Action Plan for the Tidal Potomac and Anacostia Rivers PCB TMDL

A Plan to Address PWCS' Assigned Wasteload Allocation for the Tidal Potomac and Anacostia Rivers PCB TMDL

Permit #: VAR040100

April 2025

This document addresses Part II B of the VPDES Permit for Discharges of Stormwater from Small Municipal Separate Storm Sewer System. This document serves as a PWCS-specific TMDL Action Plan to identify the best management practices and other interim milestone activities to be implemented to address the PCB wasteload allocation assigned to the PWCS' regulated MS4 area in the *"Total Maximum Daily Loads of Polychlorinated Biphenyls (PCBs) for Tidal Portions of the Potomac and Anacostia Rivers in the District of Columbia, Maryland, and Virginia"* approved by the Environmental Protection Agency on October 31, 2007. For the purposes of this Plan, the 2000 and 2010 Census Urbanized Areas were used to define PWCS' regulated MS4 area as defined in 9VAC25-890 Section 1.

Prince William County Public Schools

PWCS
PRINCE WILLIAM COUNTY PUBLIC SCHOOLS
LAUNCHING THRIVING FUTURES

Wetland Studies and Solutions, Inc.
a DAVEY company

EXECUTIVE SUMMARY

Prince William County Schools (PWCS) is authorized to discharge stormwater from its municipal separate storm sewer system (MS4) under the Virginia Pollutant Discharge Elimination System (VPDES) General Permit for Discharge of Stormwater from Small MS4s (MS4 General Permit). To maintain permit compliance, PWCS implements an MS4 Program Plan that includes best management practices (BMPs) to address six minimum control measures (MCMs) and special conditions for the Total Maximum Daily Loads (TMDLs) in which PWCS has been assigned a wasteload allocation (WLA). The Environmental Protection Agency (EPA) describes a TMDL as a "pollution diet" that identifies the maximum amount of a pollutant the waterway can receive and still meet water quality standards. A WLA determines the required reduction in pollutant of concern loadings from the MS4 to meet those standards. The MS4 General Permit serves as the regulatory mechanism for addressing the load reductions described in the TMDL, predominantly through the requirement of a TMDL Action Plan.

The purpose of this Action Plan is to address the WLA assigned to PWCS for the Potomac and Anacostia Rivers TMDL in accordance with the special conditions in the MS4 General Permit. The TMDL entitled the "*Total Maximum Daily Loads of Polychlorinated Biphenyls (PCBs) for Tidal Portions of the Potomac and Anacostia Rivers in the District of Columbia, Maryland, and Virginia,*" approved by the EPA on October 31, 2007, assigns a WLAs to Prince William County Public Schools (Permit No. VAR040100). The TMDL for all of the tidal Potomac and its watershed, including the 28 impaired water quality segment PCB, constitutes a 95.9% overall reduction of PCBs from the 2005 Baseline year load of 37,140 grams/year. The Action Plan addresses PCBs in accordance with the special conditions, demonstrating that the PWCS uses an adaptive and iterative approach to reduce or eliminate the pollutant to the maximum extent practicable. Compliance with the special conditions is demonstrated within the Action Plan through:

- ✓ Summary of the PWCS' MS4 Program Plan MCMs list laws, programs, and other regulatory mechanisms relied upon by PWCS that are applicable to reducing PCBs;
- ✓ PWCS' MS4 Public Education and Outreach strategy and plan;
- ✓ An assessment of PWCS-owned and operated properties; and
- ✓ A methodology to measure Action Plan effectiveness through MS4 annual reporting.

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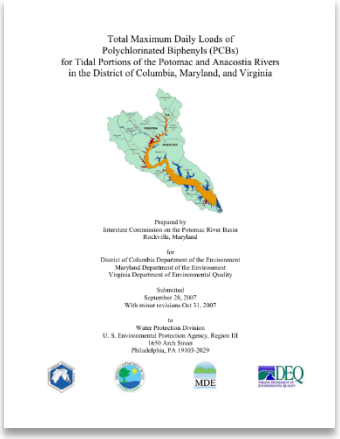
ACRONYMS

BMP	Best Management Practice
CATS	Custodial Advisory Training Sessions
CUA	Census Urbanized Area
CWA	Clean Water Act
DEQ	Virginia Department of Environmental Quality
EPA	Environmental Protection Agency
IDDE	Illicit Discharge Detection and Elimination
LA	Load Allocation
MCM	Minimum Control Measure
MEP	Maximum Extent Practicable
MOS	Margin of Safety
MS4	Municipal Separate Stormwater Sewer System
MS4 GP	General Permit for Discharge of Stormwater from Small MS4s
NPDES	National Pollutant Discharge Elimination System
PCBs	Polychlorinated Biphenyls
PWCS	Prince William County Schools
SWPPP	Stormwater Pollution Prevention Plan
SWM	Stormwater Management
SOL	Virginia Standards of Learning
TMDL	Total Maximum Daily Load
VPDES	Virginia Pollutant Discharge Elimination System
VSMP	Virginia Stormwater Management Program
WLA	Wasteload Allocation

1.0 INTRODUCTION AND PURPOSE


Total Maximum Daily Loads of
Polychlorinated Biphenyls (PCBs)
for Tidal Portions of the Potomac and Anacostia Rivers
in the District of Columbia, Maryland, and Virginia

Prepared by
Interstate Commission on the Potomac River Basin
Rockville, Maryland

for
District of Columbia Department of the Environment
Maryland Department of the Environment
Virginia Department of Environmental Quality

Submitted
September 28, 2007
With minor revisions Oct 31, 2007

to
Water Protection Division
U. S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Mandated by Congress under the Clean Water Act , the National Pollutant Discharge Elimination System (NPDES) storm water program includes the Municipal Separate Storm Sewer System (MS4), Construction, and Industrial General Permits. In Virginia, the NPDES Program is administered by the Virginia Department of Environmental Quality (DEQ) through the Virginia Stormwater Management Program (VSMP) and the Virginia Pollutant Discharge Elimination System (VPDES). Prince William County Schools (PWCS) is authorized to discharge stormwater from its MS4 under the VPDES General Permit for Discharge of Stormwater from Small MS4s (MS4 General Permit). As part of the MS4 General Permit authorization, PWCS developed and implements an MS4 Program Plan with best management practices (BMPs) to address the six minimum control measures (MCMs) and the special conditions for applicable total maximum daily loads (TMDLs), as outlined in the MS4 General Permit. Implementation of these BMPs is consistent with the provisions of an iterative MS4 Program, which constitutes compliance with the standard of reducing pollutants to the "maximum extent practicable."

PCBs are a group of synthetic chemicals consisting of 209 different compounds and are known to be carcinogenic in humans. The particularly stable structure of the compounds allows them to accumulate in the fatty tissue of fish and other animals, causing bioaccumulation in the food chain and a threat to human health. The Commonwealth of Virginia's 2006 305(b)/303(d) Integrated Report identifies 19 tidal embayments of the Potomac River as impaired due to PCBs. These Water Quality Limited Segments (WQLSs) are designated for primary contact recreation, fish consumption, shellfish consumption (from Upper Machodoc Creek to the Potomac mouth), and aquatic life use (VA DEQ 2006a). As a consequence, the PCB TMDL for the Tidal Portions of the Potomac and Anacostia Rivers was developed and approved by the Environmental Protection Agency (EPA) on October 31, 2007.

1.1 Total Maximum Daily Loads

A TMDL is the amount of pollutant a water body can assimilate and still meet water quality standards for its designated use. Typically, TMDLs are represented numerically in three main components:

- WLA for point source contributions and MS4 Permit operators.
- Load Allocations (LA) for non-point source contributions and natural background sources.
- Margin of Safety (MOS)

Point source pollution is any single identifiable source from which pollutants are discharged. If point source discharges, including a permitted MS4, are present in the TMDL watershed, then any allocations assigned to that permittee must be in the form of a WLA. PWCS' MS4 outfalls are

defined as point source discharges and therefore fall under this category in the TMDL. Pollution that is not from an identifiable source, such as a pipe or a ditch, but rather originates from multiple sources over a relatively large area, are considered to be non-point source pollution. These sources are typically categorized as contaminated sites, where analysis of on-site soil samples found measurable concentrations of PCBs, and where LAs are assigned for each. The MOS is a required component that accounts for the modeling uncertainty in the response of the waterbody to loading reductions and in this TMDL is included both implicitly in conservative estimates. The TMDL is expressed in the following equation:

$$TMDL = \sum WLA + \sum LA + MOS$$

The TMDL represents the sum of calculable sources plus a margin of safety that is required to not exceed the state water quality standard. Water quality targets for PCBs are derived from bioaccumulation factors and the Virginia DEQ fish tissue criterion for total PCBs, which are developed to be protective of fish for human consumption. The human health criterion that applies to waterbodies used for public water supply is also covered under this approach, though it is less stringent.

1.2 MS4 General Permit TMDL Special Conditions

PWCS operates a regulated MS4 that lies within the Tidal Potomac and Anacostia Rivers PCB TMDL watersheds and is therefore subject to the WLAs assigned in the TMDL. The special conditions for the TMDL listed in the MS4 General Permit require PWCS to develop a TMDL Action Plan designed to reduce loadings for pollutants of concern where PWCS is given a WLA to an impaired water for which a TMDL has been approved by the EPA as described below:

- For TMDLs approved by the EPA prior to July 1, 2018, and in which an individual or aggregate wasteload has been allocated to PWCS, PWCS shall update the previously approved local TMDL action plans to meet the conditions of Part II B 4, B 6, B 7, and B 8 as applicable, no later than 18 months after the permit effective date and continue implementation of the action plan. Updated action plans shall include:
    1) An evaluation of the results achieved by the previous action plan; and
    2) Any adaptive management strategies incorporated into updated action plans based on action plan evaluation.
- For TMDLs approved by EPA on or after July 1, 2018, and prior to October 31, 2023, and in which an individual or aggregate wasteload has been allocated to PWCS, PWCS shall develop and initiate implementation of action plans to meet the conditions of Part II B 4, B 5, B 6, B 7, and B 8 as applicable for each pollutant for which wasteloads have been allocated to PWCS MS4 no later than 30 months after the permit effective date.

PWCS shall complete implementation of the TMDL action plans as determined by a schedule. TMDL action plans may be implemented in multiple phases over more than one permit cycle using the adaptive iterative approach provided adequate progress is achieved in the implementation of BMPs designed to reduce pollutant discharges in a manner that is consistent with the assumptions and requirements of the applicable TMDL. Each local TMDL action plan developed by PWCS shall include the following:

Each local TMDL action plan developed by PWCS shall include the following:

- The TMDL project name;
- The EPA approval date of the TMDL;
- The wasteload allocated to PWCS (individually or in aggregate), and the corresponding percent reduction, if applicable;
- Identification of the significant sources of the pollutant of concern discharging to PWCS' MS4 and that are not covered under a separate VPDES permit. For the purposes of this requirement, a significant source of pollutants means a discharge where the expected pollutant loading is greater than the average pollutant loading for the land use identified in the TMDL;
- The BMPs designed to reduce the pollutants of concern in accordance with Parts II B 5, B 6, B 7, and B8;
- Any calculations required in accordance with Part II B 5, B 6, B7, or B 8;
- For action plans developed in accordance with Part II B 5, B 6, and B 8, an outreach strategy to enhance the public's education (including employees) on methods to eliminate and reduce discharges of the pollutants; and
- A schedule of anticipated actions planned for implementation during this permit term.

1.3 PWCS' PCB Action Plan

The purpose of PWCS' Action Plan for the Tidal Potomac and Anacostia Rivers PCB TMDL is to address each of the Local TMDL special conditions listed in Part II B. As an adaptive and iterative approach to meet surface water quality goals, the Action Plan may be revised from time to time to reduce PCB discharges from PWCS' MS4 to the maximum extent practicable (MEP).

The MS4 General Permit requires an inventory of potentially significant sources of PCBs owned or operated by PWCS that drains to the MS4 that includes the following information:

(1) Location of the potential source;

(2) Whether or not the potential source is from current site activities or activities previously conducted at the site that have been terminated (i.e. legacy activities); and

(3) A description of any measures being implemented or to be implemented to prevent exposure to stormwater and the discharge of PCBs from the site.

If at any time during the term of this permit, PWCS discovers a previously unidentified significant source of PCBs within the PWCS' MS4 regulated service area, PWCS shall notify DEQ in writing within 30 days of discovery.

This Action Plan is incorporated, by reference, into PWCS' MS4 Program Plan, which outlines the BMPs that address the entirety of the conditions set forth in the MS4 General Permit.

2.0 TIDAL POTOMAC AND ANACOSTIA RIVERS PCB TMDL

The Potomac River estuary stretches 117 miles (188 km) from its mouth at Point Lookout, Maryland, and Smith Point, Virginia, to its head-of-tide just upstream of Chain Bridge in the District of Columbia. The total surface area of tidal waters, including the Potomac River embayments and tidal Anacostia River, covers about 434 square miles (1,125 km^2). The lower Potomac River basin, draining into these tidal waters, spans 2,537 square miles (6,572 km^2), roughly one-sixth of the entire basin area.

The tidal waters of Virginia within the Potomac River estuary study area are designated for primary contact recreation, fish consumption, and aquatic life use. Additional uses linked to the Chesapeake Bay and its tidal tributaries include migratory fish spawning and nursery, open water, deep water, and deep channel. These designations apply to the estuary both geographically and temporally, as outlined in the Virginia 2006 Water Quality Assessment Guidance Manual. Additionally, the tidal waters from Upper Machodoc Creek to the mouth of the Potomac River at Smith Point are designated as shellfish waters. The PCB impairment is due to violations to water quality standards as it relates to safe human consumption of fish. This particular pollutant is typically found in lake, stream, and river sediments in watersheds that have been contaminated or were contaminated prior to the ban on manufacture and use of PBCs in 1979. Due to significant resistance to breakdown, PCBs remain associated with sediment for many years, and sites and facilities that are no longer directly associated with PCB handling may still be discharging the pollutant due to historical contamination.

2.1 Wasteload Allocation

The TMDL for all of the tidal Potomac and its watershed, including the 28 impaired water quality segment PCB, constitutes a 95.9% overall reduction of PCBs from the 2005 Baseline year load of 37,140 grams/year. In the tidal Potomac watershed, the loads from the regulated NPDES stormwater outfalls are represented as a single stormwater WLA for each impaired water body which are calculated for the direct drainage areas in the District of Columbia, as well as for the Maryland and Virginia counties covered by an NPDES stormwater permit. The TMDL states, "Lists of Municipal- and County-level MS4 permits in the District of Columbia, Maryland and Virginia. The jurisdictions to which these permits apply may be located within both direct drainage and tributary watershed segments; however, the NPDES regulated stormwater WLAs apply only to the direct drainage portions of the MS4 permitted jurisdictions." **Therefore, the WLA only applies to direct drainage watersheds.** Prince William County School MS4 properties are located in Watershed Codes 5251 and 5491. Watershed 5251 has an 85.8% reduction, and 5491 has a 5% reduction, which have a combined 70.6% total reduction. The schools in Table 1 are within the direct drainage watershed of the TMDL and in the census urbanized area. However, the PCB assessment included all PWCS built before 1979.

Table 1: PWCS Properties in Direct Drainage and CUA

PWCS Properties		
Ann Ludwig	Henderson ES	Potomac HS-MS & Williams ES
Ashland ES	Hylton HS	Potomac Shores MS
Bel Air ES	Jenkins ES	Potomac View ES
Belmont ES	Kerrydale ES	Rippon MS
Benton MS and Coles ES	Kilby ES	River Oaks ES
Beville MS	King ES	Rockledge ES
Covington-Harper ES	Leesylvania ES	Rosa Parks ES
Dale City ES	Fred M. Lynn MS	Saunders MS
Enterprise ES	Marumsco Hills ES	Swans Creek ES
Featherstone ES	McAuliffe ES	Transportation Center East
Fannie Fitzgerald ES	Minnieville ES	Triangle ES
Forest Park HS	Montclair ES	Vaughan ES
Freedom HS	Occoquan ES	Wilson ES
Gar-Field HS and Transportation Center	Pattie ES	Woodbridge MS
Graham Park MS	Penn ES	
Hampton MS	Porter Traditional	

2.2 Characterization of PCB Sources in the TMDL

Potential sources of PCBs from MS4s are classified in the TMDL as either current or legacy. Current sources have a pathway to a waterbody that is defined and that is also able to be controlled or disrupted. Legacy sources are often not as easily defined, as they exist at the interface with a waterbody where there is a continuous exchange of material. Legacy sources cannot be easily controlled due to having no disruptable pathway; they must be removed at the source. Examples of each are as follows:

Current Source Examples

- Contaminated Soils – Upland facilities and lands that are or were historically associated with PCB handling may contain contaminated soil. If not properly protected or removed, soil that comes in contact with stormwater can be washed into waterbodies.
- Leachate – Landfill sites and industrial disposal areas containing PCBs, if not properly capped or lined, may release contaminated water that has infiltrated. This leachate then becomes associated with the surrounding soil and may be washed into a waterbody.
- Transformers and Storage Containers – Many electrical transformers manufactured prior to 1979 used PCBs as fire-retardant ballast. Fluorescent light fixtures installed in buildings prior to 1979 may also contain PCB ballast. These materials, and any containers used to store them, are potential sources.

- Effluent Discharge – Liquids containing PCBs may be released into the storm drain or sanitary sewer.
- Off-gassing Deposition – Contaminated sites where PCBs are exposed to the air may produce off-gassing of PCB molecules. These can then be carried into the atmosphere and redeposited locally.

Legacy Source Examples

- In-stream Sediments – PCBs washed into streams can become associated with streambed sediment and be rereleased when shear stress is excessive, such as during a heavy storm event.
- Streambank soils – Contaminated soils within a streambank may become eroded during storm events, releasing PCBs into the downstream flow.
- Biota – Animals exposed to PCBs may accumulate them in their fatty tissue, where they may remain for its lifetime. Some plants may also accumulate PCBs through their roots or via atmospheric deposition.
- Atmospheric Deposition – Background concentrations in the atmosphere may be deposited directly to waterbodies.

3.0 POTENTIAL PCB SOURCE CHARACTERIZATION

Consistent with the special conditions of the MS4 General Permit, properties owned and operated by PWCS were assessed to determine their potential for presence of sources of PCBs to PWCS' MS4 or directly into surface waters. Potential sources include facilities that were constructed prior to the PCB ban in 1979, those associated with the municipal waste stream, those potentially producing PCB pollution due to former site uses, or those storing any PCB related materials.

3.1 PWCS Property Assessment

For the purposes of this Action Plan, PWCS properties within the impacted watersheds constructed prior to 1979 are considered potential significant PCB sources, listed in Table 2 below. Any known potential sources are from legacy activities. No current or active PCB sources have been found on PWCS property. Based on original construction dates of the remaining PWCS facilities within the impacted watersheds, no other facilities are considered potential significant PCB sources.

Table 2: Schools with Direct Drainage, within CUA, and Built Before 1979

School	Year Constructed	Status
Ann Ludwig	1975	Decommissioned as a school. Vacant.
Bel Air ES	1968	Renovated in 2007
Belmont ES	1967	Renovated in 2005/2006
Coles ES	1968	Renovated in 2007/2008
Dale City ES	1967	Renovated in 2006
Enterprise ES	1978	Renovated in 2008
Featherstone ES	1961	Renovated in 2000
Gar-Field HS	1972	Renovated in 2024
Graham Park MS	1963	Renovated in 2000/2001
Hampton MS	1970	Renovated in 2009
Kerrydale ES	1973	Renovated in 2006 - 2008
Kilby ES	1959	Demolished in 2018
Fred M. Lynn MS	1964	Renovated in 2000/2001
Marumsco Hills ES	1966	Renovated in 2005
Minnieville ES	1972	Renovated in 2004
Occoquan ES	1927	Scheduled for demolition. New building under construction anticipated completion in 2026.
Pattie ES	1978	Renovated in 2012
Potomac View ES	1964	Renovated in 2005/2006
Rippon MS	1967	Renovated in 2009
Rockledge ES	1972	Renovated in 2007
Triangle ES	1957	Demolished in 2009
Vaughan ES	1964	Renovated in 2004/2005
Woodbridge MS	1963	Renovated in 2013/2014

The status of school renovations are described below. All PWCS sites with potentially significant PCBs have been renovated. Any remaining PCB sources, typically associated with materials such as caulking and paint, are considered legacy sources from past construction practices.

Anne Ludwig was decommissioned as a school and is vacant.

Bel Air Elementary was renovated in 2007, including replacement of all potentially PCB-containing fluorescent lamp ballasts. Containerized universal waste was transported by a licensed hauler to an EPA approved incineration facility. All identified PCB sources have been removed from this facility.

Belmont Elementary and Potomac View Elementary were renovated in 2005/2006, including replacement of all potentially PCB-containing fluorescent lamp ballasts. Containerized universal waste was transported by a licensed hauler to an EPA approved incineration facility. All identified PCB sources have been removed from these facilities.

Coles Elementary was renovated in 2007/2008, including replacement of all potentially PCB-containing fluorescent lamp ballasts. Containerized universal waste was transported by a licensed hauler to an EPA approved incineration facility. All identified PCB sources have been removed from this facility.

Dale City Elementary was renovated in 2006, including replacement of all potentially PCB-containing fluorescent lamp ballasts. Containerized universal waste was transported by a licensed hauler to an EPA approved incineration facility. All identified PCB sources have been removed from this facility.

Enterprise Elementary was renovated in 2008, including replacement of all potentially PCB-containing fluorescent lamp ballasts. Containerized universal waste was transported by a licensed hauler to an EPA approved incineration facility. All identified PCB sources have been removed from this facility.

Featherstone Elementary was renovated in 2000, including replacement of all potentially PCB-containing fluorescent lamp ballasts. Containerized universal waste was transported by a licensed hauler to an EPA approved incineration facility. All identified PCB sources have been removed from this facility.

Fred M. Lynn Middle and Graham Park Middle were renovated in 2000/2001, including replacement of all potentially PCB-containing fluorescent lamp ballasts. Containerized universal waste was transported by a licensed hauler to an EPA approved incineration facility. All identified PCB sources have been removed from these facilities.

Garfield High was renovated in 2024, including replacement of all potentially PCB- containing fluorescent lamp ballasts. Containerized universal waste was transported by a licensed hauler to an EPA approved incineration facility. All identified PCB sources have been removed from this facility.

Hampton Middle was renovated in 2009, including replacement of all potentially PCB-containing fluorescent lamp ballasts. Containerized universal waste was transported by a licensed hauler to an EPA approved incineration facility. All identified PCB sources have been removed from this facility.

Kerrydale Elementary was renovated 2006 - 2008, including replacement of all potentially PCB-containing fluorescent lamp ballasts. Containerized universal waste was transported by a licensed hauler to an EPA approved incineration facility. All identified PCB sources have been removed from this facility.

Kilby Elementary was replaced in 2018. During demolition of the old school building, all potential PCB containing ballasts and window caulking was removed. Containerized universal waste was transported by a licensed hauler to an EPA approved incineration facility. All identified PCB sources have been removed from this facility.

Marumsco Hills Elementary was renovated in 2005, including replacement of all potentially PCB-containing fluorescent lamp ballasts. Containerized universal waste was transported by a licensed hauler to an EPA approved incineration facility. All identified PCB sources have been removed from this facility.

Minnieville Elementary was renovated in 2004, including replacement of all potentially PCB-containing fluorescent lamp ballasts. Containerized universal waste was transported by a licensed hauler to an EPA approved incineration facility. All identified PCB sources have been removed from this facility.

Occoquan Elementary is scheduled for demolition after the new building is completed. The new building is anticipated to be completed in 2026.

Pattie Elementary were renovated in 2012, including replacement of all potentially PCB-containing fluorescent lamp ballasts. Containerized universal waste was transported by a licensed hauler to an EPA approved incineration facility. All identified PCB sources have been removed from these facilities.

Rippon Midde was renovated in 2009, including replacement of all potentially PCB-containing fluorescent lamp ballasts. Containerized universal waste was transported by a licensed hauler to an EPA approved incineration facility. All identified PCB sources have been removed from this facility.

Rockledge Elementary was renovated in 2007, including replacement of all potentially PCB-containing fluorescent lamp ballasts. Containerized universal waste was transported by a licensed hauler to an EPA approved incineration facility. All identified PCB sources have been removed from this facility.

Triangle Elementary was demolished in 2009. During demolition of the old school building, all potential PCB containing ballasts and window caulking was removed. Containerized universal

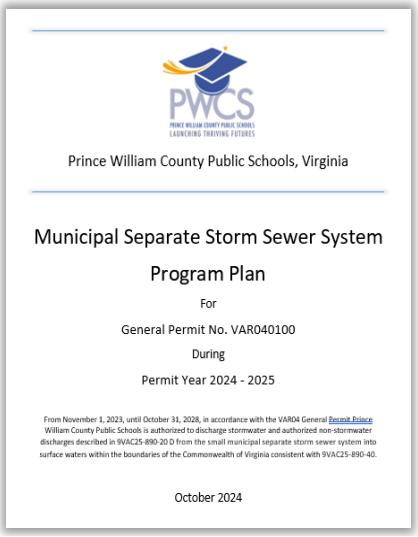
waste was transported by a licensed hauler to an EPA approved incineration facility. All identified PCB sources have been removed from this facility.

Vaughan Elementary was renovated in 2004/2005, including replacement of all potentially PCB-containing fluorescent lamp ballasts. Containerized universal waste was transported by a licensed hauler to an EPA approved incineration facility. All identified PCB sources have been removed from this facility.

Woodbridge Middle was renovated in 2013/2014, including replacement of all potentially PCB-containing fluorescent lamp ballasts. Containerized universal waste was transported by a licensed hauler to an EPA approved incineration facility. All identified PCB sources have been removed from this facility.

4.0 MS4 PROGRAM OVERVIEW

PWCS' MS4 Permit covers stormwater discharges from areas included within the census urbanized areas. PWCS' collective efforts, as described in PWCS' MS4 Program Plan, result in significant reduction of pollutants that may be discharged from its regulated MS4.


Prince William County Public Schools, Virginia

Municipal Separate Storm Sewer System

Program Plan

For

General Permit No. VAR040100

During

Permit Year 2024 - 2025

From November 1, 2023, until October 31, 2028, in accordance with the VAR04 General Permit Prince William County Public Schools is authorized to discharge stormwater and authorized non-stormwater discharges described in 9VAC25-890-20 D from the small municipal separate storm sewer system into surface waters within the boundaries of the Commonwealth of Virginia consistent with 9VAC25-890-40.

October 2024

4.1 Minimum Control Measures

The General Permit requires the Program Plan to include BMPs to address the requirements of six MCMs described in Part I E of the General Permit. The following summary of PWCS' MS4 Program Plan MCMs list laws, programs, and other regulatory mechanisms relied upon by PWCS that are applicable to reducing PCBs.

4.1.1 MCM 1 Public Education and Outreach on Stormwater Impacts

PWCS' MS4 Program includes, by reference, a Public Education and Outreach Program that incorporates educational information about TMDL pollutants of concern. PWCS incorporates education of the effects of human activity on water quality and how we as humans affect it into public science education courses at multiple grade levels. Through the Virginia Standards of Learning (SOLs), students learn the importance of protecting and maintaining our water resources and how it affects their watershed. PWCS implements all SOLs and specifically incorporates water quality issues into grade 4 and 6 earth science courses.

Information concerning legacy sources of PCB contamination have been incorporated into annual employee training programs through Custodial Advisory Training Sessions (CATS). This training addresses identification, risk factors, abatement, and significant sources within the PWCS system. In addition, PWCS provides biennial pollution prevention, illicit discharge identification and prevention, and good housekeeping training to custodial, maintenance, and operations employees.

4.1.2 MCM 2 Public Involvement and Participation

PWCS will post this Action Plan on their stormwater pollution prevention webpage at: https://www.pwcs.edu/departments/facilities/environmental_services/stormwater_management. Availability of the Action Plan will increase awareness of the TMDL with web page visitors.

4.1.3 MCM 3 Illicit Discharge Detection and Elimination

PWCS' MS4 Program includes an IDDE Program with written procedures to detect, identify, and address non-stormwater discharges, including illegal dumping, to the small MS4 with policies and procedures for when and how to use legal authorities. PWCS prohibits non-stormwater discharges into the storm sewer system through language provided within the Prince William County Illicit Discharge Ordinance. PWCS' IDDE Program includes a proactive approach to reduce illicit

discharges with annual outfall screenings to detect and eliminate non-stormwater discharges into the MS4. IDDE BMPs are described in MCM 3 of PWCS' MS4 Program Plan.

4.1.4 MCM 4 Construction Site Stormwater Runoff Control

PWCS' Construction Program includes mechanisms to ensure compliance and enforcement on regulated construction sites that are enforced through the PWC stormwater management (SWM) and Erosion and Sediment Control (ESC) Ordinances that are consistent with the Virginia Erosion and Sediment Control and SWM Laws and Regulations and includes:

- Required plan approval prior to commencement of a regulated land disturbance activity;
- Construction site inspections and enforcement; and
- Certification of post-construction SWM facilities

4.1.5 MCM 6 Good Housekeeping

PWCS' MS4 Program includes a Good Housekeeping and Pollution Prevention Program that includes policies and procedures to ensure that day-to-day operations minimize the exposure of pollutants to rainfall on PWCS-owned and operated properties to the maximum extent practicable. The program is supported with PWCS' Good Housekeeping and Pollution Prevention Manual and training for applicable staff. MCM 6 in the PWCS MS4 Program Plan describes good housekeeping and pollution prevention BMPs. PWCS has also developed site-specific SWPPPs for all high-priority facilities which include the following:

Table 3: High Priority Facilities

High Priority Facility	Address	Location of SWPPP
Central Transportation Center	14855 Dumfries Road Manassas, VA 20112	14800 Joplin Rd. in Building 52 in the Environmental shop
Gar-Field Transportation Center	14000 Smoketown Road Woodbridge, VA 22192	14800 Joplin Rd. in Building 52 in the Environmental shop
Hylton Automotive Shop	14051 Spriggs Road Woodbridge, VA 22193	14800 Joplin Rd. in Building 52 in the Environmental shop
Hylton Transportation Center	14051 Spriggs Road Woodbridge, VA 22193	14800 Joplin Rd. in Building 52 in the Environmental shop
Brentsville Transportation Center	12153 Hooe Road Bristow, VA 20136	14800 Joplin Rd. in Building 52 in the Environmental shop
McCuin Transportation Center	7900 Piney Branch Lane Bristow, VA 20136	14800 Joplin Rd. in Building 52 in the Environmental shop
Independent Hill Complex	14800 Joplin Road Manassas, VA 20012	14800 Joplin Rd. in Building 52 in the Environmental shop
Potomac Transportation Center	3501 Panther Pride Drive Dumfries, VA 22026	14800 Joplin Rd. in Building 52 in the Environmental shop
Osbourn Park Automotive Shop	8909 Euclid Avenue Manassas, VA 20111	14800 Joplin Rd. in Building 52 in the Environmental shop

Woodbridge Transportation Center	3001 Old Bridge Road Woodbridge, VA 22191	14800 Joplin Rd. in Building 52 in the Environmental shop
Western Bus Facility	5728 Wellington Rd Gainesville, VA 20155	14800 Joplin Rd. in Building 52 in the Environmental shop

No new policies and procedures or modifications to existing policies and procedures were identified as necessary to meet the requirements of the special conditions.

5.0 IMPLEMENTATION OF THE STRATEGY TO REDUCE PCB

The implementation of a strategy to reduce PCBs is a critical step in protecting the environment. As part of the MS4 Program, the strategy focuses on identifying, managing, and eliminating sources of PCB contamination across PWCS owned properties and construction sites, including older infrastructure.

5.1 Evaluation of the Results Achieved by the 2018 - 2023 Action Plan

PWCS has evaluated properties for the presence of PCBs. All building have either been renovated, decommissioned, or are planned for demolition in the near future. If new sources of PCBs are discovered, PWCS will notify the DEQ in writing within 30 days of discovery as required by the MS4 GP General Permit.

5.2 Adaptive Management Strategies for the 2023 – 2028 Action Plan

Similar to previous years, PWCS will continue to implement all strategies outlined in Section 6.0, ensuring that all necessary actions to manage and mitigate PCB sources are completed. If at any point during the term of this permit, PWCS identifies a previously unidentified significant source of PCBs within the MS4 service area, PWCS will notify the DEQ in writing. This notification will be made within 30 days of the discovery. The proposed actions in Section 6.0 below represent implementation to the maximum extent practicable.

6.0 SCHEDULE

PWCS will implement the MS4 Program components described in Section 4 to reduce the potential of PCB discharge to surface waters to the maximum extent practicable. The method of assessment is implemented through the annual reporting process with the review of the effectiveness of each MS4 Program Plan BMP. Table 4 provides a schedule of anticipated actions recommended or planned during the implementation of this Action Plan.

Table 4: Schedule of Anticipated Actions Planned for Implementation of PCB Reductions

Strategies	Method	Timeframe	Metric
Continued Implementation of Training	Training	Completed and ongoing	Training Records
Site-specific SWPPPs for High-Priority Facilities	SWPPP developed and implemented	Completed and ongoing	SWPPP inspections conducted annually
MS4 Program MCMs	MCMs 1 - 4 and 6 and PWC Ordinances developed and implemented	Completed and ongoing	Annual reporting
New discoveries previously unidentified significant sources of PCBs reported, if found	Notification to DEQ in writing within 30 days of discovery, if found	Ongoing	Letter, if applicable