority facility owned or operated by the permittee for which a SWPPP has not been developed to determine if the facility requires a SWPPP? ( <i>Part I.E.6.k</i> )	X		
23.	Do the SWPPPs include all items required by Part I.E.6.j?	X		
24.	Does the permittee ensure that SWPPPs are kept at each high-priority facility (either in hard copy or electronically, provided documents are available to all employees of the high-priority facility) and utilized as a part of employee SWPPP training required in Part I.E.6.d (4)? ( <i>Part I.E.6.m and v</i> )	X		
25.	Has the permittee reviewed 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? ( <i>Part I.E.6.l</i> )	X		
26.	Has the permittee appropriately identified lands owned or operated by the permittee where nutrients are applied to a continuous area greater than one acre that require nutrient management plans (NMPs) in accordance with Part I.E.6.p, q, r and s?	X		
27.	Does the permittee ensure that nutrient management plans are developed by a certified nutrient management planner, submitted to the Department of Conservation and Recreation, appropriately maintained and unexpired? ( <i>Part I.E.6.p, t and u</i> )	X		
28.	Does the MS4 program plan include a list of the written good housekeeping procedures required by Part I.E.6. a and b? ( <i>Part I.E.6.x.(1)</i> )	X		
29.	Does the MS4 program plan include a list of all high-priority facilities owned or operated by the permittee required to maintain a SWPPP, to include facility name, facility location and location of the SWPPP? ( <i>Part I.E.6.x.(2)</i> )	X		
30.	Does the MS4 program plan include a list of locations that turf and landscape nutrient management plans are required, to include total acreage covered by each NMP, DCR approval and expiration dates, and the location of where the NMPs are being maintained? ( <i>Part I.E.6.x.(3)</i> )	X		
31.	Does the MS4 program plan include a summary of mechanisms used by the permittee to ensure contractors implement good housekeeping and pollution prevention procedures? ( <i>Part I.E.6.x.(4)</i> )	X		
32.	Does the MS4 program plan contain the written training plan required by Part I.E.6.d? ( <i>Part I.E.6.x.(5)</i> )	X		

**Audit Notes and Comments- Pollution Prevention and Good Housekeeping for Facilities Owned or Operated by the Permittee Within the MS4 Service Area (MCM 6):**

Q1-10: The Program Plans outlines the following good housekeeping procedures: brick sidewalk maintenance; concrete sidewalk maintenance; crack sealing, strip patching, and paving/patching/concrete construction maintenance; pothole patch maintenance; bus shelter and bike rack installation and maintenance; pollution prevention measures for brine system and application; water disposal from dewatering activities during utility construction and maintenance activities; bulk material storage; disposal of landscape organic waste; fleet and vehicle maintenance; and pesticide, herbicide, and fertilizer application. The Program Plan stated that written good housekeeping procedures addressing renovation and significant exterior maintenance activities (e.g., painting, roof resealing, HVAC coil cleaning, activities not covered by a VSMP CGP) at facilities owned or operated by the permittee will be developed and implemented by November 1, 2026.

Q11, Q31: The program plan specifically references contractors working on the permittee's property and the requirements to adhere to permit requirements, the MS4 general permit regulation and contract language.

Q18: The Program Plan states that employees applying pesticides or herbicides must hold the appropriate certifications from the Virginia Department of Agricultural and Consumer Services (VDACS).

Q26, Q27, Q30: The Program Plan includes a list of locations where turf and landscape nutrient management plans (22 NMPs) are required, including the total acreage covered by each nutrient management plan (NMP), the DCR approval and expiration date for each NMP, and the location of the NMP.

Overall: During the field inspection portion of the audit, DEQ and City of Alexandria staff visited Fleet Services (3550 Wheeler Avenue) and Equipment and Materials Storage and vehicle Wash Facility (133 South Quaker). During the walkthrough of the two facilities, the City of Alexandria thoroughly inspected the site for compliance, describing the areas that are evaluated in conjunction with the identified potential pollutant sources described in the SWPPP. During the walk-through minor housekeeping issues were observed, however, the identified issues were documented and resolved in a written notice to DEQ on May 23, 2025. The written notice is included in Attachment C At 133 South Quaker, resolved items include sweeping loose debris in covered material bays, removing sediment from clogged floor drains, cleaning up minor fluid leaks from one vehicle, verifying the dumpster on the site was temporary, verifying maintenance on underground detention BMPs was performed, confirmed remaining salt residue was removed by the brine tank. No housekeeping issues were observed at 3550 Wheeler Avenue. No further action is required. (Photos 9-14 and Attachment C)

**Items of Non-Compliance identified in the questions above:**

N/A

**Recommendations:**

N/A

**Corrective Actions:**

N/A



## Stormwater Management Facility – Ben Brenman Stormwater Pond



1. Educational sign at Ben Brenman Stormwater Pond illustrating the flow of water.



2. Forebay and trash rack.



3. Trash rack at forebay inlet.



4. Floating wetland in stormwater pond.



5. Upflow filter at pond outlet structure.



6. Outlet structure showing underlayer exposed at base of the concrete culvert. Observation addressed by



permittee in Appendix B. No further action required.  
Arrow indicates the direction of flow.

**Outfall #000147I0**



7. Outfall ID 000147I0. Arrow indicates the direction of flow.



8. Downstream of outfall and Holmes Run. Arrow indicates the direction of flow.

**High priority facility – Fleet Services (3550 Wheeler Avenue)**



9. 2,000-gallon motor oil and hydraulic oil tank.



10. Metals dumpster with cover.

**High priority facility - Equipment and Materials Storage and Vehicle Wash Facility (133 S. Quaker)**



**11. Tracking of soil from material storage areas. After the audit, the area was cleaned and the observation addressed by permittee in Appendix B.**



**12. Salt equipment storage.**



**13. Salt storage building.**



**14. Liquid deicer tanks.**



**Archived:** Thursday, July 17, 2025 12:09:28 PM

**From:** [REDACTED]

**Sent:** Wednesday, May 14, 2025 3:55:12 PM

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** City of Alexandria | Corrective Actions for Alexandria Housing Development & West End Infrastructure

**Sensitivity:** Normal

**Attachments:**

[Alexandria Corrective Actions\\_05142025.pdf](#); [Alexandria Housing Development\\_\\_DEQ\\_CGP\\_ReInspection\\_May 1 2025\\_Packet\\_Signed.pdf](#); [West End Project\\_\\_DEQ\\_CGP\\_ReInspection\\_May 1 2025\\_Packet\\_Signed.pdf](#);

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**CAUTION:** This Email originated from OUTSIDE of the COV. Do not open attachments or click links unless this email comes from a known sender and you know the content is safe..

Dear Mr. [REDACTED],

Pursuant to your email dated May 5, 2025, the City of Alexandria, as the local VESMP authority, has worked with the developers for both the Alexandria Housing Development [AHDC Seminary Road project (VAR10R749)] & West End Infrastructure [Landmark Mall project (VAR10R021)], to ensure observations made by DEQ during the May 1, 2025, MS4 Audit, have been corrected.

Attached, please find the Construction General Permit Inspection Reports for these two locations and resolution for corrective actions.

If you have any questions or need any further information, please let us know.

Sincerely,

[REDACTED]

[REDACTED], MNR, ENV SP

Senior Environmental Specialist / CE III

City of Alexandria, Virginia

Transportation & Environmental Services

Office Phone Number (703.746.4127)

Cell Phone Number (703.915.5695)

[alexandriava.gov](http://alexandriava.gov)



Transportation and Environmental Services  
Stormwater Management Division  
1800 Limerick Drive, Suite 500  
Alexandria, VA 22314

www.alexandriava.gov

Phone: 703-746-6499

May 14, 2025

To: [REDACTED]  
Stormwater Compliance Specialist  
Northern Regional Office  
Virginia Department of Environmental Quality (DEQ)  
13901 Crown Court  
Woodbridge, VA 22193  
Electronically: michael.weitekamp@deq.virginia.gov

RE: Corrective Actions for Alexandria Housing Development & West End Infrastructure

Dear Mr. [REDACTED] p,

Pursuant to your email dated May 5, 2025, the City of Alexandria, as the local VESMP authority, has worked with the developers for both the Alexandria Housing Development [AHDC Seminary Road project (VAR10R749)] & West End Infrastructure [Landmark Mall project (VAR10R021)], to ensure observations made by DEQ during the May 1, 2025, MS4 Audit, have been corrected.

Attached, please find the Construction General Permit Inspection Reports for these two locations and resolution for corrective actions.

Sincerely,



[REDACTED], MNR, ENV SP  
Senior Environmental Specialist / CE III  
Transportation & Environmental Services  
Office Phone Number (703.746.4127) | Cell Phone Number (703.915.5695)

CC: [REDACTED], VDEQ, NRO Regional MS4 Coordinator/Inspector

Attachments:

Alexandria Housing Development CGP Inspection Report, 5/12/2024, with Corrective Actions Addressed  
West End Infrastructure CGP Inspection Report, 5/12/2024 with Corrective Actions Addressed



Transportation and Environmental Services  
Stormwater Management Division  
1800 Limerick Drive, Suite 500  
Alexandria, VA 22314

www.alexandriava.gov

Phone: 703-746-6499

June 17, 2025

To: [REDACTED]  
Virginia Department of Environmental Quality  
NRO Regional MS4 Coordinator/Inspector  
13901 Crown Court  
Woodbridge, VA 22193  
Electronically: amy.hagerdon@deq.virginia.gov

RE: BMP Warehouse Entries Email Received June 10, 2025

Dear Ms. [REDACTED],

Thank you for your feedback on the City's BMP Warehouse entries as it relates to the City's FY24 Annual Report with respect to the MS4 Audit. This letter provides clarification for the differences you raised for the number of BMP shown in the warehouse and the number of BMPs found in the FY24 report, and the missing inspection dates.

Table 1 provides an overview of discrepancy in the number of BMPs reported in the FY24 Annual Report and the BMP Warehouse. The discussion below provides further details into the discrepancy.

Table 1. Summary of BMPs

# BMPs	Notes
121	Total number of public BMPs indicated in MS4 Annual Report
82	Total number of public BMP data entries in BMP Warehouse
52	<i>Number of public BMPs in BMP Warehouse with inspection dates</i>
30	<i>Number of public BMPs in BMP Warehouse without inspection dates</i>
39	Discrepancy in reported number and entries in BMP Warehouse (121 – 82)

### **Discrepancy Between BMP Warehouse and Annual MS4 Report (39 BMPs)**

The difference between the 121 reported public BMPs in the FY24 Annual Report and the 82 with inspection dates in the BMP Warehouse leaves 39 BMPs unaccounted for in the Warehouse. These 39 BMPs are not clearly linked to entries in the BMP Warehouse appear to be legacy entries lacking Data Provider IDs and Lat/Long coordinates, which prevents association with Warehouse Tracking IDs. Because of this, these BMPs could not be queried to include an inspection date.

These "nameless" BMPs likely exist within the system due to upload errors accumulated over more than a decade of submissions. City staff are actively coordinating with VDEQ's Water Planning Division to

## City of Alexandria MS4 Program

facilitate a comprehensive re-upload. This will resolve historical inconsistencies and ensure accurate future inspection uploads.

Staff was informed that once VDEQ finalizes its internal preparations, the re-upload will proceed and allow inspection records in the BMP Warehouse to reflect full compliance with BMP tracking requirements under the MS4 permit as maintained with the City's internal tracking systems.

### **Number of Public BMPs in the BMP Warehouse without Inspection Dates (30)**

As noted Table 1, there are 30 BMPs in the BMP Warehouse that are linked, however there is no inspection date associated with the BMPs. Please see the list of "Individual BMP Certifications" and "Ecosystem Restoration BMPs" sections below for clarification on why the inspection date does not exist in the BMP Warehouse.

#### **Individual BMP Clarifications (27 BMPs)**

- **2018-0006 01 – 012 Public Storage ROW Bioretention (12 BMPs)**  
Certified and reported in FY24. Performance bond not yet released due to incomplete as-built documentation. Public inspections will begin once the bond is released. Maintenance currently remains with the developer.
- **2020-0015 01 – 02 801 N Fairfax St Green Roof and CDS Treatment System (2 BMPs)**  
Erroneously marked as "public" in the Warehouse upload. Bond was released in FY24. BMP is now inspected per MS4 requirements for privately owned facilities.
- **2020-0001 02 – 09 1200 N Henry St ROW Bioretention (8 BMPs)**  
Certified and reported online in FY24; bond released in FY25. Now subject to inspection as a publicly owned BMP.
- **2015-0025 Mt Jefferson Park Permeable Pavement (1 BMP)**  
Certified in FY23, reported online in FY24; bond released in FY25. Now subject to inspection as a publicly owned BMP.
- **2016-0024 02 – 04 ROW Bioretention (3 BMPs)**  
Certified and reported as public in FY21 but erroneously tracked as private in the legacy City BMP database. This error was discovered during a 2025 inspection of a related green roof. Maintenance responsibility has since been transferred to the City via MOU, and the BMP is now inspected as public.
- **2008-0005 Potomac Yard Dog Park Bioretention (1 BMP)**  
Inadvertently omitted from prior Warehouse uploads. Inspected on 11/14/2023 and maintained on 05/01/2025. Will be reflected in future Warehouse inspection reports.

#### **Ecosystem Restoration BMPs (Unintentional Omissions in Warehouse) (3 BMPs)**

The following BMPs were inadvertently omitted from previous BMP Warehouse inspection uploads. These omissions were not intentional and were identified during internal QA/QC review. These facilities will be included in the 'fresh upload' to the Warehouse when performed. Each facility has since been inspected and confirmed to be functioning as designed and will be included in the next annual report:

- **2003-0027 01R Lake Cook Retrofit Wet Pond** – Inspected 06/28/2024
- **2018-0101 01 DPI Windmill Hill Living Shoreline** – Inspected 06/28/2024
- **2016-0103 01 DPI Four Mile Run Wetlands** – Inspected 06/30/2024




### **City of Alexandria MS4 Program**

These will be included in the future BMP Warehouse upload to ensure full compliance with MS4 tracking requirements.

In addition to above clarifications, the FY24 Public BMP Inspections spreadsheet is attached that confirms the City's compliance with the requirements of the MS4 Phase II Permit to inspect and report on public BMPs annually. Please contact me if you have any questions or need more information.

Sincerely,

A black rectangular redaction box covering a handwritten signature.

, MNR, ENV SP  
Senior Environmental Specialist / Civil Engineer III

**Attachment:**

**FY24 Public BMP Inspections**



Transportation and Environmental Services  
Stormwater Management Division  
1800 Limerick Drive, Suite 500  
Alexandria, VA 22314

[www.alexandriava.gov](http://www.alexandriava.gov)

Phone: 703-746-6499

May 23, 2025

To: [REDACTED]  
Virginia Department of Environmental Quality  
NRO Regional MS4 Coordinator/Inspector  
13901 Crown Court  
Woodbridge, VA 22193  
Electronically: [amy.hagerdon@deq.virginia.gov](mailto:amy.hagerdon@deq.virginia.gov)

RE: Follow Up to On-Site MS4 Audit, May 1, 2025

Dear Ms. [REDACTED],

Thank you for visiting the City of Alexandria on May 1, 2025, to perform the onsite portion of the audit of our Municipal Separate Storm Sewer System (MS4) Permit Program. During the onsite portion of the audit, City Staff accompanied Virginia Department of Environmental Quality (VDEQ) staff that conducted inspections pursuant to MS4 Permit Minimum Control Measure (MCM) #4 at two active construction sites: Alexandria Housing Development [AHDC Seminary Road project (VAR10R749)] and West End Infrastructure [Landmark Mall project (VAR10R021)]. VDEQ staff provided two inspection reports on May 5, 2025, which noted corrective actions that needed to be addressed by May 12, with documentation of the corrective actions being addressed by May 19. City Staff responded with documentation on May 14, 2025, that corrective actions were confirmed to have been adequately addressed by May 12, 2025.

City and VDEQ staff also did a walkthrough of the Ben Brenman stormwater management pond and its associated outfall under MCM#5, an outfall close to the park under MCM#3, and two high-priority facilities – Fleet Services and 133 S. Quaker – under MCM#6. This letter provides observations made during the walk throughs and the proactive measure(s), or “resolution” taken to address these observations in advance of your audit report anticipated to be received later.

***Ben Brenman Outfall***

Observation: Rip rap and fabric destabilization

Resolution: On May 16, 2025, the City received a scope of work from one of our BMP contractors to fix the observed issues with the outfall. The completion date for this work is anticipated this summer. Staff can provide follow up after the work is done if requested.

**City of Alexandria MS4 Audit Field Visit Follow Up  
May 2025**

***133 S. Quaker***

Observation: Asphalt and loose debris were observed adjacent to the material bays and required removal.

Resolution: Asphalt was removed successfully, and the bay entrances were swept of loose debris (see Figures 1 and 2).



*Figure 1. Image of area cleared of standing debris; photo taken 5/16/2025.*



*Figure 2. Bays have been swept of loose debris; photo taken 5/16/2025.*

**City of Alexandria MS4 Audit Field Visit Follow Up  
May 2025**

Observation: Floor drains appeared clogged with sediment both on the north and the south side of the property.

Resolution: Area grate drains were vacuumed out 5/16/2025 using a VacTruck (see Figure 3)



*Figure 3. Close up images of grate drain in south (left) and north (right) sides of the site during wet weather event, 5/22/2025.*

Observation: Confirm roll off is temporary in nature (not permanent).

Resolution: T&ES Resource Recovery confirmed the roll off is temporarily stored at 133 S. Quaker. In the event, the roll off becomes permanent, cover will be required and the SWPPP will be updated.

Observation: Fresh vehicle fluid found on the pavement under a parked trash truck.

Resolution: T&ES Resource Recovery staff were contacted immediately and informed of the fluid leak and reminded to utilize good housekeeping practices to clean pavement (dry clean-up methods). Staff indicated that the leak had been contained and cleaned up that day. Further, the T&ES Resource Recovery Supervisor indicated they would continue to emphasize completing pre- and post-trip vehicle inspections, deploy drip pans, as needed, and to utilize dry clean-up methods and proper disposal, during weekly muster meetings.

Observation: Ensure both stormwater BMPs at facility are maintained and are in proper working condition.

Resolution: The City performed the annual inspection of the BMPs on January 27, 2025, and maintenance was performed on April 28.

Observation: Confirm that remaining salt is removed from structures at the facility in the area of the brine tanks.

Resolution: T&ES Public Works Services confirmed that the de-winterization took place in May. Staff observed all remaining salt by the brine tank was removed (see Figure 4).



*Figure 4. Area cleared of salt residue; photo taken 5/16/2025.*

**City of Alexandria MS4 Audit Field Visit Follow Up**  
**May 2025**

The City shares VDEQ's commitment to managing the City's assets to protect water quality and we look forward to working with you to further improve our MS4 program. Please contact [REDACTED] Stormwater Management Division Chief, at [REDACTED] or 703-746-4643, or myself with any questions or concerns.

Sincerely,

  
[REDACTED]

[REDACTED], MNR, ENV SP  
Senior Environmental Specialist / Civil Engineer III