

VIRGINIA WESTERN

Municipal Separate Storm Sewer System Annual Report

Roanoke, Virginia

Reporting Period: July 1, 2022 to June 30, 2023

Due Date: October 1, 2023

Revised per DEQ Comments: January 2, 2024

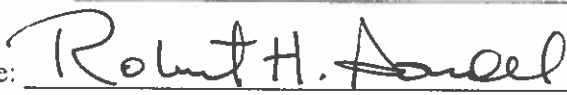
General Permit No. VAR040030

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Annual Report Certification

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Printed Name: Robert H. Sandel

Signature: 

Title: President

Date: 9/12/2023

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Background and Purpose

Virginia Western Community College (VWCC) owns and operates a municipal separate storm sewer system (MS4). The college’s MS4 consists of features such as curb and gutter, drop inlets, ditches, and stormwater management facilities to convey, treat, and ultimately discharge stormwater runoff to surface waters. The discharge of runoff from the MS4 is regulated under the Clean Water Act, as amended and pursuant to the State Water Control Law and Regulations adopted pursuant thereto. VWCC is authorized to discharge stormwater runoff from the campus’s MS4s under the Virginia Stormwater Management Program Regulations, Virginia Pollutant Discharge Elimination System Regulations (VPDES), and the Virginia State Water Control Law.

VWCC is authorized to discharge stormwater in accordance with the General VPDES Permit for Discharges of Stormwater from Small MS4s (General Permit). As required by the General Permit, VWCC has developed an MS4 Program Plan that describes the best management practices (BMPs) the college will implement to maintain compliance with the permit. The General Permit also requires VWCC to submit an annual report to the Virginia Department of Environmental Quality (DEQ) no later than October 1st of each year that reports on program implementation from July 1st of the previous year to June 30th of the current year. Consistent with the requirements of the General Permit, this report is annually completed as summarized in Table 1.

Table 1. General information required for annual reporting.

Required Information	Location in Report
Permittee, system name, and permit number	Cover Page
Reporting period	Cover Page
Signed Certification	Page ‘i’
Annual Reporting item(s) specified for each MCM	Provided for each BMP within the section entitled “Minimum Control Measure Annual Reporting.”
Evaluation of the program implementation, effectiveness, and necessary modifications	Provided for each BMP within the section entitled “Minimum Control Measure Annual Reporting.” Concerns regarding effectiveness are in Table 2 of the following Section.

Compliance Summary

Reported information is consistent with the specific annual reporting required in the General Permit and the VWCC MS4 Program Plan, including supplemental information described in the Program Plan to measure effectiveness of each BMP. For use in reference to this annual report, the MS4 Program Plan is provided at the VWCC stormwater management [webpage](#). The Program Plan may be updated or revised from time to time as part of an iterative process to reduce pollutant loadings and protect water quality to the maximum extent practicable (MEP). VWCC has evaluated the effectiveness of each program BMP, as described in the Program Plan. Table 2 summarizes the evaluation to determine if any modifications to the Program Plan are necessary for the subsequent reporting year. If deemed ineffective, please see the reporting for the specific BMP for intended modifications.

Table 2. Evaluation summary for each BMP for the reporting year.

BMP # ¹	Description Summary ¹	Effective
1A	Public Education & Outreach	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No
2A	Maintain dedicated webpage	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No
2B	Receive/respond to public reports/input	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No
2C	Public Participation Activities	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No
3A	MS4 Map and Information Table	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No
3B	Prohibition of non-stormwater discharges	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No
3C	Perform dry weather outfall screenings	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No
4A	Implement VCCS Stnds. & Specs for ESC & SWM	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No
4B	Control Non-stormwater discharges (construction)	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No
5A	Implement VCCS Stnds. & Specs for ESC & SWM	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No
5B	Conduct annual SWM Facility Inspections	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No
5C	Update SWM Facility Spreadsheet	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No
5D	Report to DEQ Construction Stormwater Database	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No
6A	Implement Good Housekeeping Procedures	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No
6B	Conduct annual campus-wide SWPPP Evaluation	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No
6C	Maintain Current Nutrient Management Plan	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No
6D	Ensure contract language for controls	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No
6E	Conduct MS4 employee training	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No
SC1	Roanoke River Sediment TMDL Action Plan	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No
SC2	Roanoke River, Ore Brach Bacteria TMDL Action Plan	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No

¹ Refer to BMP section within the program plan for full description and requirements for each BMP.

Minimum Control Measure Annual Reporting

Reporting provided for each BMP described in the VWCC MS4 Program Plan to address each MCM is provided below. Information provided is only that explicitly required by the General Permit and the VWCC MS4 Program Plan. Please refer to the Program Plan for additional information for each BMP.

MCM 1: Public Education and Outreach

Annual reporting required for each BMP to address MCM 1, as described in the General Permit and MS4 Program Plan, is provided below.

BMP 1A – Public Education & Outreach Plan

Annual reporting associated with this BMP requires:

- ✓ A list of the high-priority stormwater issues addressed during the reporting year (Table 1A-1).
- ✓ A list of the strategies used to communicate each high-priority stormwater issue (Table 1A-1).
- ✓ The public survey results described for use as a measure of effectiveness (Table 1A-2).

Table 1A-1. Reporting for high priority stormwater issues addressed during the reporting year.

High Priority Stormwater Issue	Strategy
<i>1. General public education on: (1) stormwater impacts to surface waters and (2) steps to reduce pollution.</i>	<i>Traditional Written Materials (Brochure)</i>
<i>2. Illicit discharge prohibition/enforcement on the VWCC campus disciplinary implications, hazards and proper waste disposal.</i>	<i>Media Materials (Closed circuit TV slides)</i>
<i>3. Increase applicable staff's knowledge regarding pollutants of concern for the Chesapeake Bay TMDL.</i>	<i>Traditional Written Materials (Brochure)</i>

Table 1A-2. Public survey results used for measure of effectiveness.

Results from Public Survey
<i>As two-year colleges, biennial public surveys to measure the impact of the public education and outreach programs are conducted by 8 VCCS colleges with similar programs (> 1,000 participants). During the permit cycle, results have showed a slight increase in average survey scores that measure program knowledge every two years: 73.2% (2019), 73.2% (2021), 75.8% (2023).</i>

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

MCM 2: Public Involvement and Participation

Annual reporting required for each BMP to address MCM 2, as described in the General Permit and MS4 Program Plan, is provided below.

BMP 2A – Dedicated MS4 Webpage

Annual reporting associated with this BMP requires:

- ✓ The current VWCC MS4 Program and stormwater pollution prevention webpage address and a description of updates implemented within the reporting year. A description of updates implemented to the webpage within the reporting year; and
- ✓ Indication of the completion of an annual review of the webpage to ensure the required information to be posted is maintained and up to date.

Table 2A-1. Reporting for high priority stormwater issues addressed during the reporting year.

Dedicated Stormwater Webpage Reporting	
Link to current MS4 Program and Stormwater pollution prevention webpage: https://www.viriniawestern.edu/fpd/stormwater-management/	
An annual review of the website conducted to ensure all information required to be posted on the website was performed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Description of updates implemented during the reporting year: <i>VWCC added the latest MS4 annual report, as required by the General Permit, during the reporting year.</i>	

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

BMP 2B – Procedures for Receipt/ Response to Public Reports/Input

Annual reporting associated with this BMP requires:

- ✓ Each potential illicit discharge report and percentage of reports closed;
- ✓ Each instance of public input and percent for which VWCC provided response; and
- ✓ Assessment if all illicit discharges were not closed or all input did not receive response.

Illicit Discharge Reports¹		
Number of instances: <i>1</i>	Number of instances closed: <i>1</i>	Percent of instances closed: <i>100%</i>
Public Input on Program Plan²		
Number of instances: <i>0</i>	Number of responses: <i>N/A</i>	Percent of instances responded to: <i>N/A</i>

¹ Illicit discharge reports are provided in Appendix A, if > zero instances.

² Public input and response documentation is in Appendix B, if > zero instances.

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

BMP 2C – Public Involvement/Participation Activities

Annual reporting associated with this BMP requires:

- ✓ A description of the activities;
- ✓ A report of the metric to measure the benefit to water quality; and
- ✓ An evaluation as to whether or not the activity is beneficial to improving water quality.

Public Involvement/Participation Activities			
Involvement Type¹	Description of activity²	Metric to measure benefit to water quality	Beneficial to water quality?
<i>Disposal or collection events</i>	<i>Campus-wide recycling program (ongoing)</i>	<i>5,580 lbs. of paper and 2,312 lbs of plastic recycled during the reporting period</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>Educational Events (11/18/23)</i>	<i>VWCC promoted, hosted & participated in the Clean Valley Council 23rd Annual Earth Summit</i>	<i>Environmental-focused event was well attended. (See Weblink in description)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>Pollution prevention (2/6/23)</i>	<i>Implementation and maintenance of storm drain marker program.</i>	<i>All 97 markers inspected, with 4.1% needing replacement. Markers will be replaced, along with new inlets receiving initial markers during the 2023-2024 reporting period.</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>Educational Events (10/25/22 and 3/20/23)</i>	<i>Committee Member Participation on Regional Stormwater Advisory Committee.</i>	<i>10/25/22 - Topics regarding stormwater projects, public outreach & grants. 3/20/23 - Discussed regional SWM projects w/ site visits.</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

¹ A minimum of two involvement types must be used annually.

² VWCC did not rely on any other MS4 permittees for any of the listed activities.

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

MCM 3: Illicit Discharge Detection and Elimination

Annual reporting required for each BMP to address MCM 3, as described in the General Permit and MS4 Program Plan, is provided below.

BMP 3A – Maintain MS4 Map and Information Table

Annual reporting associated with this BMP requires:

- ✓ A confirmation statement that the MS4 map and information table have been updated to reflect any changes to the MS4 occurring on or before June 30th of the reporting year;

Certification Statement: MS4 Map & Information Table Updates	Confirm?
<p><i>“In accordance with the General Permit and the VWCC Program Plan, VWCC confirms as part of this annual report that the MS4 map and information table have been updated to reflect any changes to the MS4 occurring during the reporting year.”</i></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

BMP 3B – Prohibition of Unauthorized Non-stormwater Discharges

Annual reporting associated with this BMP includes reporting requirements for BMP 3C, in addition to the following:

- ✓ The number of illicit discharges purposefully caused by a member of the VWCC public;
- ✓ An assessment, when applicable, of any disciplinary action in context to the protection of water quality.

Illicit Discharge Prohibition Enforcement		
(If applicable, instances are added below of illicit discharges purposefully caused by the VWCC Public)		
No. <input type="button" value="Add Instance"/>	Disciplinary action taken? (Yes / No)	Description of action taken
Total number of instances for current reporting year.	<i>1</i>	
Total number of instances for last reporting year.	<i>1</i>	
Total number of instances two years previous.	<i>0</i>	
Total number of instances three year prior.	<i>0</i>	
Does trend indicate the BMP is ineffective?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

BMP 3C – Maintain, Implement, Enforce IDDE Written Procedures (Includes Screening)

Annual reporting associated with this BMP requires:

- ✓ The total number of outfalls screened during the reporting period as part of the dry weather screening program; and
- ✓ A list of illicit discharges to the MS4 including spills reaching the MS4. Each instance of illicit discharge will be documented using the “IDDE Tracking Form” in the *VWCC Staff Handbook of Good Housekeeping and Pollution Prevention* to include the following information:
 - The source of illicit discharge;
 - The dates that the discharge was observed, reported, or both;
 - Whether the discharge was discovered by the permittee during dry weather screening, reported by the public, or other method (describe);
 - How the investigation was resolved;
 - A description of any follow-up activities; and
 - The date the investigation was closed.
- ✓ An annual assessment of the percentage of detected illicit discharges that are eliminated, including any necessary modification(s) needed in the *VWCC Staff Handbook of Good Housekeeping and Pollution Prevention* for cases where a detected illicit discharge was not eliminated. A schedule for completing any modification will also be provided.

Outfall Screening & IDDE Procedure Effectiveness	
Total number of outfalls screened as part of dry weather screening program.	3
Total number of VWCC outfalls.	3
Were 100% of outfalls screened during the reporting year?	Yes

Effectiveness Assessment for Addressing Illicit Discharges	
Were all instances of identified illicit discharge listed in Appendix A closed?	Yes

MCM 4: Construction Site Stormwater Runoff Control

Annual reporting required for each BMP to address MCM 4, as described in the General Permit and MS4 Program Plan, is provided below.

BMP 4A – Address Discharge from Regulated Construction Site Stormwater Runoff

Annual reporting associated with this BMP requires:

- ✓ A confirmation statement, as a result of the annual assessment for effectiveness of the BMP, that land disturbing projects that occurred during the reporting period have been conducted in accordance with the current DEQ-approved standards and specifications for ESC.
 - If one or more of the land disturbing projects were not conducted with the DEQ-approved standards and specifications, an explanation as to why the projects did not conform to the approved standards and specifications.
- ✓ Total number of ESC inspections conducted; and
- ✓ The total number and type of enforcement actions implemented and the type of enforcement actions.

Certification Statement: Adherence to the VCCS Standards & Specifications for ESC	
<i>“In accordance with the General Permit and the VWCC Program Plan, VWCC confirms that land disturbing projects that occurred during the reporting period have been conducted in accordance with the latest DEQ-approved standards and specifications for Erosion and Sediment Control.”</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

ESC Inspections & Enforcement Summary	
Total number of ESC inspections conducted: <i>VWCC Pavement Rehabilitation, Phase 2 project – 30 ESC inspections during reporting period.</i>	
Were any enforcement actions taken during the reporting year?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

BMP 4B –Controls to Prevent Non-stormwater Discharges during Land Disturbance

Annual reporting associated with this BMP requires:

- ✓ The total number of illicit discharge(s) originating from land disturbance activity of the total illicit discharge reports listed in Appendix A; and
- ✓ Any potential changes to the subsequent annual standards and specifications to prevent future occurrences.

Illicit Discharge from Land Disturbance Activity	
Were there any instances during the reporting period of illicit discharges originating from land disturbance activity?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

MCM 5: Post-construction SWM for Development

Annual reporting required for each BMP to address MCM 5, as described in the General Permit and MS4 Program Plan, is provided below. Please refer to the VWCC MS4 Program Plan for specific BMP information.

BMP 5A – Address Post-construction Stormwater Runoff

Annual reporting associated with this BMP requires:

- ✓ A confirmation statement that land disturbing projects that occurred during the reporting period have been conducted in accordance with the current DEQ-approved standards and specifications for SWM.

Certification Statement: Adherence to the VCCS Standards & Specifications for SWM	
<p><i>“In accordance with the General Permit and the VWCC Program Plan, VWCC confirms that land disturbing projects that occurred during the reporting period have been conducted in accordance with the latest DEQ-approved standards and specifications for Stormwater Management.”</i></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
<p>Does the measure of BMP effectiveness require Program Plan modification?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

BMP 5B – Implement Inspection & Maintenance Program for SWM Facilities

Annual reporting associated with this BMP requires:

- ✓ The total number of inspections (completed forms) conducted on each of VWCC’s SWM facilities;
- ✓ A description of the significant maintenance, repair, or retrofit activities performed on each SWM facility, if any, to ensure it continues to perform as designed. This does not include routine activities such as grass mowing or trash collection; and
- ✓ Summary of timelines for addressing any significant maintenance identified during inspections.

SWM Facility Inspections and Maintenance	
Total number of inspections conducted on SWM facilities for the reporting year is: <i>17</i>	
Was at least one inspection performed on each VWCC SWM facility during the reporting year?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were any significant maintenance, repair, or retrofit activities necessary to ensure the BMP performs as designed as a result of inspection?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

BMP 5C – Maintain SWM Facilities Spreadsheet

No annual reporting necessary (see reporting for BMP 5D)

BMP 5D –SWM Facilities Reporting to DEQ

Annual reporting associated with this BMP requires:

- ✓ A confirmation statement that either: (1) VWCC submitted SWM facility information through the Virginia Construction Stormwater General Permit database for those land disturbing activities for which coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities was required or (2) VWCC did not complete any projects requiring coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities.
 - If information was not submitted, an explanation as to why with a schedule for submission of the required information.
- ✓ A confirmation statement that VWCC electronically reported, no later than the submission date of this annual report, SWM facilities and BMPs implemented between July 1 and June 30 using the DEQ BMP Warehouse that were installed to control post-development stormwater runoff from land disturbing activities less than one acre in accordance with the Chesapeake Bay Preservation Act regulations (9VAC25-830) and for which a General VPDES Permit for Discharges of Stormwater from Construction Activities was not required and the date on which the information was submitted.
 - If information was not submitted, an explanation as to why with a schedule for submission of the required information.

Certification Statement: Report to Virginia Construction Stormwater General Permit Database (Not Applicable for Reporting Year – Project w/ New Facilities Completed 2023/2024)	
<i>“VWCC submitted SWM facility information through the Virginia Construction Stormwater General Permit database for those land disturbing activities for which coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities was required in accordance with the VCCS Standards and Specifications for ESC and SWM.”</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Certification Statement: Report to Virginia Construction Stormwater General Permit Database (Not Applicable for Reporting Year)	
<i>Confirmation Statement: “VWCC either did not complete any projects during the reporting period requiring coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities; or, if a project was completed, a stormwater management facility was not installed as part of the project.”</i>	Marked box below is confirmation <input checked="" type="checkbox"/>

BMP 5D –SWM Facilities Reporting to DEQ (continued)

Certification Statement: Reporting to the DEQ BMP Warehouse	
<p>Confirmation Statement: <i>“VWCC reported, prior to submission of this annual report, stormwater management facilities and BMPs implemented between July 1 and June 30 of the reporting period using the DEQ BMP Warehouse that were installed to control post-development stormwater runoff from land disturbing activities less than one acre in accordance with the Chesapeake Bay Preservation Act regulations (9VAC25-830) and for which a General VPDES Permit for Discharges of Stormwater from Construction Activities was not required.”</i></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Certification Statement: Report to Virginia Construction Stormwater General Permit Database	
<p>Confirmation Statement: <i>“VWCC did not install new SWM facilities and BMPs during the reporting period to control post-development stormwater runoff from land disturbing activities less than one acre in accordance with the Chesapeake Bay Preservation Act regulations (9VAC25-830) and for which a General VPDES Permit for Discharges of Stormwater from Construction Activities was not required”</i></p>	<p>Marked box below is confirmation</p> <input checked="" type="checkbox"/>
Summary of BMP Effectiveness based on Program Plan Measurable Goal	
<p>Does the measure of BMP effectiveness require Program Plan modification?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

MCM 6: Pollution Prevention & Good Housekeeping for Facilities

Annual reporting required for each BMP to address MCM 6, as described in the General Permit and MS4 Program Plan, is provided below. Please refer to the VWCC MS4 Program Plan for specific BMP information.

BMP 6A –Written Procedures for Pollution Prevention/Good Housekeeping

Annual reporting associated with this BMP requires:

- ✓ A description of any illicit discharges originating from campus operations and maintenance activities, provided in reporting for BMP 3C; and
- ✓ A summary of any modifications to operational procedures in the *VWCC Staff Handbook of Good Housekeeping and Pollution Prevention* to prevent future occurrences of illicit discharge(s), if applicable.

Effectiveness of Program to Prevent Illicit Discharges from Campus Operations	
Were there any illicit discharges from BMP 3C reporting that originated from campus operations of maintenance activities?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Since “No” answered above, there were no modifications to operational procedures in the <i>VWCC Staff Handbook of Good Housekeeping and Pollution Prevention</i> to prevent future occurrences of illicit discharge(s).	

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program plan modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

BMP 6B –SWPPPs for High Priority/ High Potential Facilities for Discharging Pollutants

Annual reporting for this BMP requires a summary of the annual campus assessment to determine if a SWPPP is required based on the criteria described in the General Permit that defines high priority facilities that have high potential of discharging pollutants.

Annual Campus SWPPP Assessment Results	
Was an annual evaluation to determine if a SWPPP is required performed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, is a SWPPP required?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

BMP 6C – Maintain/ Implement Nutrient Management Plans and Deicing Policy

Annual reporting for this BMP will include a summary of any new Nutrient Management Plan developed, including

- ✓ Locations and total acreage for where the NMP applies; and the
- ✓ Date of the latest DCR approval for the NMP.

Nutrient Management	
Did VWCC apply nutrients during the reporting year?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>VWCC has, and implements, a Nutrient Management Plan for a total of 22.8 acres of turf on the campus that was approved by the Department of Conservation and Recreation on August 24, 2021 and is valid through June 28, 2024.</i>	

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

BMP 6D – Contractor Requirements to Utilize Controls to Minimize Pollutant Discharges

Annual reporting for this BMP requires:

- ✓ The number of illicit discharges originating from contractor activities.
- ✓ Summary of assessment to modify procurement procedures or the *VWCC Staff Handbook of Good Housekeeping and Pollution Prevention* to prevent future instances.

BMP 6A Annual Reporting Form	
Were there any illicit discharges during the reporting period that originated from contractor activities?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program plan modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

BMP 6E – Training Plan for Applicable Employees

Annual reporting associated with this BMP requires:

- ✓ The date of the most recent training event;
- ✓ The date of the prior training event (to ensure within 24 months);
- ✓ The number of employees who attended the most recent training event;
- ✓ The objective of the training event; and
- ✓ The average quiz scores from the training event. If quiz scores average less than 80%, a summary will be report of the assessment of the training event with any necessary modifications to be incorporated into future training to improve teaching of the materials.

Good Housekeeping/Pollution Prevention Training	
Date of latest training event:	<i>February 16, 2023</i>
Date of previous training:	<i>February 17, 2021</i>
Has training continued to be provided a minimum of once every 24 months?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Number of employees that attended the latest training event.	<i>11</i>
Number of employees identified to be required to participate in training (as defined by the general permit and program plan).	<i>11</i>
Percent of those identified that attended training.	<i>100%</i>
Did the percentage of those identified to be required to attend training attend?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
A description of the objective of the latest training event: <i>Familiarize staff with recognition and reporting of illicit discharges, practices during road, street, and parking lot maintenance, housekeeping wastewater management, TMDLs, and spill response.</i>	
Average quiz score from latest training event.	<i>89.4%</i>
Average quiz score from previous training.	<i>87.0%</i>

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program plan modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Special Conditions for Total Maximum Daily Load Waste Load Allocations

Annual reporting required for each BMP to address Special Conditions for TMDLs, as described in the General Permit, is provided below.

BMP SC1 – Roanoke River Benthic TMDL Action Plan

Annual reporting associated with this BMP requires annually providing a status report on the implementation of the Action Plan with a summary of actions conducted during the reporting period to implement the action plan, provided below:

Roanoke River Benthic TMDL Action Plan Status Report			
<p><i>A total of 0.7 tons of sweepings was collected for the reporting period. Equivalent TSS reductions are based on results of sampling of swept material by MS4s statewide, including other VCCS MS4 permittees, as presented by Hixon and Dymond (2019) in the manuscript entitled, “Characterization of Street Sweeping Material for Addressing Total Maximum Daily Load Allocations” as published by the ASCE Journal of Sustainable Water in the Built Environment. DOI: 10.1061/JSWBAY.0000882. The Hixon and Dymond (2019) values continue to be refined with a growing database from continued sampling conducted by VWCC and other VCCS colleges. Median value for TSS-associated particles in swept materials is 39.7% when rain has occurred within 2-days and 65.4% when no rain for greater than two days. These values incorporate a mean moisture content of 2.2% (Hixon & Dymon, 2019) for conversion of total mass swept to a dry weight. The dry mass is then converted to the mass of material with particle sizes associated with TSS (< 841 μm). As a direct measure of effectiveness, VWCC conducted particle size distribution on 4 collected samples from swept material during the reporting year, which yielded an average TSS-associated particle size of 57% (consistent with no rain for greater than two days and results from previous year). Sweeping of parking lots occurred in October 2022 and May 2023. The October sweepings were performed on a weekend and the vendor neglected to provide the mass swept. As a result, reductions achieved are underestimated and much lower than previous reporting periods. Result of the annually swept material that was tracked in the spring provided below. VWCC will monitor/track fall 2023 sweeping and adjust sweeping frequency as needed for the remainder of the reporting year in an effort to achieve the annual target.</i></p>			
Pollutant	Annual Reductions Required (tons/yr)	Reductions achieved this reporting year (tons) (Hixon & Dymond study)	Reductions achieved this reporting year (tons) (Sampled Swept Material)
Sediment (TSS)	4.33	0.46	0.40
Are reductions progressing to maintain targets?		Yes – but down this year due to tracking	
Were any modifications made to the action plan?		No	

BMP SC2 – Roanoke River, Wilson Creek, and Ore Branch Bacteria TMDL Action Plan

Annual reporting associated with this BMP requires annually providing a status report on the implementation of the Action Plan with a summary of actions conducted during the reporting period to implement the action plan, provided below:

Roanoke River, Wilson Creek, and Ore Branch Bacteria TMDL Action Plan Status Report	
<p><i>The VWCC Bacteria Action Plan, updated April 15, 2020, in accordance with the current MS4 General Permit, requires VWCC select and implement one strategy from Table 5 of the MS4 General Permit (Strategies for Bacteria Reduction Stormwater Control/Management). During this reporting period, and as described in the latest VWCC Bacteria Action Plan, biannual inspections of dumpster areas for potential issues, including bacteria-laden illicit discharges are selected as the strategy to address the TMDL. Dumpster inspections were conducted in February and May, 2023, for all dumpster locations. Inspections utilize a VWCC-developed protocol/inspection form that was completed for the dumpster locations. Items identified, such as open lids or potential leaks suspected from pavement staining, have been addressed. Dumpsters were replaced and lids provided for roll-a-way dumpsters in the previous year. Staff training also discusses the importance of closing dumpster lids.</i></p>	
Is the Action plan being implemented?	Yes
Were any modifications made to the action plan?	No
Plan Updates: <i>No changes.</i>	

Appendix A – Illicit Discharge Report

ILLCIT DISCHARGE INVESTIGATION FORM

1) Date potential, suspect or obvious Illicit Discharge observed or reported: September 21, 2022

2) Initial Characterization (as identified on screening form):
 Potential Suspect Obvious None (reported)

3) Description of the potential, suspect or obvious Illicit Discharge:
Vehicle antifreeze observed & reported by VWCC staff as potential illicit discharge during daily activities
Method of discovery could be considered result of good housekeeping/pollution prevention training

4) Date of the start of the investigation: September 21, 2022 at approximately 1:47pm

5) Investigation methods and findings:
Visual Inspection. Discharge was vehicle antifreeze as a result of vehicle accident. Approximately +/- 1 gallon.

6) Was the discharge eliminated (resolved)?
 Yes No

7) If “Yes” answered in Item # 6, provide the resolution to eliminate the discharge:
Discharge was addressed by FMS staff utilizing approximately 2-3lbs of absorbant.

8) If “No” answered in Item # 6, described the reasons:

9) Are any addition follow up action necessary (i.e. the discharge anticipated to recur)?
 Yes No

10) If yes, describe follow up actions with a timeline to perform the actions.

*** Please attach supporting documentation to this form to support the responses provided, as applicable. If the investigation was initiated from a dry-weather outfall screening, attached the associated Outfall Reconnaissance Form. Maintain form and documentation in files.***