

LOUDOUN COUNTY SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) STORMWATER MANAGEMENT PROGRAM PLAN

For July 2018 – June 2023



Loudoun County
Department of General Services
PO Box 7100
801 Sycolin Road, S.E.
Suite 300
Leesburg, VA 20175

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Introduction / Overview

The following document represents Loudoun County's (County) Stormwater Management Program to comply with the Virginia General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (MS4 General Permit). This MS4 Program enables the County to meet the following goals:

- Reduce the discharge of pollutants to the "maximum extent practicable" (MEP)
- Protect water quality
- Satisfy the appropriate water quality requirements of the State Water Control Law

The MS4 Program Plan addresses Parts I, II, and III of the MS4 General Permit.

To arrive at appropriate and cost-effective best management practices (BMPs), the County reviewed existing stormwater management operations, ordinances, and programming as they relate to the compliance requirements of the MS4 General Permit. Further, in consideration of Virginia's MEP threshold, the County examined each proposed BMP to determine whether the County had the legal, technical, administrative, and financial ability to ensure effective implementation. The County's financial considerations included potential budget implications for each proposed BMP, such as the resources required and any existing synergies between tasks. Based on those findings and current budget allocations, the County can support the Program through appropriations from the General Fund and the Capital Improvement Program.

For each selected BMP, the County has identified:

1. Roles and responsibilities
2. A description of the BMP or strategy
3. Applicable standard operation procedures
4. Measurable goals
5. The appropriate County department responsible
6. Applicable documents by reference

Existing Program

The County manages stormwater through a comprehensive local program featuring the following primary functions:

1. Design review and inspection of new construction
 - a. Ensures quality and quantity control of increased stormwater is adequately addressed
2. Erosion and sediment control/management on open construction sites
3. Virginian Stormwater Management Program (VSMP) Authority
4. Inspection, repair, and maintenance of existing stormwater facilities
5. Management of the MS4 Permit

The program is administered by two departments: Building and Development (B&D) and Department of General Services (DGS) with support from Fire and Rescue (Table 1). B&D performs design review/inspection of new construction and also manages the Erosion and Sedimentation Control (E&S) Program. Since July 1, 2014, Loudoun County has been established as a VSMP Authority, and the VSMP Administrator is functionally located within B&D. DGS provides for inspection, repair, and maintenance of existing stormwater facilities and also



manages the MS4 General Permit.

Stormwater Management is governed by a series of ordinances and documents referenced throughout this MS4 Program Plan (Appendix A) which guide the planning, development, implementation, maintenance, and enforcement of stormwater management practices and facilities within the County.

This program plan is divided into two Parts, which follow the corresponding Parts outlined in the MS4 General Permit. Each BMP described herein has noted the corresponding permit section for ease of cross-referencing.

Table 1: Loudoun County MS4 General Permit Program Areas

County Department	MS4 Roles and Responsibilities
Department of General Services (DGS)	Ensuring compliance with DEQ MS4 General Permit Development of and updates to the MS4 Program Plan Development of the MS4 Annual Reports Compliance with MCM 1 of the MS4 GP Compliance with MCM 2 of the MS4 GP Compliance with MCM 3 of the MS4 GP (see Fire and Rescue below) Compliance with MCM 5 of the MS4 GP (see B&D below) Compliance with MCM 6 of the MS4 GP Compliance with MS4 GP Part II – TMDL Special Conditions, Chesapeake Bay TMDL Compliance with MS4 GP Part II – TMDL Special Conditions, Local TMDL
Department of Building and Development (B&D)	Compliance with MCM 4 of the MS4 GP Compliance with MCM 5 of the MS4 GP (VSMP Authority)
Fire and Rescue Department	Compliance with MCM 3 of the MS4 GP. Fire and Rescue is responsible for emergency response and reporting related to discharges to the stormwater system that occur as a result of traffic accidents or hazardous materials response.



Part I: Discharge Authorization and Special Conditions

Part I of the MS4 General Permit requires the MS4 operator to develop an MS4 Program Plan (Part 1 C), develop and submit an Annual MS4 Report (Part 1 D), and comply with the 6 Minimum Control Measures (Part 1 E). These sections of the MS4 Program Plan outline how Loudoun County will comply with each of these permit requirements.

BMP A: Develop an MS4 Program Plan

Permit Section: Part I C 1

Objective: Develop and implement a MS4 Program Plan that includes the parameters specified in Part I C 1.

Measurable Goal: Development of the MS4 Program Plan.

Necessary Documents: MS4 General Permit.

Responsible Party: Department of General Services (DGS). DGS shall be responsible for drafting and updating the MS4 Program Plan.

Schedule: May 1, 2019. The revised MS4 Program Plan shall be completed no later than six months after the effective date of the permit (6 months from November 1, 2018).

May 30, 2019. Due date to post the revised MS4 Program Plan to the Stormwater website.

Items to Report: Completed Program Plan.

BMP B: MS4 Program Plan Development Schedule

Permit Section: Part I C 3

Objective: Loudoun County was previously covered under the General VPDES Permit that was effective July 1, 2013. Therefore, Loudoun County is required under this section to develop a revised MS4 Program Plan no later than six months after the effective date of the current MS4 permit, which is May 1, 2019. In addition, within 30 days of completing the MS4 Program Plan, the plan shall be posted to the website.

Measurable Goal: Development of revised MS4 Program Plan.

Necessary Documents: MS4 General Permit (Appendix A).

Responsible Party: Department of General Services (Table 1).



Schedule: May 1, 2019. The revised MS4 Program Plan shall be completed no later than six months after the effective date of the permit, which is November 1, 2018.

May 30, 2019. Due date to post the revised MS4 Program Plan to the Stormwater website.

Items to Report: Dates of plan completion and posting to the website.

BMP C: Revisions to the MS4 Program Plan

Permit Section: Part I C 4

Objective: Review the effectiveness of the MS4 Program Plan. The MS4 Program Plan shall be reviewed annually to ensure that all of the BMPs are still achieving their intended goals. All program plan changes will be summarized in the annual report and the MS4 Program Plan amended as needed.

Measurable Goal: Annual review of the MS4 Program Plan.

Necessary Documents: MS4 Program Plan.

MS4 Annual Report.

Responsible Party: Department of General Services (Table 1).

Schedule: Each year, the MS4 Program Plan will be reviewed and all updates shall be summarized in the annual report.

Items to Report: Updates to the MS4 Program Plan shall be summarized in the annual report.

Method of Evaluation: Review of the MS4 Program Plan.

BMP D: Develop and Submit an Annual Report to DEQ

Permit Section: Part I D 1 and 2, 3, and 4

Objective: Develop an MS4 Annual Report that summarizes permit compliance for the permit period; July 1 through June 30. The MS4 annual report will be submitted to DEQ by October 1 of each permit year.

Measurable Goal: Annual report is completed and submitted to DEQ annually no later than October 1 of each year.

Necessary Documents: MS4 General Permit (Appendix A).



MS4 Program Plan.

<u>Responsible Party:</u>	Department of General Services (Table 1). DGS shall be responsible for drafting and submitting the MS4 Annual Report to DEQ.
<u>Schedule:</u>	MS4 Annual report will be submitted to DEQ on or before October 1 of each year each permit year.
<u>Items to Report:</u>	Report items outlined in Part I D 2.
<u>Method of Evaluation:</u>	Completion of the MS4 Annual Report.

BMP E: Evaluate Effectiveness of Program BMPs

<u>Permit Section:</u>	Part I D 2 e
<u>Objective:</u>	Ensure that, to the MEP, all program BMPs are achieving the objectives intended; to correct identified deficiencies and/or inefficiencies.
<u>Measurable Goal:</u>	Each program BMP will be evaluated/critiqued annually to determine its effectiveness in achieving its stated objective, with recommendations for continuance or revision provided.
<u>Necessary Documents:</u>	MS4 Program Plan.
<u>Responsible Party:</u>	Department of General Services (Table 1).
<u>Schedule:</u>	The first evaluation shall be conducted during Permit Year 2 with future implementation through the end of the permit cycle.
<u>Items to Report:</u>	The MS4 Annual Report will include when the evaluation was completed. It will also include a summary of any changes.

BMP F: Status Report on the Implementation of the Chesapeake Bay TMDL Action Plan

<u>Permit Section:</u>	Part I D 4
<u>Objective:</u>	The MS4 Annual Report shall include a status report on the implementation of the Chesapeake Bay TMDL Action Plan in accordance with Part II A of this permit including any revisions to the plan.
<u>Measurable Goal:</u>	Annual reporting on the status of the Chesapeake Bay TMDL Action Plan.
<u>Necessary Documents:</u>	Loudoun County Chesapeake Bay TMDL Action Plan (Appendix A).



Loudoun County Chesapeake Bay TMDL Action Plan, Phase II (Appendix A).

Responsible Party: Department of General Services (Table 1).
Schedule: Provide in each annual report.
Items to Report: Status on meeting the Chesapeake Bay reduction goals.

BMP G: Status Report on the Implementation of the Local TMDL Action Plans

Permit Section: Part I, D 5

Objective: The MS4 Annual Report shall include a status report on the implementation of the local TMDL action plans in accordance with Part II B including any revisions to the plan.

Measurable Goal: Annual reporting on the status of the local TMDL Action Plans.

Necessary Documents: Loudoun County Local TMDL Action Plans (Appendix A).

Responsible Party: Department of General Services (Table 1).

Schedule: Provide in each annual report.

Items to Report: Status on meeting the local TMDL reduction goals.



MCM 1: Public Education and Outreach BMPs

BMP 1A: Revise the Public Education and Outreach Program

Permit Section: Part I E 1 a

Objective: The permittee shall implement a Public Education and Outreach Program (PEOP) designed to:

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

The PEOP (Appendix A) developed under the previous permit, dated May 2016, shall be updated to meet the current permit requirements.

Measurable Goal: Development of a public education and outreach program that meets the current permit requirements.

Necessary Documents: Existing Public Education and Outreach Plan (Appendix A).

Responsible Party: Department of General Services (Table 1).

Schedule: Plan to be revised in Year 1 and implemented in successive years.

Items to Report: Completion of the PEOP.

Method of Evaluation: Implementation of the PEOP and annual review of the PEOP.

BMP 1B: Selection of the High-Priority Stormwater Issues

Permit Section: Part I E 1 b

Objective: As part of the development of the PEOP (BMP 1A), the County shall identify no less than three high-priority stormwater issues to meet the goal of educating the public to the MEP.

Measurable Goal: Development of at least three high-priority stormwater issues.

Necessary Documents: Public Education and Outreach Plan (Appendix A).

Responsible Party: Department of General Services (Table 1).



Schedule: Three high-priority stormwater issues developed under the previous MS4 permit will be reviewed and modified, as needed, during Year 1. The finalized high-priority stormwater issues will be implemented in successive years.

Items to Report: A list of the high-priority stormwater issues and a list of the strategies used to communicate each high-priority stormwater issue.

Method of Evaluation: Annual review of the effectiveness of each high-priority stormwater water issue.

BMP 1C: Elements to Include in the PEOP

Permit Section: Part I E 1 c

Objective: The high-priority public education and outreach program shall include the following:

1. Clearly identify the high-priority stormwater issues;
2. Explain the importance of the high-priority stormwater issues;
3. Include measures to actions the public can take to minimize the impact of the high-priority stormwater issues; and
4. Provide a contact and telephone number, website, or location where the public can find out more information.

Measurable Goal: Development of the PEOP.

Necessary Documents: Public Education and Outreach Plan (Appendix A).

Responsible Party: Department of General Services (Table 1).

Schedule: PEOP will be updated in Year 1 and implemented in successive years.

Items to Report: A list of the high-priority stormwater issues and a list of the strategies used to communicate each high-priority stormwater issue.

Method of Evaluation: Annual review of the effectiveness of each high-priority stormwater water issue.



BMP 1D: Communicate High-Priority Stormwater Issues

Permit Section: Part I E 1 d

Objective: To use two or more of the strategies listed in Table 1 of the MS4 General Permit (Figure 1) per year to communicate to the public the high-priority stormwater issues identified in accordance with Part I E 1 b including how to reduce stormwater pollution.

Measurable Goal: Development of the PEOP.

Necessary Documents: Existing Public Education and Outreach Plan.

Responsible Party: Department of General Services (Table 1).

Schedule: PEOP will be developed in Year 1 and implemented in successive years.

Items to Report: Report strategies from MS4 General Permit Table 1 utilized.

Method of Evaluation: Review of the effectiveness of each high-priority stormwater water issue.

Table 1 Strategies for Public Education and Outreach	
Strategies	Examples (provided as examples and are not meant to be all inclusive or limiting)
Traditional written materials	Informational brochures, newsletters, fact sheets, utility bill inserts, or recreational guides for targeted groups of citizens
Alternative materials	Bumper stickers, refrigerator magnets, t-shirts, or drink koozies
Signage	Temporary or permanent signage in public places or facilities, vehicle signage, bill boards, or storm drain stenciling
Media materials	Information disseminated through electronic media, radio, televisions, movie theater, or newspaper
Speaking engagements	Presentations to school, church, industry, trade, special interest, or community groups
Curriculum materials	Materials developed for school-aged children, students at local colleges or universities, or extension classes offered to local citizens
Training materials	Materials developed to disseminate during workshops offered to local citizens, trade organization, or industrial officials

Figure 1: MS4 General Permit Table 1



MCM 2: Public Involvement and Participation BMPs

BMP 2A: Public Involvement and Participation Procedures

Permit Section: Part I E 2 a

Objective: The County shall develop and implement procedures for the following:

1. Reporting mechanism for the public to report, at a minimum, the following:
 - a. Illicit discharges, improper disposal, or spills to the MS4
 - b. Complaints regarding disturbing activities
 - c. Other stormwater pollution concerns;
2. Public input on the MS4 Program Plan;
3. Receiving public input or complaints;
4. Responding to public input received on the MS4 Program Plan or complaints; and
5. Maintaining documentation of public input received on the MS4 program and associated MS4 Program Plan and the County's response.

Measurable Goal: Development of the procedures outlined above.

Necessary Documents: Applicable documents will be accessible through Stormwater website.

Responsible Party: Department of General Services (Table 1).

Schedule: Develop procedures in Year 1.
Implement the procedures in Years 2, 3, 4, and 5.

Items to Report: Completion of the procedures outlined above.

Webpage for illicit discharge, improper disposal, or spills reporting ([link](#))

Land disturbing activities complaints ([link](#))

The webpage address that contains the methods for how the public can provide input on the permittee's MS4 program ([link](#)).

Other potential stormwater pollution concerns can be reported via the Loudoun Express Request (LEx) ([link](#)).

A description of the public involvement activities to be implemented by the permittee, the anticipated time period the activities will occur, and a metric for each activity to determine if the activity is beneficial to water quality.



Method of Evaluation: Year 1: Completion of the procedures.
Years 2, 3, 4, and 5: Effectiveness of the procedures.

BMP 2B: Develop and Maintain a Stormwater Website

Permit Section: Part I E 2 b

Objective: The County shall develop and maintain a website dedicated to the MS4 Program and Stormwater Pollution Prevention.

The following information shall be posted to the webpage:

1. The effective MS4 permit and coverage letter;
2. The most current MS4 Program Plan;
3. The annual report for each year of the term covered by the permit not later than 30 days after submittal to DEQ;
4. A mechanism for the public reporting as outlined in BMP 1B above; and
5. Methods for how the public can provide input into the MS4 program plan.

Measurable Goal: Creation and maintenance of a stormwater website as outlined above.

Necessary Documents: Effective MS4 General Permit and coverage letter (Appendix A).
MS4 Program Plan.

Most recent MS4 Annual Report will be posted to the website.

Responsible Party: Department of General Services (Table 1). DGS will ensure that the website is up and running and will ensure that the required documents are posted to the website within the required timeframe.

Schedule: February 1, 2019 - Creation and implementation of the website 30 days after the effective date.

Ongoing maintenance of the website as needed.

November 1 each year. Post the MS4 Annual Report to the website 30 days after submittal to DEQ.

Items to Report: The County Stormwater website has been up and running for many years. The County will continue with the website.

Year 2, 3, 4, and 5: Post MS4 Annual Reports by November 1.

The Annual Report will include a summary of any public input on the MS4 program received, (including stormwater complaints) and how the county responded.



Method of Evaluation: Review effectiveness of the website.

BMP 2C: Public Involvement Opportunities

Permit Section: Part I E 2 c

Objective: The County shall implement four activities a year from two or more of the categories list in the general permit Table 2 (see Figure 2).

Measurable Goal: Successfully completing or supporting four (4) water quality improvement efforts.

Necessary Documents: Dependent on the activities chosen for the particular permit year. .

Responsible Party: Department of General Services (Table 1).

Schedule: In the first quarter of each permit cycle, DGS will determine which Public Involvement Opportunities it will conduct or support. .

Items to Report:
1. List of local activities in which County participated.
2. Identification of which activities met the MS4 General Permit, Table 2 criteria.

Method of Evaluation: Successful completion or support of four (4) activities as outlined above annually.

Table 2 Public Involvement Opportunities	
Public involvement opportunities	Examples (provided as example and are not meant to be all inclusive or limiting)
Monitoring	Establish or support citizen monitoring group
Restoration	Stream or watershed clean-up day, adopt-a-water way program,
Educational events	Booth at community fair, demonstration of stormwater control projects, presentation of stormwater materials to schools to meet applicable education Standards of Learning or curriculum requirements, watershed walks, participation on environmental advisory committees
Disposal or collection events	Household hazardous chemicals collection, vehicle fluids collection
Pollution prevention	Adopt-a-storm drain program, implement a storm drain marking program, promote use of residential stormwater BMPs, implement pet waste stations in public areas, adopt-a-street program.

Figure 2: MS4 General Permit Table 2



MCM 3: Illicit Discharge Detection and Elimination

BMP 3A: Develop an Accurate MS4 Map

Permit Section: Part I E 3 a (1)

Objective: Develop and maintain an accurate MS4 Map of the stormwater system. Loudoun County utilizes various GIS data layers for all stormwater asset management. Every 6 months, in January and June, a pdf copy of the MS4 map will be generated utilizing the most up to date versions of the stormwater GIS data layers, as outlined below.

Measurable Goal: Semi-Annual updates to the county MS4 map as follows:

1. A map of the stormwater system owned or operated by the permittee within the Census Urbanized Area identified by the 2010 decennial census that includes:
 - a. MS4 outfalls discharging to surface waters;
 - b. A unique identifier for each mapped item;
 - c. The name and location of receiving waters to which the MS4 outfall or point of discharge discharges;
 - d. MS4 regulated service area; and
 - e. Stormwater management facilities owned or operated by the permittee.

Necessary Documents: Loudoun County GIS Data.

Responsible Party: Department of General Services (Table 1).

Schedule: January and June of each year. Publish a pdf copy of the MS4 map.

No later than July 1, 2019 [Part I E 3a (3)] the permittee shall submit to DEQ a GIS-compatible shapefile of the permittee's MS4 map.

Annually after the July 1, 2019 submission.

Items to Report: Confirmation statement, including dates, of stormwater map updates, digital copy of the current map.

Method of Evaluation: Review of system map to confirm it remains accurate and current.

BMP 3B: Maintain MS4 Outfall Data Information Table

Permit Section: Part I E 3 a (2)

Objective: Maintain specific and required information related to each MS4 outfall.



Measurable Goal: Annual updates to the County's outfall data table that includes the following information for each outfall or point of discharge:

1. A unique identifier as specified on the stormwater system map;
2. The latitude and longitude of the outfall or point of discharge;
3. The estimated regulated acreage draining to the outfall or point of discharge;
4. The name of the receiving water;
5. The 6th Order Hydrologic Unit Code of the receiving water;
6. An indication as to whether the receiving water is listed as impaired in the Virginia 2016 305(b)/303(d) Water Quality Assessment Integrated Report;
7. The predominant land use for each outfall discharging to an impaired water; and
8. The name of any EPA approved TMDLs for which the permittee is assigned a wasteload allocation.

Necessary Documents: Annual Outfall Data Information Table (Appendix A).
2016 303(d)/305(b) list.

Responsible Party: Department of General Services (Table 1).

Schedule: No later than October 1 of each year.

Items to Report: Confirmation statement, including dates, of MS4 Outfall Data Information Table updates.

Method of Evaluation: Review of GIS Data Information Tables associated with County Stormwater System Map and MS4 Outfall Data Information.

BMP 3C: Notification to Downstream MS4 Permit Holders of Interconnections.

Permit Section: Part I E 3 a (5)

Objective: Notify downstream MS4 operators, in writing, of any physical interconnections to the County's MS4. As required in Part I E 3 d (2), the written notification to downstream interconnected MS4s will be provided upon request.

Measurable Goal: Written notification of any applicable downstream MS4 operators of stormwater systems physically interconnected with the Loudoun County MS4.

Necessary Documents: County Stormwater GIS Data.

Responsible Party: Department of General Services (Table 1).

Schedule: Completion by end of Permit Year 1.



Items to Report: List of any written notifications to applicable downstream MS4 operators.

Method of Evaluation: Successful notification of any applicable downstream MS4 operators.

BMP 3D: Written IDDE Procedures

Permit Section: Part I E 3 c

Objective: Written procedures to detect, identify, and address unauthorized nonstormwater discharges to the MS4. As required in Part I E 3 d (3), the revised IDDE procedures will be provided upon request.

Measurable Goal: Implement the County's IDDE procedures to address suspected illicit discharges.

Necessary Documents: Existing IDDE Procedures (Appendix A).

Responsible Party: Department of General Services (Table 1).

Schedule: Year 1 – Revise/update the IDDE procedures.

Ongoing program, with implementation of revised IDDE procedures by the start of Permit Year 2.

Items to Report: Total number of IDDE incidences found each permit year and a summary of how the issue was resolved.

Method of Evaluation: Review of IDDE procedures the success in detecting illicit discharges to the County's MS4.

BMP 3E: Conduct System Screening for Illicit Discharge Detection

Permit Section: Part I, E 3 c (2)

Objective: Effectively and efficiently identify, to the MEP, illicit discharges to the County's MS4.

Measurable Goal: Conduct dry weather screening of MS4 outfalls per the IDDE procedures (Appendix A).

Necessary Documents: IDDE Procedure (Appendix A).

Responsible Party: Department of General Services (Table 1).



<u>Schedule:</u>	Ongoing program, with implementation of revised IDDE procedures in Year 1.
<u>Items to Report:</u>	Items to report are summarized in the IDDE Procedure document (Appendix A). Total number of outfalls screened, screening results, and detail of any related follow-up actions.
<u>Method of Evaluation:</u>	Review of IDDE procedures, including dry weather screening, and their success in detecting illicit discharges to the County's MS4.

BMP 3F: Investigate and Address Illicit Discharges

<u>Permit Section:</u>	Part I E 3 c (3), (4), and (5)
<u>Objective:</u>	Eliminate, to the MEP, illicit discharges to the MS4 based on the County's revised IDDE procedures established per Part I 3 c of the MS4 General Permit.
<u>Measurable Goal:</u>	Implement the County's IDDE procedures to address suspected illicit discharges discovered through dry weather screening, observations of County staff, or calls and reports from the general public.
<u>Necessary Documents:</u>	IDDE Procedure as outlined in Part I E 3 c County Stormwater Management Ordinance (Chapter 1096, Codified Ordinances of Loudoun County, §1096.04: Violations)
<u>Responsible Party:</u>	Department of General Services (Table 1).
<u>Schedule:</u>	Ongoing program, with implementation of revised IDDE procedures in Year 1.
<u>Items to Report:</u>	Summary of each investigation of any suspected illicit discharge as follows: <ol style="list-style-type: none">1. Date(s) suspected discharge observed and/or reported;2. Results of the investigation, including the source, if identified;3. Any follow-ups to the investigation;4. Resolution of investigation; and5. Date investigation completed/closed.
<u>Method of Evaluation:</u>	Review of IDDE procedures and their success in finding and eliminating illicit discharges to the County's MS4.



MCM 4: Construction Site Stormwater Runoff Control

BMP 4A: Administer County E&S Program

Permit Section: Part I E 4 a (1) and (5)

Objective: Ensure, to the MEP, that administration and implementation of County E&S. The permittee shall implement the VESCP consistent with the Virginia Erosion and Sediment Control Law (§ 62.1-44.15:51 et seq. of the Code of Virginia) and Virginia Erosion and Sediment Control Regulations (9VAC25-840).

Measurable Goal: Maintain a rating of “consistent” for the County’s E&S Program during permit cycle.

Necessary Documents: Most current version of documents, as follows:

- a. Facilities Standards Manual (FSM) (Appendix A)
- b. E&S Ordinance (County Code Chapter 1220) (Appendix A)
- c. Loudoun County Grading Permit Packet (Appendix A)
- d. Plan Review Checklist (Appendix A)
- e. Site Inspection Checklist (Appendix A)
- f. Compliance and Enforcement Policies (Appendix A)

Responsible Party: Department of Building and Development (Table 1).

Schedule: Ongoing program.

Items to Report: For each annual report, the following shall be tracked and submitted:

- a. Total number of inspections conducted
- b. Total number and type of enforcement actions implemented and the type enforcement actions.

BMP 4B: MCM 4 Items to Include in the Program Plan

Permit Section: Part I E 4 c

Objective: To include those required items of Part I E 4 c, which are applicable to Loudoun County. The applicable items to Loudoun County are:

1. If the permittee implements a construction site stormwater runoff control program in accordance with Part I E 4 a (1), the local ordinance citations for the VESCP program;
2. A description of the legal authorities utilized to ensure compliance with Part I E 4 a to control construction site stormwater runoff control such as ordinances, permits, orders, specific contract language, policies, and interjurisdictional agreements;



3. Written inspection procedures to ensure the erosion and sediment controls are properly implemented and all associated documents utilized during inspection including the inspection schedule;
4. Written procedures for requiring compliance through corrective action or enforcement action to the extent allowable under federal, state, or local law, regulation, ordinance, or other legal mechanisms; and
5. The roles and responsibilities of each of the permittee's departments, divisions, or subdivisions in implementing the construction site stormwater runoff control requirements in Part I E 4.

Measurable Goal: Not applicable.

Necessary Documents: Most current version of documents, as follows:
a. E&S Ordinance (County Code Chapter 1220)
b. Stormwater Ordinance (County Code Chapter 1096)

Responsible Party: Department of Building and Development (Table 1).
Department of General Services (Table 1).

Schedule: Not applicable.

Items to Report: The local ordinance for the Loudoun County Erosion and Sediment Program is the Codified Ordinances of Loudoun County Chapter 1220 ([link](#)).

The legal authorities utilized to ensure compliance with Part I E 4 are; the Codified Ordinances of Loudoun County, Chapters 1220 Erosion Control ([link](#)); 1096 Stormwater Management ([link](#)); and the MS4 General Permit (VAR040067).

The Department of Building and Development maintains SOPs for Erosion and Sedimentation Control inspection and enforcement (Appendix A).

Erosion and Sedimentation Control Program Enforcement Protocols, Dated September 6, 2002 ([link](#)).

Department of Building and Development

- E&S plan review
- E&S inspections and enforcement
- VSMP permit compliance

Department of General Services

- Post-construction BMP maintenance and inspection
- MS4 permit compliance



Method of Evaluation: Not applicable.

BMP 4C: MCM 4 Items to Include in the Annual Report

Permit Section: Part I E 4 d

Objective: To include those required items outlined in Part I E 4 d, which are required to be included in the annual report.

The annual report shall include the following:

1. Total number of inspections conducted; and
2. The total number and type of enforcement actions implemented and the type of enforcement actions.

Measurable Goal: Report the items listed above.

Necessary Documents: E&S inspections. Need to report the total number.

E&S enforcement actions. Need to report the total number.

Responsible Party: Department of Building and Development. B&D is responsible for conducting the inspections and maintaining the required files.

Department of General Services. DGS is responsible for reporting this information in the annual report.

Schedule: Annual.

Items to Report: Total number of E&S inspections conducted.

The total number and type of enforcement actions implemented and the type of enforcement actions.

Method of Evaluation: NA.



MCM 5: Post-Construction Stormwater Management for New Development and Development on Prior Developed Lands

BMP 5A: Administer County VSMP Program

Permit Section: Part I, E 5 a (1)

Objective: The permittee shall address post-construction stormwater runoff that enters the MS4 from the following land disturbing activities by implementing a post-construction stormwater runoff management program as follows:

If the permittee is a city, county, or town, with an approved Virginia Stormwater Management Program (VSMP), the permittee shall implement the VSMP consistent with the Virginia Stormwater Management Act (§ 62.1-44.15:24 et seq. of the Code of Virginia) and VSMP Regulations (9VAC25-870) as well as develop an inspection and maintenance program in accordance with Parts I E 5 b and c.

Measurable Goal: To the MEP Loudoun County will administer its VSMP consistent will all applicable state regulations.

Necessary Documents: Stormwater Management Ordinance (Chapter 1096, Codified Ordinances of Loudoun County).
County stormwater facility inspection checklist.
County inspections and maintenance written procedures.

Responsible Party: Department of Building and Development.

Schedule: Daily plan review for land disturbance projects submitted to the County for approval.

Items to Report: Written statement that the County is in compliance with the state code outlined within this section.

Method of Evaluation: Annual review of the program to ensure compliance.

BMP 5B: Develop and Maintain Written Inspection and Maintenance Procedures for Stormwater BMPs

Permit Section: Part I, E 5 b (1)

Objective: Ensure, to the MEP, that the County's inspection and maintenance program for the post-construction stormwater management facilities is documented and followed by county staff and contractors.

Measurable Goal: The County will continue to follow the current inspection and maintenance procedures. In Year 1, the county will review its current procedures and



update them as needed. County will implement any changes to the procedures in the following permit years.

<u>Necessary Documents:</u>	Stormwater Management Ordinance (Chapter 1096, Codified Ordinances of Loudoun County) County inspections and maintenance written procedures (Appendix A).
<u>Responsible Party:</u>	Department of General Services.
<u>Schedule:</u>	Year 1 – review existing procedures and update as needed. Following permit years - ongoing program.
<u>Items to Report:</u>	Compliance with procedures.
<u>Method of Evaluation:</u>	Review the procedures to ensure they are still meeting the needs of the program.

BMP 5C: Inspect Permanent Post-Construction Stormwater BMPs

<u>Permit Section:</u>	Part I E 5 b (2)
<u>Objective:</u>	Ensure, to the MEP, that the County’s permanent post-construction stormwater management facilities are functioning as designed for stormwater runoff quality and quantity management.
<u>Measurable Goal:</u>	The County will perform annual inspections of the permanent post-construction stormwater management BMPs either owned by the County or within the County and situated outside of the VDOT maintained right-of-way, Dulles Greenway property and right-of-way, Dulles International Airport property and right-of-way, the County’s incorporated towns, and are not a separately permitted facility.
<u>Necessary Documents:</u>	Stormwater Management Ordinance (Chapter 1096, Codified Ordinances of Loudoun County). County stormwater facility inspection checklists. County inspections and maintenance written procedures.
<u>Responsible Party:</u>	Department of General Services.
<u>Schedule:</u>	Annual.
<u>Items to Report:</u>	The total number of private and public BMP inspections completed.



For private BMP inspections, the total number of enforcement actions will be noted.

For public BMP inspections, a description of the significant maintenance repair or retrofit activities shall be provided.

Method of Evaluation: N/A.

BMP 5D: Provide Long-Term Maintenance for Operator-Owned BMPs

Permit Section: Part I E 5 b (3)

Objective: Provide long-term maintenance, as necessary, so that permanent stormwater facilities for which the County has primary maintenance responsibility are functioning to their original design capabilities.

Measurable Goal: Maintenance performed, as necessary, so applicable stormwater facilities are functioning to original design capabilities.

Necessary Documents: Stormwater management facility inspection reports.
Summary of maintenance performed.

Responsible Party: Department of General Services.

Schedule: Ongoing program.

Items to Report: Total number of inspections conducted.

Description of the significant maintenance, repair, or retrofit activities. Routine maintenance activities (e.g. mowing, trash removal) are not required to be reported.

Method of Evaluation: N/A

BMP 5E: Require Adequate Long-Term Maintenance for Privately Maintained BMPs

Permit Section: Part I E 5 c (1), and (2)

Objective: Ensure, to the MEP, that permanent stormwater facilities for which the County does not have primary maintenance responsibility (i.e. private facilities) are receiving adequate long-term maintenance to function at their original design capability.

Measurable Goal: Notify property owners responsible for maintaining stormwater management facilities of those deficiencies, discovered during County inspections, keeping the facility from functioning to their original design



capability utilizing enforcement procedures outlined in Chapter 1096, Codified Ordinances of Loudoun County.

Necessary Documents: Stormwater Management Ordinance (Chapter 1096, Codified Ordinances of Loudoun County).

Inspection findings.

Private BMP Enforcement Procedures.

Responsible Party: Department of General Services.

Schedule: Annual.

Items to Report: Number of privately-owned stormwater management facility inspections conducted.

Number of and type of enforcement actions initiated.

Method of Evaluation: Review record of maintenance execution based on requirements conveyed in inspection reports submitted on facilities for which the property owner has primary maintenance responsibilities.

BMP 5F: Maintain an Electronic Database of All Permanent Stormwater Management Facilities

Permit Section: Part I E 5 d, e, f, and g.

Objective: Maintain the electronic database of all known stormwater management facilities (public and private). The database will include all BMPs implemented by the permittee to meet the Chesapeake Bay TMDL load reduction as required in Part II A.

The electronic database shall be updated no later than 30 days after a new stormwater management facility is brought online, a new BMP is implemented to meet a TMDL load reduction as required in Part II, or discovered if it is an existing stormwater management facility.

The County shall use the DEQ Construction Stormwater Database or other application as specified by the department to report each stormwater management facility installed after July 1, 2014, to address the control of post-construction runoff from land disturbing activities for which the permittee is required to obtain a General VPDES Permit for Discharges of Stormwater from Construction Activities.

Measurable Goal: Maintain the existing database.



<u>Necessary Documents:</u>	<p>Inventory of permanent structural stormwater management facilities discharging to the regulated small MS4.</p> <p>2016 303(d)/305(b) list. Most recent inspection results.</p>
<u>Responsible Party:</u>	<p>Department of General Services.</p>
<u>Schedule:</u>	<p>Within 30 days of facility completion/discovery.</p>
<u>Items to Report:</u>	<p>For each stormwater management facilities brought online and taken offline during each reporting year the following information is to be reported:</p> <ol style="list-style-type: none">Facility unique identifierFacility typeGeographic location (latitude and longitude)Number of acres treated by the facility<ol style="list-style-type: none">With breakdown of pervious and impervious acresDate the facility was brought on lineSixth order hydrologic unit code (HUC)Operator- or privately-owned<ol style="list-style-type: none">If privately-owned, whether maintenance agreement existsWhether or not the stormwater management facility or BMP is part of the permittee's Chesapeake Bay TMDL action plan required in Part II A or local TMDL action plan required in Part II B, or bothDate of operator's most recent inspection <p>A confirmation statement that the permittee submitted stormwater management facility information through the Virginia Construction Stormwater General Permit database for those land disturbing activities for which the permittee was required to obtain coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities in accordance with Part I E 5 f or a statement that the permittee did not complete any projects requiring coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities.</p> <p>A confirmation statement that the permittee electronically reported BMPs using the DEQ BMP Warehouse in accordance with Part I E 5 g and the date on which the information was submitted.</p>
<u>Method of Evaluation:</u>	<p>Conduct quality control (i.e., spot check) of database entries made within the permit year to ensure data accuracy.</p>



Pollution Prevention/Good Housekeeping for Municipal Operations

BMP 6A: Maintain and Implement Written Procedures

Permit Section: Part I E 6 a

Objective: Maintain existing written procedures and implement new procedures, as needed, at county-owned facilities within the MS4. The written procedures shall be designed as follows:

1. Prevent illicit discharges;
2. Ensure the proper disposal of waste materials, including landscape wastes;
3. Prevent the discharge of wastewater or permittee vehicle wash water or both into the MS4 without authorization under a separate VPDES permit;
4. Require implementation of best management practices when discharging water pumped from utility construction and maintenance activities;
5. Minimize the pollutants in stormwater runoff from bulk storage areas (e.g., salt storage, topsoil stockpiles) through the use of best management practices;
6. Prevent pollutant discharge into the MS4 from leaking municipal automobiles and equipment; and
7. Ensure that the application of materials, including fertilizers and pesticides, is conducted in accordance with the manufacturer's recommendations.

Measurable Goal: Update the written materials for county-owned facilities within the MS4 boundary.

Necessary Documents: *Existing Standard Operating Procedures (Appendix A).*
Land Disturbing SOP
Landscaping and Grounds Maintenance SOP
Loading-Unloading SOP
Material Storage SOP
Non-Stormwater Discharges SOP
Pool Operation SOP
Road, Street and Parking Lot SOP
Small Equipment SOP
Spill Response SOP
Storm Sewer System Cleaning & Maintenance SOP
Vehicle Fueling SOP
Vehicle-Equipment Maintenance/Repair SOP
Vehicle-Equipment Storage SOP
Vehicle-Large Equipment Washing SOP



Waste Management SOP

Responsible Party: Department of General Services.

Schedule: Year 1 – Review of existing SOPs.
Years 2, 3, 4, and 5 – Implementation.

Items to Report: Year 1 – Updated written procedures.
The written procedures will be provided upon request (Appendix A).

Method of Evaluation: Annual review of written procedures for appropriateness and need of new procedures.

BMP 6B: Develop and Implement SWPPPs for Identified “High Priority” Facilities

Permit Section: Part I E 6 c, d, and g

Objective: The County will continue to implement the SWPPPs that were developed under the previous permit.

Measurable Goal: The County shall follow all parameters within each existing SWPPP..

Necessary Documents: Facility SWPPPs (Appendix A).
Claude Moore Park SWPPP
PRCS Trailside Maintenance Facility SWPPP
Potomac Lakes Sportsplex SWPPP
Fire & Rescue EM Training Center SWPPP
Central Warehouse SWPPP

Responsible Party: Department of General Services.

Schedule: Annual.

Items to Report: Listing of the SWPPPs, dates of annual inspection, any findings, and corrective actions.

Method of Evaluation: Effectiveness of SWPPPs.

BMP 6C: Annual Review for New County Owned or Operated “High Priority” Facilities

Permit Section: Part I E 6 e



Objective: No later than June 30 of each permit year, conduct a review of County owned or operated facilities within the MS4 to determine if the facility has a high potential for discharging pollutants as described in Part I.E.6.c. If the facility is determined to be a high-priority facility with a high potential to discharge pollutants, develop a SWPPP meeting the requirements of Part I.E.6.d no later than December 31 of that same permit year.

Measurable Goal: Annual review of County owned or operated facilities and development of new SWPPPs as needed.

Necessary Documents: Facility SWPPPs (Appendix A).
- Claude Moore Park SWPPP
PRCS Trailside Maintenance Facility SWPPP
Potomac Lakes Sportsplex SWPPP
Fire & Rescue EM Training Center SWPPP
Central Warehouse SWPPP

Responsible Party: Department of General Services.

Schedule: Annual review conducted by June 30 of each permit year.

If needed, development of new SWPPPs by December 31 of each permit year.

Items to Report: Annually – Report the results of the review.

If needed, provide copies of the newly developed SWPPPs.

List of the High Priority facilities owned and/or operated by the MS4 and whether or not they have a high potential to discharge.

Method of Evaluation: Annual review.

BMP 6D: SWPPP Review after Reports of Unauthorized Discharges

Permit Section: Part I E 6 f

Objective: The permittee shall review the contents of any site specific SWPPP no later than 30 days after any unauthorized discharge, release, or spill reported in accordance with Part III G to determine if additional measures are necessary to prevent future unauthorized discharges, releases, or spills. If necessary, the SWPPP shall be updated no later than 90 days after the unauthorized discharge.

Measurable Goal: Investigate all unauthorized discharges to the MS4 at County owned or operated facilities with a SWPPP.

Necessary Documents: Facility SWPPPs.



Responsible Party: Department of General Services.

Schedule: As needed.

Items to Report: Report unauthorized discharges as outline in Part III G.

Method of Evaluation: Review reports and SWPPPs as needed.



BMP 6E: Maintain and Implement Turf and Landscape Nutrient Management Plans (NMPs)

Permit Section: Part I E 6 i

Objective: The permittee shall maintain and implement turf and landscape NMPs that have been developed by a certified turf and landscape nutrient management planner in accordance with § 10.1-104.2 of the Code of Virginia on all lands owned or operated by the permittee where nutrients are applied to a contiguous area greater than one acre. If nutrients are being applied to achieve final stabilization of a land disturbance project, application shall follow the manufacturer's recommendations.

Measurable Goal: Maintain current NMPs as applicable. Annual review of county owned or operated facilities within the MS4 service area to establish the need for new NMPs.

Necessary Documents: County Facilities Nutrient Management Plans (Appendix A).

Responsible Party: Department of General Services with assistance from Parks, Recreation & Community Services.

Schedule: By the end of Year 1 conduct a review of the existing NMPs and a review of county owned or operated facilities that meet the requirements of Part I E 6 i.

Update the plans and create new plans as needed in the following permit years.

Items to Report: Listing of current NMPs and their expiration date and any new NMPs added within the permit year (Appendix A).

Method of Evaluation: Updating of NMPs that require updates and creation of NMPs where applicable.

BMP 6F: Prohibition on the Use of Deicing Agents Containing Nitrogen or Phosphorus

Permit Section: Part I E 6 k

Objective: The permittee shall not apply any deicing agent containing urea or other forms of nitrogen or phosphorus to parking lots, roadways, and sidewalks, or other paved surfaces.

Measurable Goal: Do not use deicing agents that contain the chemicals described in Part I E 6 k.



Necessary Documents: Manufacturer's MSDS for the deicing chemicals used by the Public Works Crew.
SOP – Road, Street, and Parking Lot Maintenance, Version 2, dated May 1, 2019.

Responsible Party: Department of General Services.

Schedule: N/A

Items to Report: Statement that the chemical outlined in Part I E 6 k or not used by the County.

Method of Evaluation: N/A.

BMP 6G: Require Municipal Contractors to Use Appropriate Control Measures and Procedures for Stormwater Discharges

Permit Section: Part I E 6 I

Objective: Require, to the MEP, that municipal contractors use appropriate control measures and procedures for stormwater discharges to the County's MS4.

Measurable Goal: Develop and include verbiage in the appropriate standard agreements for municipal contractors, requiring appropriate control measures/procedures and pollution prevention protocols for stormwater discharges to the County's MS4.

Necessary Documents: Loudoun County Standard Contract. Loudoun County Standard Stormwater Contracting Scopes of Work.

Responsible Party: Department of General Services, with assistance from the County Purchasing Department and County Attorney's Office.

Schedule: In the previous contract, the county added language to its standard contract and to the detailed scope of work template documents specifically for stormwater maintenance contracts.

Items to Report: Report annually that the verbiage remains in these documents.

Method of Evaluation: DGS will confirm annually that the appropriate verbiage is contained within these documents.



BMP 6H: Develop a Training Plan Associated with Stormwater

Permit Section: Part I E 6 m

Objective: The permittee shall develop a training plan in writing for applicable staff that ensures the following:

1. Field personnel receive training in the recognition and reporting of illicit discharges no less than once per 24 months;
2. Employees performing road, street, and parking lot maintenance receive training in pollution prevention and good housekeeping associated with those activities no less than once per 24 months;
3. Employees working in and around maintenance, public works, or recreational facilities receive training in good housekeeping and pollution prevention practices associated with those facilities no less than once per 24 months;
4. Employees and contractors hired by the permittee who apply pesticides and herbicides are trained or certified in accordance with the Virginia Pesticide Control Act (§ 3.2-3900 et seq. of the Code of Virginia. Certification by the Virginia Department of Agriculture and Consumer Services (VCACS) Pesticide and Herbicide Applicator program shall constitute compliance with this requirement;
5. Employees and contractors serving as plan reviewers, inspectors, program administrators, and construction site operators obtain the appropriate certifications as required under the Virginia Erosion and Sediment Control Law and its attendant regulations;
6. Employees and contractors implementing the stormwater program obtain the appropriate certifications as required under the Virginia Stormwater Management Act and its attendant regulations; and
7. Employees whose duties include emergency response have been trained in spill response. Training of emergency responders such as firefighters and law-enforcement officers on the handling of spill releases as part of a larger emergency response training shall satisfy this training requirement and be documented in the training plan.

Measurable Goal: Update of the training plan and successful completion of training classes/modules.

Necessary Documents: Training Plan.

Responsible Party: Department of General Services, with assistance from Department of Parks, Recreation, and Community Services (PRCS) and Building and Development



<u>Schedule:</u>	<p>Continue with existing plan in Year 1.</p> <p>Update existing training plan to meet Part I E 6 m during Year 1 and implement in Year 2.</p>
<u>Items to Report:</u>	<p>Maintain documentation of each training event conducted by the permittee to fulfill the requirements of Part I E 6 m for a minimum of three years after the training event. The documentation shall include the following information:</p> <ol style="list-style-type: none">1. The date of the training event;2. The number of employees attending the training event; and3. The objective of the training event. <p>The training plan can be found here (link).</p>
<u>Method of Evaluation:</u>	<p>Annual review of the Training Plan.</p>



Appendix A

Listing of Loudoun County MS4 Documents Incorporated by Reference

Document Name	Version	Date
Chapter 1096 of the Loudoun County Codified Ordinances	As amended	October 10, 2018
Chapter 1220 of the Loudoun County Codified Ordinances	As amended	December 12, 2017
General VPDES Permit for Discharges of Stormwater from Small Municipal Separate Storm Sewer Systems	VAR040067	November 1, 2018
Loudoun County, Virginia TMDL Action Plan for Reducing Nitrogen, Phosphorus, and Sediment Entering the Chesapeake Bay	Final	June 2015
Loudoun County, Virginia Phase II Chesapeake Bay TMDL Action Plan	Draft	TBD
Loudoun County, Virginia Comprehensive TMDL Action Plan for Benthic TMDLS for the Goose Creek Watershed, Benthic TMDL Development for Bull Run, Bacteria TMDLs for Popes Head Creek, Broad Run, Kettle Run, South Run, Little Bull Run, Bull Run and the Occoquan River	Final	10/1/2015
Public Education and Outreach Plan	Final	August 2014 May 2016 (Revised)
Public Education and Outreach Plan (updated)	Draft	TBD
MS4 Permit Coverage Letter	Final	October 31, 2018
MS4 Map	Final	To be developed in June 2018
MS4 Outfall Table	Final	To be developed during the development of the Year 1 Annual Report.
Illicit Discharge Detection and Elimination (IDDE) Procedure	Fifth	December 2017
Good Housekeeping Standard Operating Procedures (multiple)	Final	June 12, 2015
Loudoun County Facility SWPPPs (multiple)	Final	June 30, 2017
Facilities Standards Manual	As amended	January 15, 2018
Loudoun County Grading Permit Packet	Final	February 11, 2019 (Revised)
Training Schedule and Program	First	June 2014



**Loudoun County Nutrient Management Plans Incorporated by Reference
Location**

Plan Name	Total Acres on Which Nutrients are Applied	Plan Start Date	Plan End Date	Location Address	Location Coordinates (NAD 83, Deg Min Sec)
Bles Park	9.1	4/1/2019	4/1/2020	44830 Riverside Parkway, Ashburn, VA 20147	39° 04' 07" -77° 26' 57"
Byrnes Ridge Park	21.0	4/1/2019	4/1/2020	24915 Mineral Springs Circle, South Riding, VA 20105	38° 55' 43" -77° 33' 08"
Conklin Park	6.1	4/1/2019	4/1/2020	25701 Donegal Drive, Chantilly, VA 20152	38° 54' 29" -77° 31' 25"
Ray Muth Sr. Park	5.4	1/9/2017	1/9/2020	20971 Marblehead Drive, Ashburn, VA 20148	39° 2' 9" -77° 27' 38"
Scott Jenkins Park	2.2	1/9/2017	1/9/2020	39464 Colonial Highway, Hamilton, VA 20158	39° 8' 12" -77° 38' 20"
Trailside Park	2.8	3/15/2015	3/15/2020	Claiborne Parkway, Ashburn, VA 20147	39° 3' 8" -77° 30' 18"
Lyndora Park	2.5	3/15/2015	3/15/2020	Lucketts Bridge Circle, Ashburn VA, 20148	38° 59' 18" -77° 29' 31"
Greg Crittenden Memorial Park	1.6	3/15/2015	3/15/2020	21401 Windmill Dr, Ashburn, VA 20147	39° 1' 56" -77° 29' 49"
Chick Ford & Ryan Bickel Fields	1.5	3/15/2015	3/15/2020	21597 Ashburn Village Blvd, Ashburn, VA 20147	39° 2' 15" -77° 28' 30"
Cascades Library and Senior Center	1.1	9/24/2015	9/24/2020	21030 Whitfield Place Potomac Falls, VA 20165	39° 1' 59" -77° 23' 41"
Ashburn Library NMP	1.1	9/24/2015	9/24/2020	43316 Hay Road, Ashburn VA 20147	39° 2' 45" -77° 30' 9"
Claude Moore Park	9.8	1/9/2017	1/9/2020	46105 Loudoun Park Lane, Sterling, VA 20164	39° 0' 53" -77° 24' 15"
Potomac Lakes Sportsplex	20.1	1/9/2017	1/9/2020	20280 Cascades Parkway, Sterling, VA 20165	39° 3' 14" -77° 22' 42"
East Gate Park	3.4	4/1/2019	4/1/2020	43664 Tall Cedars Parkway, Chantilly, VA 20152	38° 54' 44" -77° 29' 33"