



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

VALLEY REGIONAL OFFICE

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**STATE WATER CONTROL BOARD
ENFORCEMENT ACTION - ORDER BY CONSENT
ISSUED TO
CITY OF WINCHESTER
FOR THE
CITY OF WINCHESTER COLLECTION SYSTEM
Unpermitted Discharge**

SECTION A: Purpose

This is a Consent Order issued under the authority of Va. Code § 62.1-44.15, between the State Water Control Board and the City of Winchester, regarding the City of Winchester Collection System, for the purpose of resolving certain violations of the State Water Control Law and the applicable regulation.

SECTION B: Definitions

Unless the context clearly indicates otherwise, the following words and terms have the meaning assigned to them below:

1. "303(b) or 303(d)" means the report required by Section 305(b) of the Clean Water Act (33 United States Code § 1315(b)), and Va. Code § 62.1-44.19:5 for providing Congress and the public an accurate and comprehensive assessment of the quality of State surface waters. Since 2004, DEQ has combined both the 305(b) Water Quality Assessment and the 303(d) Report on Impaired Waters into the Virginia Water Quality Assessment 305(b)/303(d) Integrated Report.
2. "Board" means the State Water Control Board, a permanent citizens' board of the Commonwealth of Virginia, as described in Va. Code §§ 10.1-1184 and 62.1-44.7.

3. "Department" or "DEQ" means the Department of Environmental Quality, an agency of the Commonwealth of Virginia, as described in Va. Code § 10.1-1183.
4. "Director" means the Director of the Department of Environmental Quality, as described in Va. Code § 10.1-1185.
5. "Discharge" means discharge of a pollutant. 9 VAC 25-31-10.
6. "Discharge of a pollutant" when used with reference to the requirements of the VPDES permit program means:
 - (a) Any addition of any pollutant or combination of pollutants to surface waters from any point source; or
 - (b) Any addition of any pollutant or combination of pollutants to the waters of the contiguous zone or the ocean from any point source other than a vessel or other floating craft which is being used as a means of transportation.
7. "Effluent" means wastewater – treated or untreated – that flows out of a treatment plant, sewer, or industrial outfall.
8. "Notice of Violation" or "NOV" means a type of Notice of Alleged Violation under Va. Code § 62.1-44.15.
9. "Order" means this document, also known as a "Consent Order" or "Order by Consent," a type of Special Order under the State Water Control Law.
10. "Pollutant" means dredged spoil, solid waste, incinerator residue, filter backwash, sewage, garbage, sewage sludge, munitions, chemical wastes, biological materials, radioactive materials (except those regulated under the Atomic Energy Act of 1954, as amended (42 USC § 2011 *et seq.*)), heat, wrecked or discarded equipment, rock, sand, cellar dirt and industrial, municipal, and agricultural waste discharged into water... 9 VAC 25-31-10.
11. "Pollution" means such alteration of the physical, chemical, or biological properties of any state waters as will or is likely to create a nuisance or render such waters (a) harmful or detrimental or injurious to the public health, safety, or welfare or to the health of animals, fish, or aquatic life; (b) unsuitable with reasonable treatment for use as present or possible future sources of public water supply; or (c) unsuitable for recreational, commercial, industrial, agricultural, or other reasonable uses, provided that (i) an alteration of the physical, chemical, or biological property of state waters or a discharge or deposit of sewage, industrial wastes or other wastes to state waters by any owner which by itself is not sufficient to cause pollution but which, in combination with such alteration of or discharge or deposit to state waters by other owners, is sufficient to cause pollution; (ii) the discharge of untreated sewage by any owner into state waters; and (iii) contributing to the contravention of standards of water quality duly established by the Board, are "pollution." Va. Code § 62.1-44.3.

12. "Regulation" means the VPDES Permit Regulation, 9 VAC 25-31-10 *et seq.*
13. "State Water Control Law" means Chapter 3.1 (§ 62.1-44.2 *et seq.*) of Title 62.1 of the Va. Code.
14. "State waters" means all water, on the surface and under the ground, wholly or partially within or bordering the Commonwealth or within its jurisdiction, including wetlands. Va. Code § 62.1-44.3.
15. "System" means the City of Winchester owned Collection System in Winchester, Virginia, which collects and conveys sewage and other municipal wastes, for the residents and businesses of the City of Winchester, to the Opequon Water Reclamation Facility, a Publicly Owned Treatment Works operated by Frederick-Winchester Service Authority.
16. "Va. Code" means the Code of Virginia (1950), as amended.
17. "VAC" means the Virginia Administrative Code.
18. "VPDES" means Virginia Pollutant Discharge Elimination System.
19. "Winchester" means the City of Winchester, a political subdivision of the Commonwealth of Virginia. Winchester is a "person" within the meaning of Va. Code § 62.1-44.3.

SECTION C: Findings of Fact and Conclusions of Law

1. Winchester owns the System, located in Winchester, Virginia.
2. Abrams Creek is located in Potomac River Basin. Abrams Creek is listed in the 303(d) as impaired for E. coli, Fecal Coliform, and Sediment (benthic); sources of impact are Municipal (Urbanized High Density Area), Wildlife Other than Waterfowl, and Non-Point Source Agriculture.
3. Buffalo Lick Run is located in the Potomac River Basin. Buffalo Lick Run is listed as fully supporting aquatic life and not impaired.
4. Opequon Creek is located in the Potomac River Basin. Opequon Creek is listed in the 303(d) as impaired for E. coli and Sediment (benthic); sources of impact are Municipal (Urbanized High Density Area), Wildlife Other than Waterfowl, and Non-Point Source Agriculture.
5. Hogue Run is located in the Potomac River Basin. Hogue Run was not assessed.
6. From April 2018 to April 2020, Winchester reported approximately 180 sanitary sewer overflows (SSOs), from their System that reached state waters: Buffalo Lick Run, Hogue Run, Opequon Creek, and Abrams Creek. All but two of the SSOs were attributed to

heavy rains causing inflow and infiltration (I&I) into the System. The SSOs are listed in Appendix C in this Order.

7. On February 21, 2019, DEQ issued NOV No. 2019-VRO-0003 to Winchester for the unpermitted discharges to state waters from April 2018 through December 2018.
8. On March 15, 2019, DEQ staff met with Winchester staff to discuss the NOV and actions Winchester had planned to resolve the SSOs. Winchester provided documentation that they invested \$6.8 million from 2008-2018, in sanitary sewer replacements and replacement of manholes in the System. During the meeting, Winchester conveyed that an additional \$8.7 million in projects were planned for 2019-2021 for upgrades to the system through pump station repairs/replacements, additional sanitary sewer line replacement/lining, additional manhole replacement, and the purchase of a new vac truck. Winchester referenced the aging sanitary system and I&I as contributing factors to the SSOs.
9. On August 5, 2019, DEQ staff spoke with Winchester staff to discuss the additional projects, and DEQ requested a specific schedule for upgrades, to be included in the proposed Consent Order.
10. On August 30, 2019, Winchester submitted a plan and schedule to DEQ for inclusion into the Consent Order as Appendix A.
11. On September 9, 2019, DEQ reviewed and approved the proposed schedule which is included in the proposed Consent Order.
12. On January 27, 2020, DEQ issued a Certificate to Construct to Winchester for the Pennsylvania Avenue Pump Station and Conway Pump Station replacement project.
13. Va. Code § 62.1-44.5 states that: “[E]xcept in compliance with a certificate issued by the Board, it shall be unlawful for any person to discharge into state waters sewage, industrial wastes, other wastes, or any noxious or deleterious substances.”
14. The Regulation, at 9 VAC 25-31-50, also states that except in compliance with a VPDES permit, or another permit issued by the Board, it is unlawful to discharge into state waters sewage, industrial wastes or other wastes.
15. Abrams Creek, Buffalo Lick Run, Opequon Creek, and Hogue Run are surface waters located wholly within the Commonwealth and are defined as a “state water” under State Water Control Law.
16. Based on the results of the March 15, 2019 meeting, and the documentation submitted by Winchester from April 2018 through February 2020 the Board concludes that Winchester has violated Va. Code 62.1-44.5 and 9 VAC 25-31-50 by discharging untreated sewage and municipal wastes from the System to state waters as described in paragraph C(4) through C(13), above.

17. In order for Winchester to return to compliance, DEQ and Winchester have agreed to the Schedule of Compliance, which is incorporated as Appendix A of this Order.

SECTION D: Agreement and Order

Accordingly, by virtue of the authority granted it in Va. Code §§ 62.1-44.15, the Board orders Winchester and Winchester agrees to:

1. Perform the actions described in Appendix A of this Order; and
2. Pay a civil charge of \$92,625 in settlement of the violations cited in this Order. The civil charge shall be paid in accordance with the following schedule:

Due Date	Amount
September 20, 2020	\$46,312.50 or balance
December 20, 2020	\$46,312.50

3. If the Department fails to receive a civil charge payment pursuant to the schedule described above, the payment shall be deemed late. If any payment is late by 30 days or more, the entire remaining balance of the civil charge shall become immediately due and owing under this Order, and the Department may demand in writing full payment by Winchester. Within 15 days of receipt of such letter, Winchester shall pay the remaining balance of the civil charge. Any acceptance by the Department of a late payment or of any payment of less than the remaining balance shall not act as a waiver of the acceleration of the remaining balance under this Order.
4. All payments shall be made by check, certified check, money order or cashier's check payable to the "Treasurer of Virginia," and delivered to:

Receipts Control
Department of Environmental Quality
Post Office Box 1104
Richmond, Virginia 23218

5. Winchester shall include its Federal Employer Identification Number (FEIN) with the civil charge payment and shall indicate that the payment is being made in accordance with the requirements of this Order for deposit into the Virginia Environmental Emergency Response Fund (VEERF). If the Department has to refer collection of moneys due under this Order to the Department of Law, Winchester shall be liable for attorneys' fees of 30% of the amount outstanding.

SECTION E: Administrative Provisions

1. The Board may modify, rewrite, or amend this Order with the consent of Winchester for good cause shown by Winchester, or on its own motion pursuant to the Administrative Process Act, Va. Code § 2.2-4000 *et seq.*, after notice and opportunity to be heard.

2. This Order addresses and resolves only those violations specifically identified in Section C of this Order. This Order shall not preclude the Board or the Director from taking any action authorized by law, including but not limited to: (1) taking any action authorized by law regarding any additional, subsequent, or subsequently discovered violations; (2) seeking subsequent remediation of the facility; or (3) taking subsequent action to enforce the Order.
3. For purposes of this Order and subsequent actions with respect to this Order only, Winchester admits the jurisdictional allegations, findings of fact, and conclusions of law contained herein.
4. Winchester consents to venue in the Circuit Court of the City of Richmond for any civil action taken to enforce the terms of this Order.
5. Winchester declares it has received fair and due process under the Administrative Process Act and the State Water Control Law and it waives the right to any hearing or other administrative proceeding authorized or required by law or regulation, and to any judicial review of any issue of fact or law contained herein. Nothing herein shall be construed as a waiver of the right to any administrative proceeding for, or to judicial review of, any action taken by the Board to modify, rewrite, amend, or enforce this Order.
6. Failure by Winchester to comply with any of the terms of this Order shall constitute a violation of an order of the Board. Nothing herein shall waive the initiation of appropriate enforcement actions or the issuance of additional orders as appropriate by the Board or the Director as a result of such violations. Nothing herein shall affect appropriate enforcement actions by any other federal, state, or local regulatory authority.
7. If any provision of this Order is found to be unenforceable for any reason, the remainder of the Order shall remain in full force and effect.
8. Winchester shall be responsible for failure to comply with any of the terms and conditions of this Order unless compliance is made impossible by earthquake, flood, other acts of God, war, strike, or such other unforeseeable circumstances beyond its control and not due to a lack of good faith or diligence on its part. Winchester shall demonstrate that such circumstances were beyond its control and not due to a lack of good faith or diligence on its part. Winchester shall notify the DEQ Regional Director verbally within 24 hours and in writing within three business days when circumstances are anticipated to occur, are occurring, or have occurred that may delay compliance or cause noncompliance with any requirement of the Order. Such notice shall set forth:
 - a. the reasons for the delay or noncompliance;
 - b. the projected duration of any such delay or noncompliance;
 - c. the measures taken and to be taken to prevent or minimize such delay or noncompliance; and

- d. the timetable by which such measures will be implemented and the date full compliance will be achieved.

Failure to so notify the Regional Director verbally within 24 hours and in writing within three business days, of learning of any condition above, which the parties intend to assert will result in the impossibility of compliance, shall constitute a waiver of any claim to inability to comply with a requirement of this Order.

9. This Order is binding on the parties hereto and any successors in interest, designees and assigns, jointly and severally.
10. This Order shall become effective upon execution by both the Director or his designee and Winchester. Nevertheless, Winchester agrees to be bound by any compliance date which precedes the effective date of this Order.
11. This Order shall continue in effect until:
 - a. the Director or his designee terminates the Order after Winchester has completed all of the requirements of the Order;
 - b. Winchester petitions the Director or his designee to terminate the Order after it has completed all of the requirements of the Order and the Director or his designee approves the termination of the Order; or
 - c. the Director or Board terminates the Order in his or its sole discretion upon 30 days' written notice to Winchester.

Termination of this Order, or any obligation imposed in this Order, shall not operate to relieve Winchester from its obligation to comply with any statute, regulation, permit condition, other order, certificate, certification, standard, or requirement otherwise applicable.

12. Any plans, reports, schedules or specifications attached hereto or submitted by Winchester and approved by the Department pursuant to this Order are incorporated into this Order. Any non-compliance with such approved documents shall be considered a violation of this Order.
13. The undersigned representative of Winchester certifies that he or she is a responsible official authorized to enter into the terms and conditions of this Order and to execute and legally bind Winchester to this document. Any documents to be submitted pursuant to this Order shall also be submitted by a responsible official of Winchester.
14. This Order constitutes the entire agreement and understanding of the parties concerning settlement of the violations identified in Section C of this Order, and there are no representations, warranties, covenants, terms or conditions agreed upon between the parties other than those expressed in this Order.
15. By its signature below, Winchester voluntarily agrees to the issuance of this Order.

And it is so ORDERED this _____ day of _____, 2020.

Amy T. Owens, Regional Director
Department of Environmental Quality

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The City of Winchester voluntarily agrees to the issuance of this Order.

Date: 8/25/2020 By: Mary T. Price, Interim City Manager
(Person) (Title)
City of Winchester

Commonwealth of Virginia

City/County of Winchester

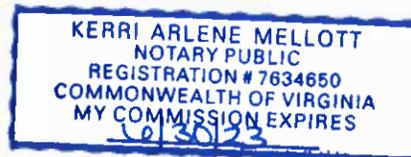
The foregoing document was signed and acknowledged before me this 25 day of August, 2020, by Mary T. Price who is Interim City Manager of the City of Winchester, on behalf of the City of Winchester.

Kerri Arlene Mellott
Notary Public

7634650
Registration No.

My commission expires: June 30, 2023

Notary seal:



APPENDIX A SCHEDULE OF COMPLIANCE

1. I&I Reduction

a. Pennsylvania Avenue Pump Station and Conway Pump Station Replacements

- (1) **By December 31, 2020**, Winchester shall begin construction of the Pennsylvania Avenue Pump Station and the Conway Pump Station;
- (2) **By December 31, 2021**, Winchester shall complete construction and obtain a Certificate to Operate from DEQ for the Pennsylvania Avenue Pump Station and the Conway Pump Station.

b. Capitol Pump Station and Superior Pump Station Replacements

- (1) **By December 31, 2024**, Winchester shall obtain a Certificate to Construct from DEQ and begin construction of the Capitol Pump Station and the Superior Pump Station;
- (2) **By December 31, 2025**, Winchester shall complete construction and obtain a Certificate to Operate from DEQ for the Capitol Pump Station and the Superior Pump Station.

c. Metershed Focus: Kent Street, S. Cameron Street, and Woodstock Lane (collectively referred to as KCW, 5,000 linear feet total repair/replacement), see map Appendix B

- (1) **By August 31, 2020**, Winchester shall initiate construction of the lining and/or replacement of sanitary sewer lines in the KCW portion of the metershed;
- (2) **By June 30, 2021**, Winchester shall complete construction of the lining and/or replacement of sanitary sewer lines in the KCW portion of the metershed;
- (3) **By December 31, 2021**, Winchester shall complete flow monitoring to determine I&I reduction in the KCW metershed.

d. Metershed Focus: Ralph Shockey Drive, crossing Senseny Road (collectively referred to as RS Metershed, 10,000 linear feet of repair/replacement), see map in Appendix B

- (1) **By August 31, 2021**, Winchester shall initiate construction of the lining and/or replacement of sanitary sewer lines in the RS portion of the metershed;
- (2) **By June 30, 2022**, Winchester shall complete construction of the lining and/or replacement of sanitary sewer lines in the RS portion of the metershed;
- (3) **By December 31, 2022**, Winchester shall complete flow monitoring to determine I&I reduction in the RS metershed.

2. General Requirements

- a. Winchester shall submit quarterly reports to DEQ, with the first report being due October 10, 2020. Subsequent quarterly reports will be due January 10, April 10, and July 10, until the cancellation of this Order. The quarterly reports shall contain:

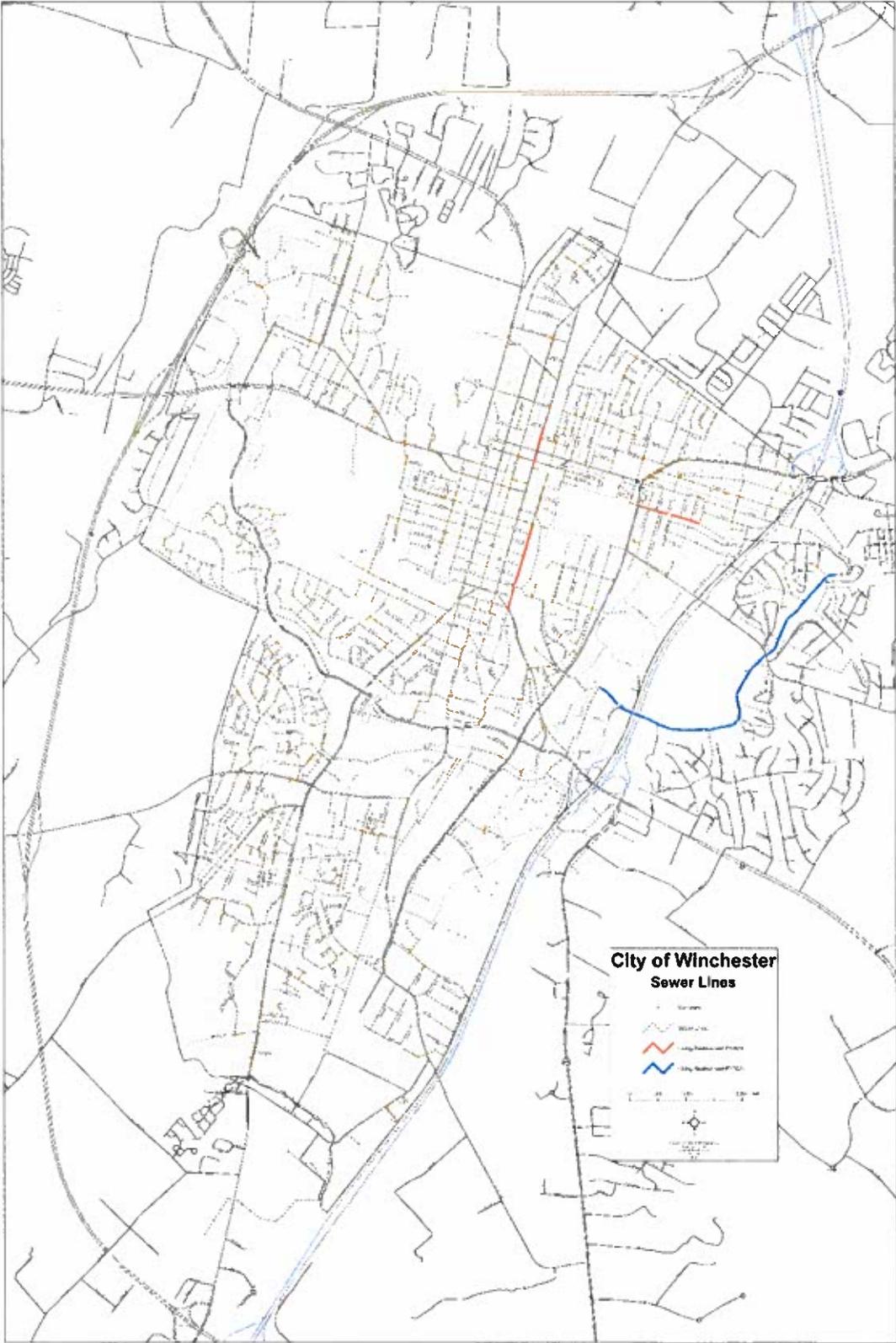
- (1) A summary of all work completed since the previous report, in accordance with this Order;
 - (2) A projection of work to be completed during the upcoming quarterly period in accordance with this Order;
 - (3) A statement regarding any anticipated problems in complying with this Order.
- b. No later than 14 days following a date identified in the above schedule of compliance, Winchester shall submit to DEQ a written notice of compliance or noncompliance with the scheduled item. In the case of noncompliance, notice shall include the cause of noncompliance, any remedial actions taken, and the probability of meeting the next scheduled item.

3. **DEQ Contact**

Unless otherwise specified in this Order, Winchester shall submit all requirements of Appendix A of this Order to:

Eric Millard
Enforcement Specialist Senior
VA DEQ – Valley Regional Office
PO Box 3000, Harrisonburg, VA 22801
Phone: (540) 574-7813
Fax: (540) 574-7878
Eric.millard@deq.virginia.gov

APPENDIX B CITY OF WINCHESTER SEWER LINE REPLACEMENT MAP



APPENDIX C
SSOs FROM APRIL 2018-APRIL 2020

Date	Incident Name	Address	State Waters	Volume (Gallons)
4/16/2018	SSO - City of Winchester	110 Meade Dr	Abrams Creek	9,900
4/16/2018	SSO - City of Winchester	1726 Woodstock Ln	Abrams Creek	4,800
4/16/2018	SSO - City of Winchester	221 Alta Vista Dr	Abrams Creek	5,700
5/15/2018	SSO - City of Winchester	1726 Woodstock Ln	Abrams Creek	14,400
5/15/2018	SSO - City of Winchester	221 Alta Vista Dr	Abrams Creek	45,000
5/16/2018	SSO - City of Winchester	1726 Woodstock Ln	Abrams Creek	301,500
5/17/2018	SSO - City of Winchester	110 Meade Dr	Abrams Creek	65,700
5/17/2018	SSO - City of Winchester	1850 Apple Blossom Dr	Abrams Creek	86,400
5/17/2018	SSO - City of Winchester	1933 Mall Blvd	Abrams Creek	51,840
5/17/2018	SSO - City of Winchester	1950 South Pleasant Valley Rd	Abrams Creek	96,000
5/17/2018	SSO - City of Winchester	337, 381, and 901 Opequon Ave	Abrams Creek	10,800
5/17/2018	SSO - City of Winchester	351 Capitol Ln	Hogue Run	Unknown (12 hours)
5/17/2018	SSO - City of Winchester	452 Superior Ave	Buffalo Lick Run	Unknown (30 hours)
5/17/2018	SSO - City of Winchester	620 Millwood Ave	Abrams Creek	48,000
5/17/2018	SSO - City of Winchester	715 Battle Ave	Opequon Creek	Unknown (12 hours)
5/17/2018	SSO - City of Winchester	Green St and Battle Ave	Abrams Creek	86,400
5/18/2018	SSO - City of Winchester	715 Battle Ave	Opequon Creek	Unknown (3 hours)
5/18/2018	SSO - City of Winchester	Baker St and Cameron St	Abrams Creek	56,250
5/19/2018	SSO - City of Winchester	337, 381, and 901 Opequon Ave	Abrams Creek	44,100
5/19/2018	SSO - City of Winchester	351 Capitol Ln	Hogue Run	Unknown (10 hours)
5/19/2018	SSO - City of Winchester	452 Superior Ave	Buffalo Lick Run	Unknown (14.5 hours)
5/19/2018	SSO - City of Winchester	Berryville Ave and Dunlap St	Abrams Creek	5,400
6/3/2018	SSO - City of Winchester	110 Meade Dr	Abrams Creek	19,800
6/3/2018	SSO - City of Winchester	1726 Woodstock Ln	Abrams Creek	13,725
6/3/2018	SSO - City of Winchester	1726 Woodstock Ln	Abrams Creek	204,750
6/3/2018	SSO - City of Winchester	1933 Mall Blvd	Abrams Creek	15,840
6/3/2018	SSO - City of Winchester	1950 South Pleasant Valley Rd	Abrams Creek	47,700
6/3/2018	SSO - City of Winchester	221 Alta Vista Dr	Abrams Creek	27,300
6/3/2018	SSO - City of Winchester	337, 381, and 901 Opequon Ave	Abrams Creek	19,800
6/3/2018	SSO - City of Winchester	351 Capitol Ln	Hogue Run	Unknown (5 hours)
6/3/2018	SSO - City of Winchester	431 Shady Elm Ave	Opequon Creek	Unknown (15.5 hours)
6/3/2018	SSO - City of Winchester	452 Superior Ave	Buffalo Lick Run	Unknown (30.5 hours)
6/3/2018	SSO - City of Winchester	620 Millwood Ave	Abrams Creek	23,400
6/3/2018	SSO - City of Winchester	715 Battle Ave	Opequon Creek	Unknown (10 hours)
6/3/2018	SSO - City of Winchester	Baker St and Cameron St	Abrams Creek	13,725
6/4/2018	SSO - City of Winchester	Morningside Dr and Richard Ave	Abrams Creek	13,500
6/9/2018	SSO - City of Winchester	1950 South Pleasant Valley Rd	Abrams Creek	4,200
6/11/2018	SSO - City of Winchester	1850 Apple Blossom Dr	Abrams Creek	19,800
6/11/2018	SSO - City of Winchester	1950 South Pleasant Valley Rd	Abrams Creek	26,400
6/22/2018	SSO - City of Winchester	1726 Woodstock Ln	Abrams Creek	238,500
6/22/2018	SSO - City of Winchester	1850 Apple Blossom Dr	Abrams Creek	62,550
6/22/2018	SSO - City of Winchester	1950 South Pleasant Valley Rd	Abrams Creek	83,400
6/22/2018	SSO - City of Winchester	221 Alta Vista Dr	Abrams Creek	31,800
6/22/2018	SSO - City of Winchester	351 Capitol Ln	Hogue Run	Unknown (17 hours)
6/22/2018	SSO - City of Winchester	452 Superior Ave	Buffalo Lick Run	Unknown (38 hours)

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6/22/2018	SSO - City of Winchester	620 Millwood Ave	Abrams Creek	31,800
6/22/2018	SSO - City of Winchester	715 Battle Ave	Opequon Creek	Unknown (3 hours)
6/23/2018	SSO - City of Winchester	1001 East Cork St	Abrams Creek	26,040
6/23/2018	SSO - City of Winchester	1933 Mall Blvd	Abrams Creek	30,780
6/23/2018	SSO - City of Winchester	2537 Papermill Rd	Abrams Creek	15,120
6/23/2018	SSO - City of Winchester	901 Opequon Ave	Abrams Creek	18,750
6/23/2018	SSO - City of Winchester	Morningside Dr and Richards Ave	Abrams Creek	30,900
7/4/2018	SSO - City of Winchester	1001 East Cork St	Abrams Creek	8,640
7/4/2018	SSO - City of Winchester	1726 Woodstock Ln	Abrams Creek	20,160
7/4/2018	SSO - City of Winchester	1850 Apple Blossom Dr	Abrams Creek	10,080
7/4/2018	SSO - City of Winchester	1950 South Pleasant Valley Rd	Abrams Creek	12,960
7/4/2018	SSO - City of Winchester	351 Capitol Ln	Hogue Run	Unknown (2 hours)
7/4/2018	SSO - City of Winchester	452 Superior Ave	Buffalo Lick Run	Unknown (2 hours)
7/4/2018	SSO - City of Winchester	620 Millwood Ave	Abrams Creek	5,760
7/15/2018	SSO - City of Winchester	1726 Woodstock Ln	Abrams Creek	10,800
7/15/2018	SSO - City of Winchester	1850 Apple Blossom Dr	Abrams Creek	4,800
7/15/2018	SSO - City of Winchester	1933 Mall Blvd	Abrams Creek	3,000
7/15/2018	SSO - City of Winchester	1950 South Pleasant Valley Rd	Abrams Creek	6,000
7/15/2018	SSO - City of Winchester	351 Capitol Ln	Hogue Run	Unknown (1 hour)
7/15/2018	SSO - City of Winchester	452 Superior Ave	Buffalo Lick Run	Unknown (2 hours)
7/25/2018	SSO - City of Winchester	110 Meade Dr	Abrams Creek	13,920
7/25/2018	SSO - City of Winchester	1726 Woodstock Ln	Abrams Creek	22,320
7/25/2018	SSO - City of Winchester	1850 Apple Blossom Dr	Abrams Creek	16,200
7/25/2018	SSO - City of Winchester	1950 South Pleasant Valley Rd	Abrams Creek	5,040
8/2/2018	SSO - City of Winchester	1726 Woodstock Ln	Abrams Creek	4,050
8/3/2018	SSO - City of Winchester	1726 Woodstock Ln	Abrams Creek	187,875
8/3/2018	SSO - City of Winchester	351 Capitol Ln	Hogue Run	Unknown (11 hours)
8/3/2018	SSO - City of Winchester	452 Superior Ave	Buffalo Lick Run	Unknown (15 hours)
8/3/2018	SSO - City of Winchester	715 Battle Ave	Opequon Creek	Unknown (3 hours)
8/3/2018	SSO - City of Winchester	Green St and Battle Ave	Abrams Creek	18,000
8/4/2018	SSO - City of Winchester	1001 East Cork St	Abrams Creek	1,440
8/4/2018	SSO - City of Winchester	1850 Apple Blossom Dr	Abrams Creek	46,500
8/4/2018	SSO - City of Winchester	1933 Mall Blvd	Abrams Creek	1,440
8/4/2018	SSO - City of Winchester	1950 South Pleasant Valley Rd	Abrams Creek	26,100
8/4/2018	SSO - City of Winchester	2537 Papermill Rd	Abrams Creek	12,960
8/4/2018	SSO - City of Winchester	620 Millwood Ave	Abrams Creek	1,200
8/4/2018	SSO - City of Winchester	Baker St and Cameron St	Abrams Creek	3,300
8/4/2018	SSO - City of Winchester	Morningside Dr and Richards Ave	Abrams Creek	13,050
8/7/2018	SSO - City of Winchester	1726 Woodstock Ln	Abrams Creek	70,875
8/7/2018	SSO - City of Winchester	1850 Apple Blossom Dr	Abrams Creek	13,050
8/7/2018	SSO - City of Winchester	1950 South Pleasant Valley Rd	Abrams Creek	14,400
8/7/2018	SSO - City of Winchester	221 Alta Vista Dr	Abrams Creek	7,380
8/7/2018	SSO - City of Winchester	Baker St and Cameron St	Abrams Creek	13,275
8/7/2018	SSO - City of Winchester	Berryville Ave and Dunlap St	Abrams Creek	1,950
9/9/2018	SSO - City of Winchester	110 Meade Dr	Abrams Creek	10,350
9/9/2018	SSO - City of Winchester	1726 Woodstock Ln	Abrams Creek	54,495
9/9/2018	SSO - City of Winchester	1850 Apple Blossom Dr	Abrams Creek	34,800
9/9/2018	SSO - City of Winchester	1933 Mall Blvd	Abrams Creek	11,340
9/9/2018	SSO - City of Winchester	1950 South Pleasant Valley Rd	Abrams Creek	11,340

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9/9/2018	SSO - City of Winchester	221 Alta Vista Dr	Abrams Creek	36,120
9/10/2018	SSO - City of Winchester	Morningside Dr and Richards Ave	Abrams Creek	13,350
9/25/2018	SSO - City of Winchester	1726 Woodstock Ln	Abrams Creek	18,600
9/25/2018	SSO - City of Winchester	1850 Apple Blossom Dr	Abrams Creek	8,550
9/25/2018	SSO - City of Winchester	221 Alta Vista Dr	Abrams Creek	8,325
9/26/2018	SSO - City of Winchester	1726 Woodstock Ln	Abrams Creek	7,770
9/26/2018	SSO - City of Winchester	1850 Apple Blossom Dr	Abrams Creek	7,020
9/26/2018	SSO - City of Winchester	221 Alta Vista Dr	Abrams Creek	5,130
9/27/2018	SSO - City of Winchester	110 Meade Dr	Abrams Creek	50,880
9/27/2018	SSO - City of Winchester	1726 Woodstock Ln	Abrams Creek	91,980
9/27/2018	SSO - City of Winchester	1850 Apple Blossom Dr	Abrams Creek	55,350
9/27/2018	SSO - City of Winchester	1933 Mall Blvd	Abrams Creek	25,740
9/27/2018	SSO - City of Winchester	1950 South Pleasant Valley Rd	Abrams Creek	30,900
9/27/2018	SSO - City of Winchester	221 Alta Vista Dr	Abrams Creek	50,085
9/27/2018	SSO - City of Winchester	341 Opequon Ave	Abrams Creek	5,490
9/27/2018	SSO - City of Winchester	452 Superior Ave	Buffalo Lick Run	Unknown (22 hours)
9/27/2018	SSO - City of Winchester	715 Battle Ave	Opequon Creek	Unknown (27 hours)
9/27/2018	SSO - City of Winchester	901 Opequon Ave	Abrams Creek	11,700
9/27/2018	SSO - City of Winchester	Baker St and Cameron St	Abrams Creek	16,800
9/27/2018	SSO - City of Winchester	Morningside Dr and Richards Ave	Abrams Creek	27,720
9/28/2018	SSO - City of Winchester	1001 East Cork St	Abrams Creek	27,000
9/28/2018	SSO - City of Winchester	2537 Papermill Rd	Abrams Creek	16,560
9/28/2018	SSO - City of Winchester	351 Capitol Ln	Hogue Run	Unknown (7 hours)
9/28/2018	SSO - City of Winchester	Berryville Ave and Dunlap St	Abrams Creek	3,840
9/28/2018	SSO - City of Winchester	Green St and Battle Ave	Abrams Creek	7,500
11/29/2018	SSO - City of Winchester	711 Millwood Ave	Abrams Creek	4,500
12/15/2018	SSO - City of Winchester	1001 East Cork St	Abrams Creek	24,504
12/15/2018	SSO - City of Winchester	110 Meade Dr	Abrams Creek	28,080
12/15/2018	SSO - City of Winchester	1726 Woodstock Ln	Abrams Creek	58,320
12/15/2018	SSO - City of Winchester	1850 Apple Blossom Dr	Abrams Creek	25,704
12/15/2018	SSO - City of Winchester	1933 Mall Blvd	Abrams Creek	18,300
12/15/2018	SSO - City of Winchester	1950 South Pleasant Valley Rd	Abrams Creek	10,980
12/15/2018	SSO - City of Winchester	221 Alta Vista Dr	Abrams Creek	25,920
12/15/2018	SSO - City of Winchester	2537 Papermill Rd	Abrams Creek	12,120
12/15/2018	SSO - City of Winchester	452 Superior Ave	Buffalo Lick Run	Unknown (3.5 hours)
12/15/2018	SSO - City of Winchester	620 Millwood Ave	Abrams Creek	9,216
12/15/2018	SSO - City of Winchester	Morningside Dr and Richards Ave	Abrams Creek	12,240
12/21/2018	SSO - City of Winchester	1726 Woodstock Ln	Abrams Creek	6,300
12/21/2018	SSO - City of Winchester	221 Alta Vista Dr	Abrams Creek	8,250
1/19/2019	SSO - City of Winchester	1726 Woodstock Ln	Abrams Creek	29,445
1/19/2019	SSO - City of Winchester	221 Alta Vista Dr	Abrams Creek	20,385
1/19/2019	SSO - City of Winchester	1850 Apple Blossom Dr	Abrams Creek	27,576
1/24/2019	SSO - City of Winchester	1726 Woodstock Ln	Abrams Creek	270
1/31/2019	SSO - City of Winchester	246 Dodge Ave	Abrams Creek	800
2/12/2019	SSO - City of Winchester	1726 Woodstock Ln	Abrams Creek	15,639
2/12/2019	SSO - City of Winchester	221 Alta Vista Dr	Abrams Creek	15,264
2/12/2019	SSO - City of Winchester	1850 Apple Blossom Dr	Abrams Creek	8,280
2/12/2019	SSO - City of Winchester	116 Wild Rose Circle	Abrams Creek	3,600

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2/24/2019	SSO - City of Winchester	1726 Woodstock Ln	Abrams Creek	11,040
2/24/2019	SSO - City of Winchester	221 Alta Vista Dr	Abrams Creek	6,900
2/24/2019	SSO - City of Winchester	1850 Apple Blossom Dr	Abrams Creek	8,280
2/24/2019	SSO - City of Winchester	116 Wild Rose Circle	Abrams Creek	5,400
3/21/2019	SSO - City of Winchester	452 Superior Ave	Buffalo Lick Run	Unknown (18 hours)
3/21/2019	SSO - City of Winchester	1726 Woodstock Ln	Abrams Creek	21,120
3/21/2019	SSO - City of Winchester	221 Alta Vista Dr	Abrams Creek	9,900
3/21/2019	SSO - City of Winchester	1850 Apple Blossom Dr	Abrams Creek	15,480
3/21/2019	SSO - City of Winchester	116 Wild Rose Circle	Abrams Creek	9,120
3/21/2019	SSO - City of Winchester	620 Millwood Ave	Abrams Creek	3,240
3/21/2019	SSO - City of Winchester	110 Meade Dr	Abrams Creek	8,640
3/21/2019	SSO - City of Winchester	1933 Mall Blvd	Abrams Creek	5,100
3/21/2019	SSO - City of Winchester	1950 South Pleasant Valley Rd	Abrams Creek	6,300
4/19/2019	SSO - City of Winchester	1726 Woodstock Ln	Abrams Creek	19,440
4/19/2019	SSO - City of Winchester	221 Alta Vista Dr	Abrams Creek	7,200
4/19/2019	SSO - City of Winchester	110 Meade Dr	Abrams Creek	6,660
4/19/2019	SSO - City of Winchester	1850 Apple Blossom Dr	Abrams Creek	6,840
5/5/2019	SSO - City of Winchester	1950 South Pleasant Valley Rd	Abrams Creek	11,280
5/5/2019	SSO - City of Winchester	1850 Apple Blossom Dr	Abrams Creek	30,600
5/5/2019	SSO - City of Winchester	1726 Woodstock Ln	Abrams Creek	37,260
5/5/2019	SSO - City of Winchester	221 Alta Vista Dr	Abrams Creek	18,900
5/5/2019	SSO - City of Winchester	1933 Mall Blvd	Abrams Creek	15,255
5/5/2019	SSO - City of Winchester	Morningside Dr and Richards Ave	Abrams Creek	14,088
5/5/2019	SSO - City of Winchester	110 Meade Dr	Abrams Creek	11,505
5/5/2019	SSO - City of Winchester	620 Millwood Ave	Abrams Creek	3,975
5/5/2019	SSO - City of Winchester	1001 East Cork St	Abrams Creek	13,860
5/5/2019	SSO - City of Winchester	2537 Papermill Rd	Abrams Creek	5,040
5/5/2019	SSO - City of Winchester	901 Opequon Ave	Abrams Creek	3,360
5/5/2019	SSO - City of Winchester	Baker St and Cameron St	Abrams Creek	3,960
5/5/2019	SSO - City of Winchester	Green St and Battle Ave	Abrams Creek	4,320
5/5/2019	SSO - City of Winchester	Berryville Ave and Dunlap St	Abrams Creek	4,350
5/5/2019	SSO - City of Winchester	351 Capitol Ln	Hogue Run	Unknown (6.5 hours)
5/5/2019	SSO - City of Winchester	715 Battle Ave	Opequon Creek	Unknown (5.5 hours)
5/5/2019	SSO - City of Winchester	452 Superior Ave	Buffalo Lick Run	Unknown (6 hours)
1/25/2020	SSO - City of Winchester	351 Capitol Ln	Hogue Run	Unknown (4.5 hours)
1/25/2020	SSO - City of Winchester	1726 Woodstock Ln	Abrams Creek	1,080
1/25/2020	SSO - City of Winchester	1726 Woodstock Ln	Abrams Creek	810
2/7/2020	SSO - City of Winchester	1726 Woodstock Ln	Abrams Creek	675
2/7/2020	SSO - City of Winchester	1726 Woodstock Ln	Abrams Creek	4,680
2/7/2020	SSO - City of Winchester	1726 Woodstock Ln	Abrams Creek	2,880
2/7/2020	SSO - City of Winchester	221 Alta Vista Dr	Abrams Creek	9,750