

Fairfax County 2023 MS4 Program Plan and Annual Report

Appendix P9

Standard Operating Procedures for Industrial and High Risk Runoff (IHRR) Program MS4 Point of Connection and Facility Inspections

VSMP Permit Number VA0088587
9-29-2023



Department of Public Works and Environmental Services
POLICIES AND PROCEDURES

Memorandum No.: SWPD14-01

**SUBJECT: Standard Operating Procedures for Industrial and High-Risk Runoff (IHRR)
Program MS4 Point-of-Connection and Facility Inspections**

Effective: 2/2/2015

Revised: 5/24/2022

Approval:

A handwritten signature in black ink, appearing to be "J. B.", written over a horizontal line.

I. Purpose

To establish the guidelines by which Stormwater Planning Division (SWPD) Stormwater Pollution Inspections Section (SPI) inspects industrial and high-risk runoff (IHRR) facility outfalls at the point(s) of connection to the Fairfax County municipal separate storm sewer system (MS4).

**II. Standard Operating Procedures for Industrial and High-Risk Runoff (IHRR)
Program MS4 Point-of-Connection and Facility Inspections**

A. Introduction

Section I.B.2.g of Fairfax County's MS4 permit requires the County to "implement a program to identify and control pollutants in storm water discharges to the MS4 from IHRR facilities (municipal landfills; other treatment, storage, or disposal facilities; facilities that are subject to EPCRA Title III, Section 313) and any other industrial or commercial discharges the permittee determines may contribute a significant pollutant loading to the MS4."

Chapter 124 of the Code of Fairfax County, Virginia ("Stormwater Management Ordinance"), Section 124-9-4 requires the Director of the Department of Public Works and Environmental Services to develop a program for routine inspection of industrial and commercial properties that present a high risk of discharging non-stormwater substances that may result in a significant pollutant load entering the County MS4.

These inspection guidelines are intended for the SPI code specialists and ecologists tasked with conducting IHRR inspections.

1. Facilities

The guidelines in this procedural memorandum cover inspections at facilities identified by Fairfax County as IHRR facilities. This means any inspection required under Section I.B.2.g of the County's MS4 permit, including (1) outfalls of facilities with Virginia Pollutant Discharge Elimination System (VPDES) industrial stormwater permits at the point of connection to the County MS4 (I.B.2.g.2), (2) any non-VPDES permitted industrial facility from which the permittee has evidence that a significant pollutant load is entering the County MS4 system (I.B.2.g.4), and (3) any industrial and/or commercial stormwater dischargers not regulated under the Virginia State Water Control Law that it determines may be contributing a significant pollutant loading to the County MS4 (I.B.2.g.6).

To identify such facilities, the County developed the following definitions as guidance:

- **High-Risk Facility** – any commercial or industrial facility that has caused a discharge that has contributed a significant pollutant loading to the MS4 on a recurring basis; or any discharger identified in accordance with Section I.B.2.g.6 of the MS4 permit.
- **Industrial Facility** (as identified within the permit) – a municipal landfill; other treatment, storage, or disposal facility for municipal waste; a hazardous waste treatment, storage, disposal and recovery facility; a facility that is subject to EPCRA Title III, Section 313; a VPDES industrial stormwater permitted facility; and any other facility with a "storm water

discharge associated with industrial activity,” as the term is defined in 40 CFR 122.26(b)(14), to the MS4.

- **Recurring Basis** – a discharge that has occurred at least three times in a five-year period.
- **Significant Pollutant Load** – a discharge that contributes pollutants sufficient to cause or exacerbate the deterioration of receiving water quality or aquatic life. [Examples are provided in II.A.2 below.]

2. Evidence of Significant Pollutant Loads

The County will apply the following definitions as guidance:

- **Evidence** – something that tends to prove or disprove the existence of an alleged fact.
 - Examples of evidence of stormwater pollution may include but are not limited to: the presence of pollutants in flow samples that exceed water quality screening thresholds, color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen, grease, deposits and stains, abnormal vegetative growth, and outfall damage such as cracking or corrosion.
- **Violation** – any unauthorized discharge into the County’s MS4. These violations may include, but are not limited to:
 - discharges referenced in the Stormwater Management Ordinance
 - discharges not authorized by the County’s MS4 Permit
 - discharges in exceedance of the State of Virginia Water Quality Standards
 - discharges in exceedance of VPDES effluent limitations
 - Examples of unauthorized discharges include, but are not limited to:
 - Chlorinated water (non-potable)
 - Improper disposal of grass clipping, leaf litter and pet wastes
 - Non-permitted commercial vehicle and equipment washing
 - Non-permitted cooling tower discharges
 - Process water (such as stone cutting wastes, plating bath wastewater, etc.)
 - Restaurant wastes such as cooking oil/grease or floor washing water
 - Vehicle motor oil, including water from service bay cleanings
 - Sanitary waste

In many instances, visual cues and/or odors are enough evidence of illicit discharges, so Stormwater inspectors may begin tracking evidence to a pollutant source or request that a discharge be stopped without sampling flow. If flow is present at the point of connection to the County MS4 but the source is not evident based on visual cues or odors, inspectors may collect and screen samples for the indicators of potential non-stormwater discharges most appropriate for the type of facility being inspected. The suite of indicators selected by Fairfax County are similar to those recognized nationally by many other stormwater programs and entities such as EPA and the Center for Watershed Protection. Additional details about the screening procedures are described in the Screening Procedures for Illicit Discharges, Procedural Memorandum SWPD14-04.

Generally, inspectors will try to track evidence to a source or require responsible parties to identify the source of pollutants. Under certain scenarios, inspectors may be restricted from tracking (e.g., at restricted private property or a VPDES-permitted facility under the jurisdiction of Department of Environmental Quality (DEQ)).

The County’s MS4 permit states that “the permittee shall coordinate with [DEQ] to report any non-VPDES permitted industrial facility from which the permittee has evidence that a significant

pollutant load is entering the MS4 system.” Evidence of significant pollutant loads are reported to DEQ in accordance with sections II.D.10 and II.G of this memorandum.

3. Inspection Prioritization

Historically, Stormwater inspectors divided and prioritized IHRR inspection efforts geographically according to County magisterial districts. The inspection program will continue to consider magisterial districts for the purpose of balancing inspector workloads. Moving forward, inspection prioritization will be based on the types of industrial activity, as determined by Standard Industrial Classification (SIC) codes, that are considered at higher risk than others of discharging pollutants and industrial activities that are identified in Total Maximum Daily Load (TMDL) action planning.

The County has implemented a modified prioritization scheme for the second inspection cycle (commenced in FY 2020) that considers IHRR facilities in this order:

- Priority 0 – A grouping of facilities that will not be inspected in association with the IHRR inspection program, including:
 - PCB - DEQ 2016 (PCBO-16) – A facility with a SIC code recommended for further study in the research paper, "The Relationship between Polychlorinated Biphenyls (PCBs), VPDES Wastewater/Stormwater Facilities, Stormwater Industrial General Permitted Facilities (ISWGPs), and the Standard Industrial Classification System (SIC)" (VDEQ, 2016).
 - Zoning – Facility is located in an area of the County that is not zoned for industrial or commercial purposes.
 - Not IHRR – The facility has been visited and/or inspected and determined not to meet the criteria of IHRR based on the inspector’s best professional judgement (e.g., only indoor activities, large commercial buildings with the business on above ground floors, etc.)
 - IHRR in county out of MS4 area – The facility meets IHRR criteria but is not within the County MS4 service area (i.e., no stormwater infrastructure).
 - Duplicate record – The facility is already on the IHRR list
 - Not found at this address – The facility on the IHRR list has moved, closed, or disbanded.
 - Other MS4 jurisdiction – The facility meets IHRR criteria but is with another jurisdiction within the County (e.g., Town of Herndon, Town of Vienna, City of Falls Church, Town of Clifton, City of Alexandria)
- Priority 1–Targeted industrial activities including the following:
 - Major Automotive - A grouping of industries at higher risk of discharging pollutants as identified by Fairfax County based on MS4 permit language and best professional judgement.
 - High Risk (HR) - A grouping of industries at higher risk of discharging pollutants as identified by Fairfax County based on best professional judgement.
 - PCB - DEQ 2009 (PCBO-09) – A facility with primary or secondary SIC codes that are subject to the monitoring guidance, "TMDL Guidance Memo No. 09-2001. Guidance for monitoring of point sources for TMDL development using low-level PCB method 1668" (DEQ, 2009) because, by DEQ's reasoning, specific types of

industrial or commercial operations are more likely than others to have a discharge that includes PCBs.

- Priority 2—After assigning priority 1 facilities, all remaining facilities will be assigned priority 2 including the following industrial and/or commercial categories:
 - EPCRA Sec 313 (313-C) – A facility with industrial classification codes covered by EPCRA Section 313 for reporting under Toxics Release Inventory program.
 - EPCRA Sec 313 (313-R) – A facility with industrial classification codes covered by EPCRA Section 313 that reported a release within the past three years.
 - Industrial Stormwater GP (IS) – A facility with SIC codes for industrial activities covered by the VPDES industrial stormwater (IS) general permit.
 - Study (ST) - A grouping of industries identified by Fairfax County for further study based best professional judgement (inspection results).
 - Windshield (WS) - Facilities observed to conduct IHRR operations that were not in the Data Axle database SIC Code search.
 - VPDES - Facilities registered with VADEQ VDPES permit.

The prioritization ranking will be reflected on the County's industrial discharger list (in the Priority field).

This prioritization is intended to be applied broadly, but not force inspectors to schedule individual IHRR inspections in a specific order. Inspectors will give priority to inspecting Priority 1 facilities but may couple those inspections with Priority 2 inspections, when reasonable for efficiency. Within the broader prioritization framework, inspectors should have flexibility. The program may adjust inspection priority over time based on historical discharges, local water quality impairments, industrial category, or other methods such as results of previous inspections, DMR review, known spills, complaints, or findings from other County programs such as dry or wet weather screening.

At a minimum, the County will inspect VPDES industrial stormwater permitted outfalls connected to its MS4 once every five years consistent with the MS4 permit requirement.

4. Organization of this Memorandum

Major sections of this memorandum describe the three main phases of an inspection, namely pre-inspection, inspection (MS4 point of connection and facility) and post-inspection. A flowchart of the inspection process is provided Figure 1. This memorandum also describes referrals to DEQ and basic safety precautions.

B. Personal Safety Prerequisites

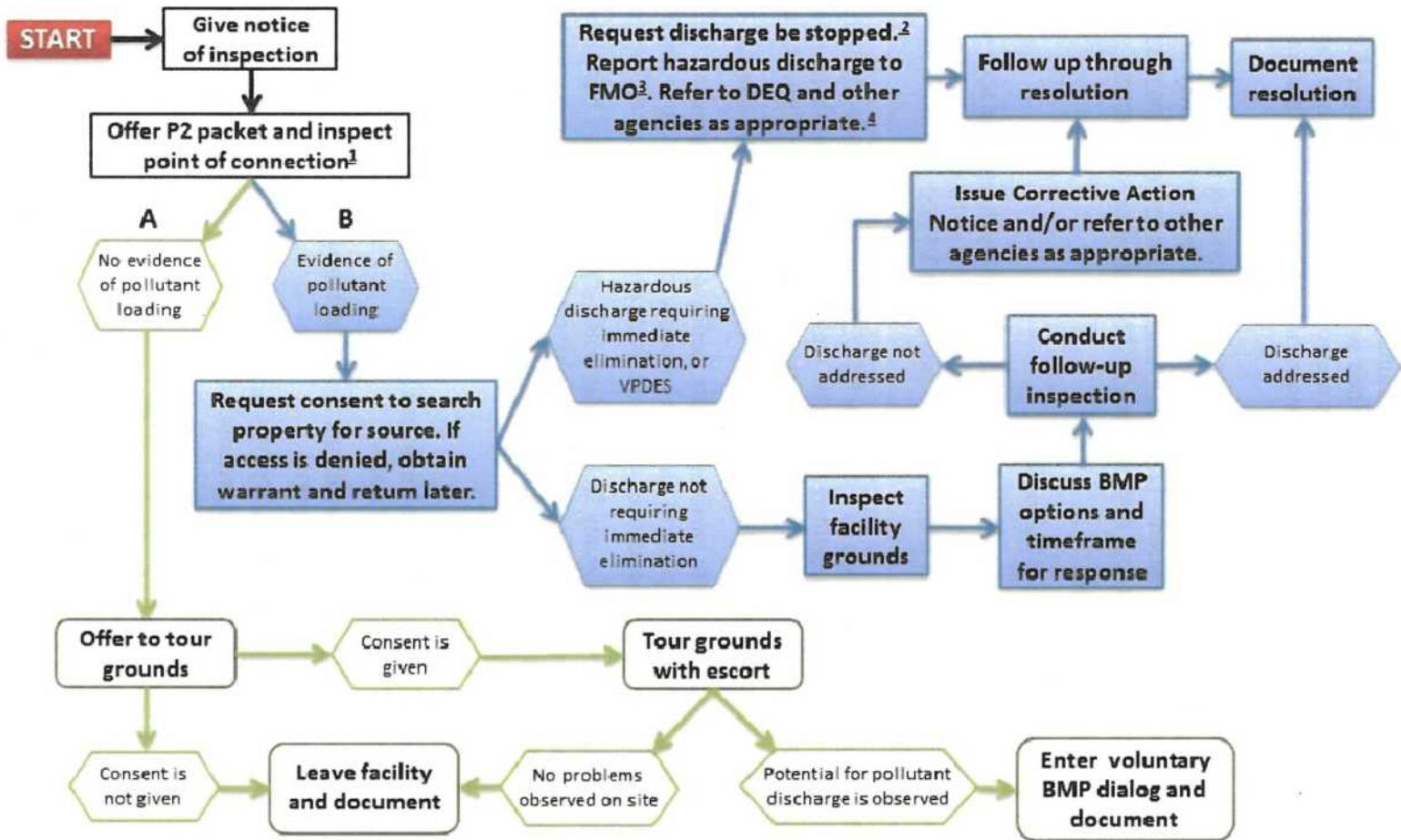
1. Confined space awareness training, including refreshers, is required at the frequency specified by the division director to participate in IHRR point-of-connection and facility inspections. During an actual inspection, inspectors should not break the plane of a confined space with any part of their body at any time as per the SWPD Confined Space Policy (contained within Appendix A).
2. Personal protective equipment (PPE) must be worn as appropriate during inspections, which must include steel toed boots and safety vest and may include hard hats, safety glasses, gloves, and waterproof clothing (waders), breathing face masks, as needed. All vehicles must be equipped with a first aid kit.

3. Inspectors should copy their supervisor and branch chief on email correspondence when they send lists of facilities to division administrative staff for letter preparation. On the day of inspection, inspectors should notify their supervisor or acting supervisor and administrative staff by email when they are going into the field, when they return. Inspectors should have informed their supervisor of how to reach them in case of emergency generally
4. If there is any indication before dispatch or upon arriving at the site that hazardous material may be present, contact the Fire Marshal's Office (FMO) immediately to determine if hazardous material is present. Do not proceed with the investigation until the FMO has verified that any hazardous material the FMO screens for is not present.

C. Pre-inspection Activities

1. Scheduling a Facility for Inspection
 - a. Begin by selecting facilities from the IHRR facility database in accordance with the inspection prioritization. The selected facilities may be added to a list for mail merge. Note: Separate letter templates were created for VPDES-permitted and non-permitted facilities.
 - b. Check the registration statement for VPDES permitted facilities to determine the location(s) of the permitted outfall(s). Only the permitted outfall(s) connected to the County MS4 will be inspected; permitted direct discharges will not be inspected.
 - c. Send the "Stormwater Inspection Letter" (Appendix B) to the selected IHRR facilities.
 - d. Optional: Attempt to email or call the facility owners or designated facility representatives to confirm the point-of-connection inspection one week prior to the inspection date. Request an escort if private property access will be needed.
 - e. If the facility is a County facility, also notify the MS4 County Facilities Program Coordinator because County facilities have additional requirements under the MS4 permit. An MS4 County Facilities team member may request to be onsite during the inspection.
2. Preparing for an Inspection
 - a. Optional: Prepare a facility map using the template created by the GIS analyst (Appendix C) for printed maps.
 - b. Review and evaluate all available facility information including any previous stormwater inspection reports.
 - c. Where applicable, review VPDES permits, including parameter-specific effluent limitations, and discharge monitoring reports (DMRs) from the past two years, along with any violations or complaints.

IHRR Inspection Program



Notes:

- ¹ The point of connection is where the facility's discharge enters Fairfax County's MS4.
- ² SWPD may initiate enforcement of non-VPDES facilities. This could include issuance of a Corrective Action Notice. It could also include coordination with the County Attorney's Office.
- ³ In all emergency situations involving discharge of hazardous materials, call 911 immediately.
- ⁴ Any facility with a VPDES permit shall be reported to DEQ when evidence of significant pollutant loading to state waters is found. Notify the MS4 County Facilities Coordinator of significant pollutant loading involving any county facility.

Figure 1: IHRR Program Inspection Process

- d. Gather necessary inspection equipment and ensure that it is in the vehicle and in working order. Equipment includes:
 - i. Personal protective equipment (e.g., hard hat, safety vest, steel-toe boots)
 - ii. Inspector screening kits (with calibrated meters)
 - iii. Sample tote bag including collection tools and bottles
 - iv. Manhole hook
 - v. Camera with charged batteries (optional)
 - vi. Phone
 - vii. Mobile computing equipment
 - viii. First aid kit
 - ix. Hazardous waste containers

D. MS4 Point-of-Connection Inspection

An overview flowchart of the entire inspection process is provided in Figure 1. It is required that IHRR inspections begin at the point of connection to Fairfax County's MS4.

1. Ensure that all steps in Section II.C are complete prior to starting an inspection.
2. Inspections may be conducted under dry or wet weather conditions. On the day of the inspection, check National Weather Service (NWS) or other weather website to determine if conditions are dry weather or wet weather. Dry weather conditions are met whenever there is < 0.1 inches of rain within 48 hours.
3. Upon arrival, inform the facility contact that you are present onsite. (Refer to Confidential Memorandum 121776 for procedures for conducting investigations on private property.)
4. Provide either a complete pollution prevention (P2) packet, or industry-appropriate insert(s) from the packet. If the facility was identified by a SIC code associated with PCBs, provide educational material.
5. Start the site inspection in the IHRR mobile application.
6. Locate the point(s) of connection identified in the IHRR mobile application.
 - a. If the point of connection is not accessible, go to the next stormwater manhole located upstream in the storm drainage system.
 - b. Staff may remove storm drain manhole covers and use powered devices to collect water samples, if present.
 - c. Complete a Structure Inspection in the IHRR mobile application for each structure inspected.
7. If there is flow present, sample and characterize the flow as described in the Screening Procedures for Illicit Discharges, Procedural Memorandum SWPD14-04. [Note: Visual evidence of an illicit discharge can be used to request source identification.] Record analytical results in the Structure Inspection IHRR mobile application. (Samples can be collected and screened under wet weather conditions.)
8. Normally, water quality screening parameters are to be tested in the field. Handle any water samples that require laboratory analysis as follows:

- a. Call the Noman M. Cole Jr. Pollution Control Plan for instructions on how to collect samples for analysis of unique parameters and to inform them samples will be delivered.
 - b. Upon delivery to the laboratory, complete appropriate chain of custody forms. If necessary, record deviations from the standard procedures on the chain of custody forms. (Some examples of deviations include using a nonstandard container to collect the sample, not being able to place on ice a sample that needs refrigeration, going beyond the ideal holding time, etc.)
 - c. Indicate in the IHRR mobile application (Structure Inspection portion) the name of the laboratory where samples will be analyzed.
9. For VPDES-permitted facilities, inspect only the permitted outfalls connected to the County MS4 for evidence of significant pollutant loading.¹ If a pollutant and/or pollutant source can be readily identified visually or by odor, it is not necessary to collect a flow sample for analysis. If there is flow at the point of connection to the County MS4 and the source cannot be readily identified through visual inspection or by odor, a sample may be collected for screening. Notify DEQ following the procedures in Section II.G if significant pollutant loads are found.
10. Collect photographs. Examples of items to photograph are stormwater infrastructure, visible evidence of pollutants and possible pollutant sources at the site. If necessary, photograph stormwater features in such a way that they can be located again for reinspection. Note: Photos are associated with the facility or individual structures in the IHRR mobile application.
- a. When possible, photograph unique landmarks such as building fronts and signage that will help to identify the location.
 - b. Use date stamped photography, when possible. If the photo is too large to upload to the mobile application, ensure that the photograph has proper date and time stamps in the file details during the QC check.
11. If no evidence of significant pollutant loading is found, the required IHRR inspection is complete.
- a. Hit send (large arrow button) in the IHRR mobile application to save all information related to the point-of-connection inspection from the application to the GIS portal.
 - b. Inform the facility representative on site of any preliminary findings.
 - c. Offer to tour a non-VPDES permitted facility for a voluntary educational site evaluation. Explain the voluntary site evaluation process.
 - i. If the facility declines the voluntary site evaluation, note this in the "Permission Given" field in the IHRR mobile application and end the facility visit.
 - ii. If the facility gives permission for the voluntary site evaluation:
 1. In the site inspection portion of the IHRR inspection mobile application check "Yes" next to *Permission Given* to indicate that the evaluation is voluntary and not a required site inspection to identify the source of a significant pollutant load.

¹ Do not inspect outfalls with direct discharges to state waters. Permitted direct discharges to state waters are under the regulatory authority of DEQ.

2. While educating the facility contact(s) about the elements included in the voluntary site evaluation, assess outdoor activities that could potentially contribute pollutants to the County's MS4. Discuss best management practices to help prevent or address pollutant discharges from the site.

12. If evidence of significant pollutant loading is found:
 - a. Inform the facility representative of the finding of illicit discharge of a significant pollutant load at the point of connection.
 - b. If the pollutant is suspected to be petroleum or hazardous, contact the FMO immediately to coordinate further response.
 - c. If the facility is VPDES permitted from DEQ, refer the facility to DEQ following the procedures in Section II.G. [Note: The facility contact may request assistance with identifying the source. The inspector(s) onsite may offer limited assistance to permitted facilities and facilities regulated by DEQ. The permittee or owner/operator of the facility is ultimately responsible for finding and eliminating the source of the significant pollutant load.]
 - d. Promptly notify the MS4 County Facilities Program Coordinator when evidence of significant pollutant loading is found at a County facility.
 - e. If neither 11.b nor 11.c above is met, continue with the facility inspection procedures in Section II.E below for non-VPDES, and non-hazardous dischargers.

E. Identification of Pollutant Sources

1. Introduce, or reintroduce, yourself to the facility representative.
 - a. For non-VPDES, and non-hazardous dischargers, request entry to the site for purposes of identifying the pollutant source. [If the facility representative(s) refuse to permit entry for the site inspection (or later refuse to continue the inspection), suspend the inspection and leave the property. Contact the County Attorney's Office immediately for assistance with obtaining an administrative warrant. Return to the property to resume the facility inspection only after obtaining the necessary legal documents.]
 - b. Explain the site inspection process.
 - c. Ask for a brief overview of the facility operations and determine what, if any, personal protective equipment (PPE) will be needed while onsite.
2. Once onsite, follow the procedures described in the Screening Procedures for Illicit Discharges (Procedural Memorandum SWPD14-04), as appropriate, to trace the pollutant through the stormwater infrastructure to its source. Document and photograph, where possible, in the Structure Inspection of the IHRR mobile application each stormwater feature that is checked for evidence of significant pollutant loading. In some instances, the source of the pollutant(s) may be immediately obvious. Use of best professional judgment is allowed in identifying the pollutant source, provided that the inspector documents the reasons for deviating from the formal source tracking procedure.
3. While onsite, conduct the facility inspection and complete the Site Inspection in the IHRR mobile application. It may be helpful to start by walking the perimeter of the site to observe storm drainage infrastructure and sheet flow drainage areas.

4. If the pollutant source(s) are identified at the time of inspection, inform the facility representative of the findings and the actions the facility representatives are required to take. Inspectors may request immediate discontinuation of the discharge.
5. Issue Corrective Action Notices and Notices of Violation as appropriate. Refer to the separate enforcement plan, Procedural Memorandum SWPD14-03, for more details.
6. Inform the facility representative of any referrals that will be made to other responsible local or state agencies.
7. Contact all appropriate local or state agencies where immediate action is required.
 - a. Call the Fairfax County FMO immediately to report releases of hazardous materials or other chemicals that pose an imminent threat to the environment.
 - b. Also notify DEQ immediately when the discharge of hazardous materials or a significant pollutant load enters or has the potential to enter state waters and/or if there is a significant ecological impact such as a fish kill.
 - c. For non-hazardous, non-emergency issues that may involve other agencies, refer to the latest Stormwater “Who to Call” List for the appropriate contact(s).

Note that inspections of facilities for which the Stormwater inspector has obtained evidence of significant pollutant loading may be carried out in conjunction with other permittee programs. The facility and appropriate agencies will be informed according to steps 6 and 7 above.

F. Requests for Inspection Reports

Inspection reports are subject to Freedom of Information Act (FOIA) requests, meaning anyone who requests a copy of a report is entitled to receive it. Entities that have been inspected (and others) have rights to obtain the documents under FOIA. FOIA requests may be verbal or written. The requester does not have to indicate that the request is a FOIA; a request for any County document is a FOIA automatically. With the assistance of a DPWES public information officer (PIO), requests should be appropriately documented as FOIA requests. FOIA law requires a response within five business days. If that is not possible, the DPWES PIO will ask for an extension of seven business days.

A caveat: Inspectors may offer a copy of an inspection report to the inspected entities without a request. Inspection reports provided in this way do not need to be tracked as FOIA requests.

Generally, fulfillment of FOIA requests will follow these steps:

1. A customer/person requests a copy of the inspection report.
2. The receiving inspector acknowledges the request and asks the requester to follow up with a request in writing (e.g., by email, handwritten note, or using the FOIA form). This will help to clarify what the requester is asking for and provide supporting documentation as the request is being fulfilled.
 - a. Provide the requester with a hard copy of the FOIA form (Appendix E). This is the preferred written document. Following guidance provided by the DPWES PIO, point out to the requester which items are necessary to fill in. Inform the requester that the form may be returned by mail, email, or in person.
 - b. Alternatively, the requester may send an email, write a letter containing the request, or telephone the inspector.

- c. Keep in mind that that FOIA request begins when the requester asks for documents. The requester might not follow up with a written request and is not required to fill out the form to receive the document; the request must be fulfilled unless the request was not clear.
3. Immediately inform the DPWES PIO of any verbal requests for inspection documents.
4. Forward any FOIA forms or other written requests to the DPWES PIO.
5. Provide the requested documents to the DPWES PIO.
6. The DPWES PIO will respond to the FOIA request and document fulfillment of the request and keep the FOIA tracker updated.

G. Post-inspection Activities

1. Perform quality control check in the IHRR desktop application. Photograph or scan any hard copy documents and save them to the corresponding facility folder on the network.
2. Inform relevant Fairfax County agencies of significant pollutant discharges that require responses from multiple Fairfax County agencies and enhanced coordination.
3. Note in the MS4 commenting application if it is unclear whether an outfall is an MS4 outfall and/or it is unclear whether a facility is within the MS4 service area. Inform the Stormwater GIS Section of any stormwater features that were missing or not properly located on the map for further investigation.
4. Where corrective action is needed and SPI has the lead enforcement responsibility, prepare the Corrective Action Notice or Notice of Violation according to the SWPD's enforcement guidelines, Procedural Memorandum SWPD14-03. When a discharge is referred to another Fairfax County agency, follow-up with that agency within 30 days for an update on the compliance status. Document the contact in the IHRR desktop application. Note when and how the discharge was addressed once compliance is achieved.
5. Schedule and conduct follow up site inspections as needed.

H. Referral to DEQ for Further Action

1. The MS4 permit requires that the County refer the following facilities to DEQ for compliance review under the Virginia State Water Control Law:
 - a. Facilities and operations having non-stormwater discharges that do not have coverage under an existing VPDES permit.
 - b. Facilities and operations identified under 40 CFR §122.26(b)(14) with manufacturing, processing, or raw materials storage outside that do not have coverage under an existing VPDES industrial stormwater permit.
 - c. Any VPDES industrial stormwater-permitted facility where there is evidence of significant pollutant loadings to the MS4.
2. Upon completion of a point of connection, permitted outfall or facility inspection, the inspector should determine whether the facility meets any of the three criteria listed above. If urgent action is necessary, notify DEQ by phone and/or email immediately (no later than 24 hours after discovering the discharge). For both urgent and non-urgent referrals, mail a formal "Letter to DEQ-Compliance Review Referral" (Appendix F) to DEQ's Northern Regional Office. Maintain a hard copy or scanned copy of the signed letter for County records.

3. Attempt to contact DEQ at least once within 30 days for an update on the status of DEQ's investigation. Document the contact in the IHRR database. If known, note in the database when and how the problem discharge was addressed by DEQ and the facility.

I. Administrator of the SOP

This SOP document is administered by the SPI section chief within SWPD. For more information about this document, contact SWPD at (703) 324-5500.

APPENDICES

Appendix A: Stormwater Planning Division Confined Space Policy

Appendix B: Stormwater Inspection Letter

Appendix C: Printed Map Template

Appendix D: IHRR Inspection Report (example)

Appendix E: FOIA Request Form

Appendix F: Compliance Review Letter to DEQ

APPENDIX A: Stormwater Planning Division Confined Space Policy



County of Fairfax, Virginia

To protect and enrich the quality of life for the people, neighborhoods and diverse communities of Fairfax County

DATE: November 14, 2019
TO: Stormwater Planning Division
FROM: Craig Carinci, Director
Stormwater Planning Division
SUBJECT: Stormwater Planning Division Confined Space Policy Acknowledgement

It is the current the policy of this division that Stormwater Planning Staff shall not enter confined spaces regardless of the space being non-permit vs. permit required. In the event that entry is required, staff should utilize fully trained/certified attendants and entrants from Maintenance and Stormwater Management Division or approved contractors to enter the space. Below are additional Stormwater Planning Division (SWPD) policies regarding employee responsibilities pertaining to confined space.

- Entry is defined as any part of the body that breaks the plane of an opening to any confined space.
- SWPD staff may visually inspect from a safe location outside of confined spaces.
- SWPD staff shall not remove or open access panels to any confined space, such as but not limited to, manhole covers, doors, pipe end covers, etc without approval from the SWPD Director.
- Breaking the plane of an opening to a confined space with an electronic powered device is not allowed without written approval from the SWPD Director.
- SWPD staff shall attend documented Non-Entry Procedures for Confined Spaces training that has been approved by the Director.
- All SWPD employees must attend Confined Space Awareness Training as detailed in the Current Safety Manual.
- Refresher training will be conducted annually to ensure proficiency or: when changes in confined space operations present a hazard that has not been addressed in prior training, deviations from confined space procedures are discovered or inadequacies and/or deficiencies in staff knowledge is identified.

I have read and understand the policies identified above.

Print Name

Date

Signature

Department of Public Works and Environmental Services
Stormwater Planning Division
12000 Government Center Parkway, Suite 449
Fairfax, VA 22035-0052
Phone: 703-324-5500, TTY 711, Fax: 703-802-5955
www.fairfaxcounty.gov/publicworks



APPENDIX B: Stormwater Inspection Letter



County of Fairfax, Virginia

To protect and enrich the quality of life for the people, neighborhoods and diverse communities of Fairfax County

DATE

«Recipients_Name»
«Recipients_Address»
«CITY_STATE» «ZIP»

Reference: Stormwater Inspection of «Recipients_Name»

Dear Sir or Madam:

Fairfax County operates a public storm drainage system called a Municipal Separate Storm Sewer System (MS4) to collect stormwater that runs off the land and transport it to waterways. Fairfax County's MS4 permit requires the County to prevent the discharge of pollutants into its storm drainage system. This includes pollutant sources such as sanitary sewer connections and wash water from everyday cleaning and maintenance activities. In addition to being harmful to the environment, Chapter 124 of the Code of Fairfax County, Virginia makes it illegal to dump or pour anything other than surface or subsurface water into the gutter, down a storm drain or into a stream.

The MS4 permit requires the County to identify and control pollutants in stormwater discharges from industrial and commercial facilities that are most at risk of discharging a significant amount of pollutants to the storm drain system. Therefore, Fairfax County has developed an industrial and high risk runoff (IHRR) inspection program. The County will be conducting inspections of industrial and commercial properties and working with businesses to prevent stormwater pollution. County representatives plan to visit your business mentioned in the reference line above during the weeks of **DATE** for the purpose of conducting a stormwater inspection.

Good housekeeping practices and on-site pollution control are some of the most effective ways to prevent water pollution. Fairfax County considers you a valued partner in its effort to ensure a healthy environment. Please contact me at 703-324-5500 with any questions or concerns you may have. We appreciate your cooperation and ongoing assistance to protect the waters of Fairfax County as well as the Chesapeake Bay.

Sincerely,

Shannon Curtis, Chief
Watershed Assessment Branch

cc: **NAME**, Code Specialist II, Watershed Assessment Branch, Stormwater Planning Division,
Department of Public Works and Environmental Services

Department of Public Works and Environmental Services
Stormwater Planning Division
12000 Government Center Parkway, Suite 449
Fairfax, VA 22035-0052
Phone: 703-324-5500, TTY: 711, Fax: 703-802-5955
www.fairfaxcounty.gov

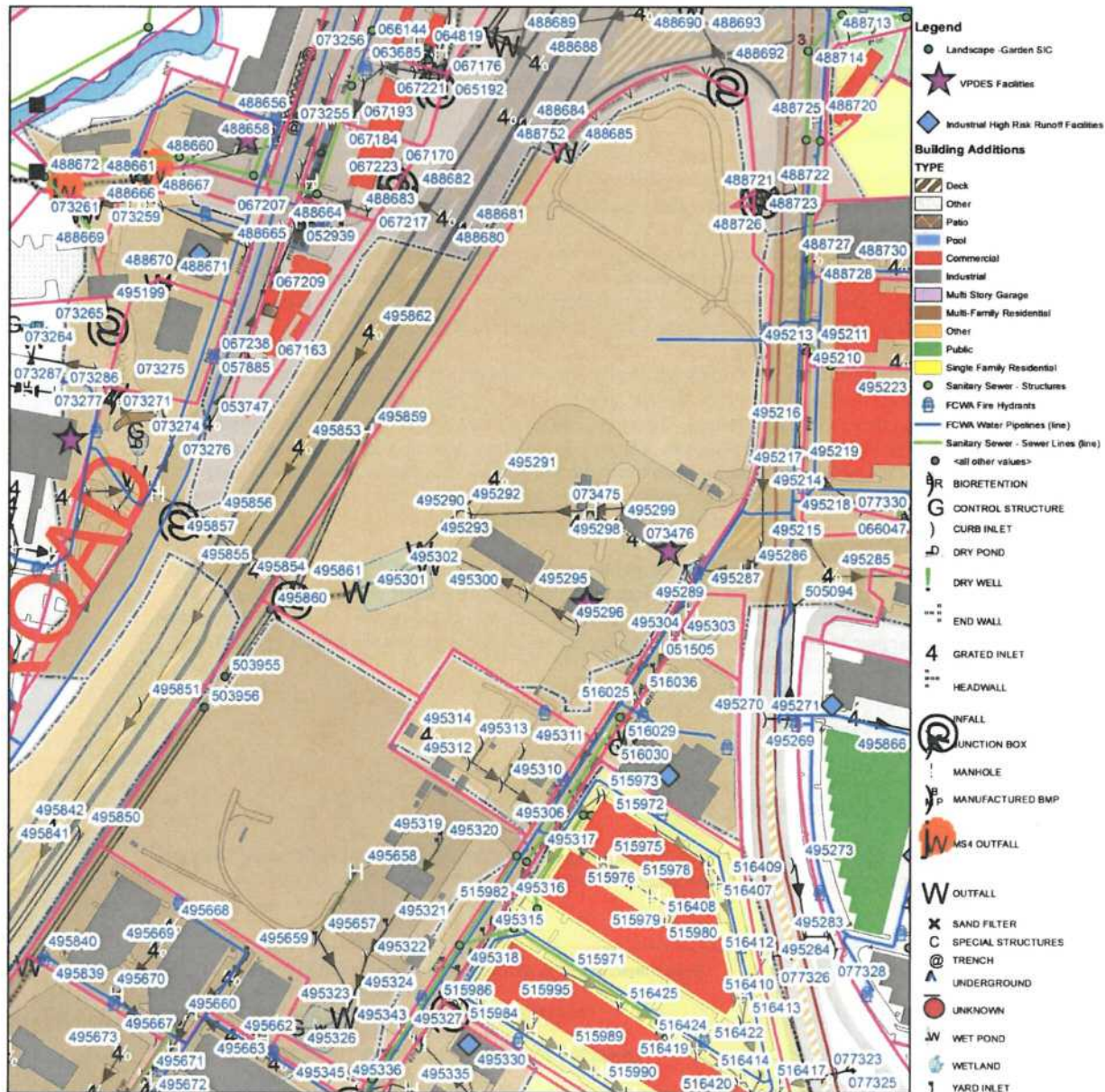


APPENDIX C: Printed Map Template

Department of Public Works and Environmental Services
 Stormwater Planning Division
 12000 Government Center Parkway, Suite 449
 Fairfax, VA 22035-0052
 Phone: 703-324-5500, TTY: 711, Fax: 703-802-5955
 www.fairfaxcounty.gov



ID	Location	Watershed
VA0001945	Kinder Morgan SE Terminal-Newington 8200 Terminal Road Newington, VA 22122	ACCOTINK CREEK



APPENDIX D: IHRR Inspection Report (example)

Revision #2, November 2019

IHRR Inspection for Facilities in MS4

Inspector:	Date:	Time:
Facility Name:	Building Description: <input type="checkbox"/> Industrial Park <input type="checkbox"/> Strip Mall <input type="checkbox"/> Multi-Story Commercial Building <input type="checkbox"/> Stand Alone	
Site ID (FIPID):	Address:	Suite:
Facility Closed: <input type="checkbox"/>		
Facility Name Change: <input type="checkbox"/>		
Watershed:	City:	Zip:
BOS District:		
Facility Rep./Phone/Email:		
Owner/Phone/Email:		
SIC Code:	Facility Activity:	

Stormwater Drainage Structure Inspection		Weather Conditions: Wet/Dry (48 hrs. no rain > 0.1")				
STMN						
MS4 Connection?	Yes/No					
Maintenance Responsibility	FFX VDOT Private					
Discharges to?	River/Stream/Lake Pond/Detention Wetland/Woods/Ditch					
Flow Rate	Light Substantial No Flow					
Storm Drain Marked?	Previously Marked Marked during Inspection No					
Sample Field Test Results						
Collection Time	Analysis Time	Surface Water Quality Standards Limits				
Water Temp (°C)		≥32				
pH		<6 or >9				
Specific Conductivity (µS/cm³)		>1,000				
Copper (mg/l)		>0.5				
Phenol (mg/l)		>0.4				
Detergents (mg/l)		>0.25				
Fluoride (mg/l)		>0.5				
Ammonia (2°) (mg/l)		>0.3				
Chlorine (2°) (mg/l)		>0.4				
Lab Samples Collected? <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, indicate sample type and laboratory						

FACILITY INSPECTION

Required: Yes No Permission Given: Yes No NA

Were all storm drainage systems inspected?								<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
List on-site Structural BMPs (i.e. dry/wet ponds, OWS, vegetated swales). Indicate condition.									
Any manufacturing, processing, or raw material storage outside w/ potential to impact storm?				Yes/No		If Yes, briefly describe:			
Any aboveground, outdoor storage of materials? Include stockpiles/chemicals/hazardous materials				Yes/No		If no, skip to Vehicle Operations			
List container type, materials, and amounts			Are materials next to a storm drain?	Condition of Container (if applicable)	Containers appropriately sealed?	Containers appropriately labeled?	Secondary containment provided?	Signs of leaks or stains	Comments
			Y/N		Y/N/NA	Y/N/NA	Y/N	Y/N	
			Y/N		Y/N/NA	Y/N/NA	Y/N	Y/N	
			Y/N		Y/N/NA	Y/N/NA	Y/N	Y/N	
Can vehicle operations impact storm drains?				Yes/No		If no, skip to Parking Lot/Property			
A. Can loading/unloading activities potentially discharge pollutants to the storm drain?				Yes/No/NA					
B. Are fueling operations present? If present list runoff control measures if any.				Yes/No/NA					
C. Are vehicles repaired outside?				Yes/No/NA					
D. Does vehicle washing occur that could go to a storm drain?				Yes/No/NA					
Parking Lot/Property									
A. Are they free of litter?				Yes/No					
B. Are they free of stains (e.g., petroleum, paint)?				Yes/No					
C. Can excessive solids/pollutants runoff to the MS4? (Including Sheet Flow)				Yes/No					
D. Are bins/roll off containers leaky or uncovered?				Yes/No/NA		Who owns the containers?			
Non Structural BMPs									
A. Is staff trained to prevent stormwater pollution? (If yes, indicate frequency.)				Yes/No/NA					
B. Are spill kits available and labeled?				Yes/No/NA					
Comments:									

APPENDIX E: FOIA Request Form

Required fields identified



County of Fairfax, Virginia

To protect and enrich the quality of life for the people, neighborhoods and diverse communities

Virginia Freedom of Information Act (VFOIA) Request Form

Name: required Date: required

Organization: required Phone: required

Email: required Fax:

Street Address:

City: State: Zip Code:

I am requesting the following records (please be as specific as possible):

required - example - Please email a copy of the final inspection report on (name of business) that was conducted on (date). Submit this request to the inspector.

Please identify any County agencies who would be in the custody of requested records (if known):

Public Works and Environmental Services, Stormwater Planning Division, IHRR/IDID Section

Charges:
VFOIA permits a public body to make reasonable charges not to exceed the actual cost incurred in accessing, duplicating, supplying, or searching for the requested records. You may request an advance estimate of the charges. If the estimated charges exceed \$200, payment may be required prior to processing your request.

VFOIA Disclaimer:
Contact information, and any other information that you submit on this form may be subject to disclosure under VFOIA.

To submit your VFOIA Request, please email this form to FOIA@fairfaxcounty.gov

Mar. 2019

Fairfax County is committed to nondiscrimination on the basis of disability in all county programs, services and activities. Reasonable accommodations will be provided upon request. For more information, call 703-324-7329, TTY 711.

Fairfax County Office of Public Affairs
Countywide FOIA Office
12000 Government Center Parkway, Suite 551
Fairfax, VA 22035
703-324-7329
www.fairfaxcounty.gov/publicaffairs/foia

Appendix F: Compliance Review Letter to DEQ



County of Fairfax, Virginia

To protect and enrich the quality of life for the people, neighborhoods and diverse communities of Fairfax County

DATE

Ms. Anna Tuthill
Regional Industrial Stormwater Coordinator
Virginia Department of Environmental Quality
Northern Regional Office
13901 Crown Court
Woodbridge, VA 22193

Reference:

Dear Ms. Tuthill:

In accordance with Part I.B.2.g.5 of Fairfax County’s Municipal Separate Storm Sewer System (MS4) permit, “the permittee shall refer the following facilities to the Department of Environmental Quality (DEQ), Northern Regional Office, for DEQ compliance review under the Virginia Water Control Law:

- a. Facilities and operations having non-stormwater discharges that do not have coverage under an existing VPDES permit.
- b. Facilities and operations identified pursuant to 40 CFR Part 122.26(b)(14) with manufacturing, processing, or raw materials storage outside that do not have coverage under an existing VPDES industrial stormwater permit.
- c. Any VPDES industrial stormwater permit facility where there is evidence of significant pollutant loadings to the MS4.
- d. Facilities that do not submit signed copies of Discharge Monitoring Reports (DMRs) to the permittee as required under a VPDES industrial stormwater permit.

The above referenced facility is being referred to DEQ in accordance with [LETTER] from the above list.

OBSERVATIONS

Please report any DEQ compliance review findings or conclusions regarding this facility to the following address:

Mr. Shannon Curtis, Chief
Fairfax County Department of Public Works and Environmental Services
Watershed Assessment Branch
Stormwater Planning Division
12000 Government Center Parkway, Suite 449
Fairfax, VA 22035-0052

Department of Public Works and Environmental Services
Stormwater Planning Division
12000 Government Center Parkway, Suite 449
Fairfax, VA 22035-0052
Phone: 703-324-5500, TTY: 711, Fax: 703-802-5955
www.fairfaxcounty.gov/publicworks



Ms. Anna Tuthill
SUBJECT
Page 2 of 2

We appreciate your cooperation in this matter. Please contact Takisha Cannon at 703-324-5500 with any questions or concerns you may have regarding the above request.

Sincerely,



Shannon Curtis, Chief
Watershed Assessment Branch

cc: Takisha Cannon, Ecologist IV, Watershed Assessment Branch (WAB), Stormwater Planning Division (SWPD), Department of Public Works and Environmental Services (DPWES)