



Midlothian and Chester Campuses

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# Municipal Separate Storm Sewer System Program Plan

For

General Permit No. VAR040110

During

Permit Years 2023 - 2028

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

June 2025

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## ACRONYMS

BMP	Best Management Practice
BCC	Brightpoint Community College
DCR	Virginia Department of Conservation and Recreation
DEQ	Virginia Department of Environmental Quality, “the department”
CUA	Census Urbanized Area/Census Urban Area
ESC	Erosion and Sediment Control
HUC	Hydrologic Unit Code
MEP	Maximum Extent Practicable
MCM	Minimum Control Measure
MS4	Municipal Separate Storm Sewer System
NMP	Nutrient Management Plan
POC	Pollutants of Concern
PCB	Polychlorinated biphenyl
SLAF	Stormwater Local Assistance Fund
SWM	Stormwater Management
SWPPP	Stormwater Pollution Prevention Plan
TMDL	Total Maximum Daily Load
VCCS	Virginia Community College System
VCCS S&S	Virginia Community College System Standards and Specifications
VPDES	VAR04 General Virginia Pollutant Discharge Elimination System Permit for Discharges of Stormwater from Small Municipal Separate Storm Sewer Systems
VCACS	Virginia Department of Agriculture and Consumer Services
VESCP	Virginia Erosion and Sediment Control Program
VSMA	Virginia Stormwater Management Act
VSMP	Virginia Stormwater Management Program
WLA	Waste Load Allocation

## **DEFINITIONS**

"Annual practice" means a nonstructural best management practice such as street or storm drain cleaning that reduces pollution for one compliance year upon implementation.

"Best management practice" means schedules of activities, prohibitions of practices, including both structural and nonstructural practices, maintenance procedures, and other management practices to prevent or reduce the pollution of surface waters and groundwater systems from the impacts of land-disturbing activities.

"Chesapeake Bay TMDL Pollutants of concern" or "POC" means total nitrogen and total phosphorus.

"Chesapeake Bay Preservation Act land-disturbing activity" means a land-disturbing activity including clearing, grading, or excavation that results in a land disturbance equal to or greater than 2,500 square feet and less than one acre in all areas of jurisdictions designated as subject to the Chesapeake Bay Preservation Area Designation and Management Regulations (9VAC25-830) adopted pursuant to the Chesapeake Bay Preservation Act.

"Chesapeake Bay Watershed" means all land areas draining to the following Virginia river basins: Potomac River Basin, James River Basin, Rappahannock River Basin, Chesapeake Bay and its small coastal basins, and York River Basin.

"Construction activity" means any clearing, grading or excavation associated with large construction activity or associated with small construction activity.

"Date brought online" means the date when BCC determines that a new stormwater management facility is properly functioning.

"Discharge," when used without qualification, means the discharge of a pollutant.

"Drainage area" means a land area, water area, or both from which runoff flows to a common point.

"Ecosystem restoration projects" means practices implemented to reestablish and maintain natural systems that prevent, reduce, or remediate pollutant loadings. Examples of ecosystem restoration projects include stream restoration, shoreline restoration, land-use conversion, and reforestation.

"Existing sources" means pervious and impervious urban land uses served by the MS4 as of June 30, 2009.

"High-priority facilities" means facilities owned or operated by BCC with drainage to any permitted MS4 that actively engage in one or more of the following activities: (i) composting; (ii) equipment storage, cleaning, and maintenance; (iii) long-term bulk materials storage; (iv) pesticide, herbicide, and fertilizer storage; (v) recycling; (vi) anti-icing and deicing agent storage, handling, and transfer; (vii) solid waste handling and transfer, and (viii) permittee owned or operated vehicle washing, maintenance, and salvage." Hydrologic Unit Code" means a watershed unit established in the most recent version of Virginia's 6th Order National Watershed Boundary Dataset.

"Illicit discharge" means any discharge to a municipal separate storm sewer that is not composed entirely of stormwater, except discharges resulting from firefighting activities (Discharges or flows from firefighting activities need only be addressed where they are identified as significant sources of pollutants to surface waters.), water line flushing, landscape irrigation, diverted stream flows, rising groundwaters, uncontaminated groundwater infiltration, uncontaminated pumped groundwater, discharges from potable water sources, foundation drains, air conditioning condensation, irrigation water, springs, water from crawl space pumps, footing drains, lawn watering, individual residential car washing, flows from riparian habitats and wetlands, dechlorinated swimming pool discharges, street wash water, noncommercial fundraising car washes if the washing uses only biodegradable, phosphate-free, water-based cleaners; or other activities generating discharges identified by the department as not requiring VPDES authorization.

"Impervious cover" means a surface composed of material that significantly impedes or prevents natural infiltration of water into soil.

"Land disturbance" or "land-disturbing activity" means a manmade change to the land surface that potentially changes its runoff characteristics including clearing, grading, or excavation, except that the term shall not include the following potential activities:

- Land-disturbing activities that disturb less than 2,500 square feet in all areas of the jurisdictions designated as subject to the Chesapeake Bay Preservation Act or activities that are part of a larger common plan of development or sale that is one acre or greater of disturbance;
- Routine maintenance that is performed to maintain the original line and grade, hydraulic capacity, or original construction of the project. The paving of an existing road with a compacted or impervious surface and reestablishment of existing associated ditches and shoulders shall be deemed routine maintenance;
- Land-disturbing activities in response to a public emergency where the related work requires immediate authorization to avoid imminent endangerment to human health or the environment. In such situations, DEQ shall be advised of the disturbance within seven days of commencing the land-disturbing activity, and compliance with the administrative requirements within 30 days of commencing the land-disturbing activity.

"Municipal separate storm sewer system" means a conveyance or system of conveyances including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains.

"MS4 Program Plan" means the completed registration statement and all approved additions, changes and modifications detailing the comprehensive program implemented by the operator under this state permit to reduce the pollutants in the stormwater discharged from its municipal separate storm sewer system (MS4) that has been submitted and accepted by DEQ.

"MS4 regulated service area" or "service area" means for Phase II permittees, the drainage area served by the permittee's MS4 that is located within the 2020 census urban areas with a population of at least 50,000 or the 2000 and 2010 decennial censuses urbanized area as determined by the Bureau of the Census. MS4 regulated service area may also be referred to as "served by the MS4" as it pertains to the tables in Part II.A of this permit.

"New sources" means pervious and impervious urban land uses served by the MS4 developed or redeveloped on or after July 1, 2009.

"Nontraditional MS4 permittee" or "nontraditional permittee" means a government entity that operates a regulated MS4 that is not under the authority of a county board of supervisors, a city council, or a town council.

"Outfall" means, when used in reference to municipal separate storm sewers, a point source at the point where a MS4 discharges to surface waters and does not include open conveyances connecting two municipal separate storm sewers, or pipes, tunnels or other conveyances which connect segments of the same stream or other surface waters and are used to convey surface waters.

"Physically interconnected" means that one MS4 is connected to a second MS4 in such a manner that it allows for direct discharges to the second system.

"Pollutants of concern" means pollutants specifically identified in a U.S. Environmental Protection Agency approved total maximum daily load report as causing a water quality impairment.

"Public" means, for the purpose of this Program Plan, the students, faculty, and staff population attending or employed by Brightpoint Community College.

"Point of discharge" means a location at which concentrated stormwater runoff is released.

"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.

"Stormwater" means precipitation that is discharged across the land surface or through conveyances to one or more waterways and that may include stormwater runoff, snow melt runoff, and surface runoff and drainage.

"Stormwater management plan" means a document(s) containing material for describing methods for complying with the requirements of the Virginia Stormwater Management Program.

"Total maximum daily load" means the sum of the individual wasteload allocations for point sources, load allocations for nonpoint sources, natural background loading and a margin of safety. TMDLs can be expressed in terms of either mass per time, toxicity, or other appropriate measure. The TMDL process provides for point versus nonpoint source trade-offs.

"Transitional sources" means regulated land disturbing activities that are temporary in nature and discharge through the MS4.

"Wasteload allocation" or "wasteload" means the portion of receiving surface water's loading or assimilative capacity allocated to one of its existing or future point sources of pollution. WLAs are a type of water quality-based effluent limitation.

"Watershed" means a defined land area drained by a river or stream, karst system, or system of connecting rivers or streams such that all surface water within the area flows through a single outlet.

## **1.0 MS4 PROGRAM PLAN**

This Program Plan when implemented by Brightpoint Community College (BCC) constitutes compliance with the standard of reducing pollutants to the maximum extent practicable (MEP) of the VAR04 General Virginia Pollutant Discharge Elimination System (VPDES) Permit for Discharges of Stormwater from Small Municipal Separate Storm Sewer Systems (MS4s), referred to in the remainder of this Plan as the General Permit.

### **1.1 Minimum Control Measures**

The General Permit requires the Program Plan to include Best Management Practices (BMP) to address the requirements of six minimum control measures (MCMs) described in Part I.E of the General Permit.

The MCMs are summarized as:

- MCM 1: Public Education and Outreach on Stormwater Impacts
- MCM 2: Public Involvement and Participation
- MCM 3: Illicit Discharge Detection and Elimination
- MCM 4: Construction Site Stormwater Runoff Control
- MCM 5: Post-construction Stormwater Management
- MCM 6: Pollution Prevention/Good Housekeeping for Operations

Section 3.0 of this Program Plan includes BMPs developed to explicitly address the General Permit requirements for each MCM. The title of each BMP is followed with a reference to the corresponding permit section. Each BMP included in the Program Plan is intended to specifically address permit requirements and includes the following information described in Part I.C of the General Permit:

- The roles and responsibilities of each of BCC's divisions and departments in the implementation of the requirements of the permit tasked with ensuring that the permit requirements are met (Part I.C.1.a);
- Whether BCC utilizes another entity to implement portions of the MS4 Program, and a copy of the written agreement. The description of each party's roles and responsibilities, including any written agreements with third parties, shall be updated as necessary (Part I.C.1.b);
- For each MCM in Part I.E, the following information shall be included (Part I.C.1.c):
  - Each specific requirement as listed in Part I.E for each MCM (Part I.C.1.c.(1));
  - A description of the BMPs or strategies that BCC anticipates will be implemented to demonstrate compliance with the permit conditions in Part I.E (Part I.C.1.c.(2));
  - All standard operating procedures or policies necessary to implement the BMPs (Part I.C.1.c.(3));
  - The measurable goal by which each BMP or strategy will be evaluated (Part I.C.1.c.(4)); and
  - The persons, positions, or departments responsible for implementing each BMP or strategy (Part I.C.1.c.(5)); and
- A list of documents incorporated by reference including the version and date of the document being incorporated (Part I.C.1.d).

### **1.2 Special Conditions for TMDLs (Part II A, B & C)**

BCC is subject to the Special Conditions for the Chesapeake Bay TMDL that requires the development and submission to DEQ, a third phase TMDL Action Plan in accordance with Table 1. A BMP is provided in Section 3.1 for development of the Action Plan, and a second BMP is developed for implementation of the Action Plan.

In accordance with Table 1, BMPs are also provided to ensure BCC determines if a wasteload allocation (WLA) has been assigned to BCC within an approved TMDL and to provide public opportunity for participation in development of new TMDL Action Plans and revisions to existing TMDL Action Plans.

BCC is subject to the Special Conditions of the James River Tidal Bacteria TMDL that requires an update to the previously developed local TMDL Action Plan on the progress made toward achieving local TMDL action plan goals and the anticipated end date by which BCC will meet the wasteload allocation in accordance with the deadline provided Table 1.

No additional TMDLs have been approved by the EPA between July 1, 2018, and June 30, 2023, applicable to BCC, therefore BCC is not required to develop or implement any TMDL action plans beyond those previously discussed.

### **1.3 Roles and Responsibilities (Part I.C.1.a & b)**

Each BMP lists the individual(s) responsible for implementation. At BCC, the Director of Facilities and Safety implements the MS4 Program Plan and reports to the Vice President for Finance and Administrative Services who is the signatory authority in accordance with Part IV.K. The Vice President reports to the President of the College who reports to the Chancellor of the Virginia Community College System. BCC utilizes the Virginia Community College System (VCCS) to implement portions of the MS4 Program Plan, specifically MCM 4 concerning land disturbing activities. The VCCS Standards and Specification DEQ approval letter is provided in Appendix B (Part I.C.1.b). The VCCS is BCC's ESC and VSMP plan approving authority. The VCCS implements Standards and Specifications approved by DEQ which are incorporated by reference. See Section 1.5 for the list of the most recent date of the VCCS Standards and Specification.

### **1.4 Program Modifications (Part I.C.3 & 4)**

BCC shall update the MS4 program plan to meet the requirements of this permit no later than six months (May 1, 2024) after the effective date of this permit unless otherwise specified in another permit condition (Part I.C.3) and shall post the most up-to-date version of MS4 program plan on the BCC's website or location where the MS4 program plan can be obtained as required by Part I.E.2 within 30 days (June 1, 2024) of updating the MS4 program plan (Part I.C.4). Revisions to the MS4 program plan are expected throughout the life of this permit as part of the iterative process to reduce pollutant loading and protect water quality to the MEP. As such, revisions made in accordance with this permit as a result of the iterative process do not require modification of this permit. BCC shall summarize revisions to the MS4 program plan as part of the annual report as described in Part I.D.3 (Part I.C.5).

### **1.5 List of Reference Materials (Part I.C.1.d)**

The list of documentation below is incorporated into the Program Plan via reference along with any associated maps and forms, where applicable. All necessary documents for implementation not listed here, not provided in the MS4 Program Plan, and may or may not be provided in the annual reports are retained on file for a minimum of 3 years and are available upon request.

- Illicit Discharge Detection and Elimination Manual, June 2025
- Good Housekeeping and Pollution Prevention Manual, June 2025
- Post-Construction Stormwater Management Inspection & Maintenance Manual, June 2025
- Phase III Chesapeake Bay TMDL Action Plan, March 2025
- James River Tidal Bacteria TMDL Action Plan (2023– 2028), April 2025
- Nutrient Management Plans, March 2025
- VCCS Standards and Specifications, September 2024
- Outfall Information Table, June 2025
- SWM Facility Inventory, June 2025
- Public Education and Outreach Survey, June 2018
- MS4 General Permit Coverage Letter, October 2023

### **1.6 Annual Reporting (Part I.D)**

This Program Plan includes requirements to satisfy annual reporting of the General Permit:

- BCC shall submit an annual report to the department no later than October 1 of each year in a method, (i.e., how BCC must submit) and format (i.e., how the report shall be laid out) as specified by the department; the required content of the annual report is specified in Part I.E and Part II.B. The report shall cover the previous year from July 1 to June 30 (Part I.D.1). Following notification from the department of the start date for the required electronic submission of annual reports, as provided for in 9VAC25-31-1020, such forms and reports submitted after that date shall be electronically submitted to the department in compliance with this section and 9VAC25-31-1020. There shall be at least a three-month notice provided between the notification from the department and the date after which such forms and reports must be submitted electronically (Part I.D.2).
- The annual report shall include the following general information (Part I.D.3):
  - BCC, system name, and permit number (Part I.D.3.a);
  - The reporting period for which the annual report is being submitted (Part I.D.3.b);
  - A signed certification as per Part IV.K (Part I.D.3.c);
  - Each annual reporting item as specified in an MCM in Part I.E (Part I.D.3.d); and
  - An evaluation of the MS4 Program implementation, including a review of each MCM, to determine the MS4 Program's effectiveness and whether or not changes to the MS4 Program plan are necessary (Part I.D.3.e).
- When applicable, BCC shall include a status report on the implementation of the local TMDL action plans in accordance with Part II.B including any revisions to the plan (Part I.D.5).

For the purposes of this permit, the MS4 program plan and, annual report reports, the Chesapeake Bay TMDL action plan, and Chesapeake Bay TMDL implementation annual status reports shall be maintained as separate documents and submitted to the department as required by this permit as two separate documents (Part I.D.6).

## 2.0 SCHEDULE

Some of the BMPs require Program documents or actions to address permit requirements. Table 1 lists some of these documents and actions with dates critical for assuring compliance with the General Permit. Table 1 is intended to assist with Program Plan implementation.

<b>Table 1: Schedule for Program Implementation.</b>		
<b>Annual Schedule</b>		
<b>BMP / Regulation</b>	<b>Necessary Action</b>	<b>Timeline*</b>
6.5 / Part I.E.6.k	Review and Update SWPPP After an Unauthorized Discharge, Release or Spill Reported, if Applicable	<b>30 Days (Review), and 90 Days (Update)</b>
6.6 / Part I.E.6.s	Implement a Nutrient Management Plan After Final Stabilization of a Land Disturbance Project	<b>6 Months After Final Stabilization</b>
6.6 / Part I.E.6.u	Nutrient Management Plans Submitted to DCR	<b>30 Days Prior to Expiration</b>
SC3.1 / Part II.B.7	Notify DEQ in Writing of a Previously Unidentified Significant Source of PCBs within the MS4 Area	Not applicable 30 Days of Discovery
2.2 / Part I.E.2.d	Implement Four Public Involvement and Participation Activities	<b>June 30</b>
6.5 / Part I.E.6.k	Annually Review High-Priority Facilities without SWPPPs and Develop SWPPP if Required, Maintain a List of High-Priority Facilities	<b>June 30 (Review) and December 31 (Develop)</b>
3.1 / Part I.E.3.a.(5)	Update MS4 Map, Information Table, and Check for Any Approved TMDLs	<b>October 1</b>
3.4 / Part III.B, D, & E	Report BMPs Implemented and Inspected Using DEQ BMP Warehouse	<b>October 1</b>
1.6 & CB-SC.2 / Part I.D	Submit Annual Report and Chesapeake Bay TMDL Implementation Annual Status Report	<b>October 1</b>
2.1 / Part I.E.2.b.(3)	Post Annual Report and Chesapeake Bay TMDL Implementation Annual Status Report on the Stormwater Webpage	<b>November 1 (30 Days After October 1)</b>
<b>Permit Cycle Schedule</b>		
<b>BMP/Regulation</b>	<b>Necessary Action</b>	<b>Timeline*</b>
9VAC25-890-30	Submit Registration Statement, Draft Chesapeake Bay TMDL Action Plan	Completed (October 1, 2023)
2.1 / Part I.E.2.b	Update and Maintain a Stormwater Webpage	Completed February 1, 2024 (3 months)
6.6 / Part I.E.6.u	Nutrient Management Plans Expired on 11/1/2023 submitted to DCR	Not Applicable May 1, 2024 (6 months)
.4 / Part 1.C.3	Update the MS4 Program Plan	Completed May 1, 2024 (6 months)

Permit Cycle Schedule		
BMP / Regulation	Necessary Action	Timeline*
1.4 & 2.1 / Part 1.C.3	Post an Updated MS4 Program Plan on Stormwater Webpage	Completed June 1, 2024 (30 days after 6 months)
CB-SC.1 / Part II.A.12.b	Submit Phase III Chesapeake Bay TMDL Action Plan / Public Comment Period Prior to Submittal to DEQ	Completed November 1, 2024 / 15 days (12 months)
6.5 / Part I.E.6.g	Identify Any New High-Priority Facilities within Expanded 2020 CUA	Not Applicable November 1, 2024 (12 months)
6.6 / Part I.E.6.q	Identify Areas within Expanded 2020 CUA Requiring Nutrient Management Plans	Not Applicable November 1, 2024 (12 months)
SC1.1, SC1.2 & SC2.1 & SC2.2 / Part II.B.2.a	Update the James River Tidal Bacteria TMDL Action Plan as Applicable / Public Comment Period Prior to Submittal to DEQ	Completed May 1, 2025 / 15 days (18 months)
6.4 / Part I.E.6.d	Conduct GHPP/IDDE Training	Completed June 30, 2025 (Once per 24 months)
3.1 / Part I.E.3.a.(1)	Update MS4 Map	Completed November 1, 2025 (24 months)
3.1 / Part I.E.3.a.(3)	Submit GIS Geodatabase or Shapefiles of Outfalls and MS4 Area with Attribute Tables	<b>To be Completed November 1, 2025 (24 months)</b>
6.1 / Part I.E.6.b.(1)(a)	Update Anti-icing and Deicing GHPP Procedures	Completed November 1, 2025 (24 months)
3.2 / Part II.B.2.b	Develop and Initiate Implementation of TMDLs Approved by EPA on or after July 1, 2018, and Prior to October 31, 2023, in which a WLA has been Allocated / Public Comment Period Prior to Submittal to DEQ	Not Applicable May 1, 2026 / 15 days (30 months)
SC2.1 / Part II.B.6.d	Submit to DEQ an Update on the Progress Made Toward Achieving Local Sediment, Phosphorus and Nitrogen TMDL Action Plan Goals and Anticipated End Dates / Public Comment Period Prior to Submittal to DEQ	Not Applicable November 1, 2026 / 15 days (36 months)
SC3.1 / Part II.B.8.a	Develop an Anti-icing and Deicing Agent Education and Outreach Strategy for Chloride TMDLs / Public Comment Period Prior to Submittal to DEQ	Not Applicable November 1, 2026 / 15 days (36 months)
SC3.1 / Part II.B.8.c	Review GHPP Procedures for Anti-icing and Deicing Agent Application, Handling, Storage and Transport Activities / Public Comment Period Prior to Submittal to DEQ	Not Applicable November 1, 2026 / 15 days (36 months)

Permit Cycle Schedule		
BMP / Regulation	Necessary Action	Timeline*
6.6 / Part I.E.6.r	Develop and Implement Nutrient Management Plans on Areas within the Expanded 2020 CUA.	Not Applicable November 1, 2026 (36 months)
6.6 / Part I.E.6.u	No Nutrient Management Plans Expired	Completed November 1, 2026 (36 months)
6.1 / Part I.E.6.b.(2)	Update Renovation and Significant Exterior Maintenance GHPP Procedures	Completed November 1, 2026 (36 months)
6.5 / Part I.E.6.h	Develop and Implement New High Priority Facility SWPPP(s), if Applicable	Not Applicable November 1, 2026 (36 months)
3.3 / Part II.C.1	Develop and Maintain Written Inspection and Maintenance Procedures for Ecosystem Restoration Projects	Not Applicable November 1, 2026 (36 months)
6.4 / Part I.E.6.d	Conduct GHPP/IDDE Training	<b>To be Completed June 30, 2027 (Once per 24 months)</b>
3.3 / Part II.C.2	Inspect Ecosystem Restoration Projects Implemented as Part of a Current TMDL Action Plan	Not Applicable November 1, 2028 (once every 60 months)
CB-SC.1 / Part II.A.12.b.(5)	Implement BMPs to Meet Cumulative Reductions Calculated in the Phase III Chesapeake Bay TMDL Action Plan	Completed November 1, 2028 (60 months)
CB-SC.1 / Part II.A.15	Update the Phase III Chesapeake Bay TMDL Action Plan to Offset Increased Loads from New Sources Initiating Construction between July 1, 2009, and October 31, 2023, Located in the Expanded 2020 CUA	Not Applicable November 1, 2028 (60 months)
CB-SC.1 / Part II.A.16	Update the Phase III Chesapeake Bay TMDL Action Plan to Offset Increased Loads from Grandfathered Projects that Began Construction After July 1, 2014.	Not Applicable November 1, 2028 (60 months)

\*Not bolded text indicates schedule item is complete or not applicable. **Bolded** text indicates the schedule item is not complete or is completed continuously throughout the permit cycle.

### **3.0 PROGRAM PLAN BEST MANAGEMENT PRACTICES**

This Section includes the BMPs that BCC will implement to meet the requirements for each MCM and the applicable Special Conditions described in the General Permit.

#### **BMP 1.1 Public Education and Outreach Program (Part I.E.1)**

**Description:** BCC shall implement a public education and outreach program designed to (Part I.E.1.a):

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

BCC shall identify no fewer than three high-priority stormwater issues to meet the goal of educating the public in accordance with Part I.E.1.a. High-priority issues may include the following examples: Chesapeake Bay nutrients, pet wastes, local receiving water impairments, TMDLs, high-quality receiving waters, litter control, BMP maintenance, anti-icing and deicing agent application, planned green infrastructure redevelopment, planned ecosystem restoration projects, and illicit discharges from commercial sites (Part I.E.1.b). The high-priority public education and outreach program, as a whole, shall (Part I.E.1.c):

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

BCC shall use two or more of the strategies listed in Table 2 per year to communicate to the target audience the identified high-priority stormwater issues including how to reduce stormwater pollution (Part I.E.1.d).

BCC may coordinate its public education and outreach efforts with other MS4 permittees; however, each permittee shall be individually responsible for meeting all of its state permit requirements (Part I.E.1.e).

BCC may identify staff, students, members of the general public, and other users of facilities operated by BCC as the target audience for education and outreach strategies (Part I.E.1.f.(4)). Staff training required for Good Housekeeping and Pollution Prevention does not qualify as a strategy for public education and outreach (Part I.E.1.f.(6)).

<b>Table 2: Strategies for Public Education and Outreach</b>	
<b>Strategies</b>	<b>Examples (not meant to be all inclusive or limiting)</b>
Traditional written materials	Informational brochures, newsletters, fact sheets, utility bill inserts, or recreational guides for targeted groups of citizens
Alternative materials	Bumper stickers, refrigerator magnets, t-shirts, or drink koozies
Signage	Temporary or permanent signage in public places or facilities, vehicle signage, billboards, or storm drain stenciling
Media materials	Information disseminated through electronic media, radio, televisions, movie theater, newspaper, or GIS story maps
Speaking engagements	Presentations to school, church, industry, trade, special interest, or community groups
Curriculum materials	Materials developed for school-aged children, students at local colleges or universities, or extension classes offered to local citizens
Training materials	Materials developed to disseminate during workshops offered to local citizens, trade organization, or industrial officials
Public education activities	Booth at community fair, demonstration of stormwater control projects, presentation of stormwater materials to schools to meet applicable education Standards of Learning or curriculum requirements, or watershed walks
Public meetings	Public meetings on proposed community stormwater management retrofits, green infrastructure redevelopment, ecosystem restoration projects, TMDL development, [ climate change's effects on stormwater management, voluntary residential low impact development, or other stormwater issues

A summary of BCC's anticipated Public Education and Outreach Activities for the permit year is in Table 3. Activities will be tracked in the MS4 Tracking spreadsheet as they are completed.

<b>Table 3: Anticipated Public Education &amp; Outreach Activities</b>				
<b>#</b>	<b>High Priority Stormwater Issue</b>	<b>Strategy</b>	<b>Communication</b>	<b>Anticipated Time Period</b>
1	Public education on stormwater runoff	Traditional written materials	Brochure distributed via email	Spring or Summer Semester
2	TMDLs and Local Impaired Waters	Media materials	Slides on TV Monitors	Spring or Summer Semester
3	Good Housekeeping and Pollution Prevention	Signage	Storm drain markers	Spring or Summer Semester

Below is a list of high-priority stormwater issues BCC will communicate to the public as part of the public education and outreach program (Part I.E.1.f.(1)).

### **High Priority Stormwater Issue No. 1: Public education on stormwater runoff**

Rationale (Part I.E.1.f.(2)): This issue was selected based on the results of the public survey that indicate a strong need for increased knowledge on the steps to reduce stormwater pollution.

Target Audience (Part I.E.1.f.(3)): BCC's public audience is approximately 14,000 students, 600 faculty and staff. A portion of those students, faculty and staff visit campuses regularly.

Strategy to Communicate High Priority Stormwater Message (Part I.E.1.f.(7)): An email sent to the entire target audience that includes an informational brochure with the relevant message and a link to the BCC stormwater webpage. Email with an attached brochure was selected as the appropriate mechanism based on survey respondents identifying the methods as the most effective way to reach them with educational material.

Relevant Message (Part I.E.1.f.(7)): To address goals of the Program and concerns stemming from the survey results, the relevant message will include:

- Information regarding BCC's stormwater program
- Steps that can be taken to reduce stormwater pollution
- Knowledge of hazards associated with illegal discharges and improper disposal of waste, including pertinent legal implications
- Information for reporting a potential illicit discharge

Time Period (Part I.E.1.f.(8)): The information brochure will be distributed a minimum of once a year to the public audience within the permit year.

Measurable Goal (Part I.E.1.i.(7)): The dissemination of the informational brochure via email once a year to the public audience within the permit year.

### **High Priority Stormwater Issue No. 2: TMDLs and Local Impaired Waters**

Rationale (Part I.E.1.f.(2)): Survey results indicate a lack of understanding of the major contributors of the pollutants of concern in the Chesapeake Bay (nitrogen, phosphorous and sediment). In addition, TV monitors were selected as the second most effective method to reach BCC's public.

Target Audience (Part I.E.1.f.(3)): BCC's public audience is approximately 14,000 students and 600 faculty and staff.

Strategy to Communicate High Priority Stormwater Message (Part I.E.1.f.(7)): The message will be conveyed using a series of slides displayed on TV monitors placed in heavily trafficked areas on campus.

Relevant Message (Part I.E.1.f.(7)): To address goals of the Program and concerns stemming from the survey results, the relevant message will include:

- General information about stormwater runoff (where it drains, pollutants, etc.)
- Explanation of TMDL as a pollution diet and WLAs
- Chesapeake TMDL POCs, causes and effects, and how BCC addresses TMDLs
- Local TMDL POCs causes and effects, and how BCC addresses TMDLs

Time Period (Part I.E.1.f.(8)): The slides will be placed on the TV monitors within the Spring or Summer within the permit year.

Measurable Goal (Part I.E.1.i.(7)): The slides placed on the TV monitors within the permit year.

### **High Priority Stormwater Issue No. 3: Good Housekeeping and Pollution Prevention**

Rationale (Part I.E.1.f.(2)): Survey results indicate that 87% percent of the public audience does not know that storm inlets on the campus drain straight to local waterways. The fact that stormwater flows from properties into a storm drain and via the storm sewer system to an outfall into a waterway is fundamental knowledge needed to understand how local waterways can become impaired and require a TMDL.

Target Audience (Part I.E.1.f.(3)): BCC's public audience is approximately 14,000 students, 600 faculty and staff. A portion of those students, faculty and staff visit the campuses regularly. BCC's students, faculty and staff park their vehicles in parking lots where they are likely to see a storm drain marker.

Strategy to Communicate High Priority Stormwater Message (Part I.E.1.f.(7)): A simple message is conveyed on the storm drain markers to prevent intentional pollution and awareness of the fact that storm inlets drain directly to waterways.

Relevant Message (Part I.E.1.f.(7)): No dumping. Drains to a local waterway.

Time Period (Part I.E.1.f.(8)): The storm drain marker installation will be completed in the Spring or Summer within the permit year.

Measurable Goal (Part I.E.1.i.(7)): Storm drain markers will be installed and visible to BCC's public that visits one or more of the campuses within the permit year.

**Necessary documentation for implementation:** (1) Survey results; (2) Email of distributed brochure addressing steps to reduce stormwater pollution; (3) Email from the IT department that slides were placed on TV monitors and the slides conveying the message; and (4) Photos of storm drain markers and record of how many were installed.

**Responsible individual for implementation:** BCC Safety and Health Manager

**Implementation schedule:** Outreach will be conducted a minimum of once a year to the public audience for each water quality issue identified.

**Measurable goal:** Effectiveness of the BMP will be determined by the completion and necessary documentation of the selected strategies to convey the three water quality issues.

## **BMP 2.1 Webpage Dedicated to MS4 Program & Stormwater Pollution Prevention (Part I.E.2)**

**Description:** BCC shall develop and implement procedures for the following (Part I.E.2.a):

- The public to report potential illicit discharges, improper disposal, or spills to the MS4, complaints regarding land disturbing activities, or other potential stormwater pollution concerns (Part I.E.2.a.(1));
- The public to provide comments on BCC's MS4 Program plan (Part I.E.2.a.(2));
- Responding to public comments received on the MS4 Program plan or complaints (Part I.E.2.a.(3)); and
- Maintaining documentation of public comments received on the MS4 Program and associated MS4 Program plan and BCC's response (Part I.E.2.a.(4)).

### **Procedures for Public Comments or Complaints concerning the MS4 Program Plan**

When public comments or complaints are received concerning the MS4 Program plan via either email or telephone, the Director of Facilities and Safety or designee will respond to the comment or complaint from the public within a reasonable amount of time. The public input or complaint and the Director's response will be input into the MS4 Tracking spreadsheet.

No later than three months (February 1, 2024), BCC shall update and maintain the webpage dedicated to the MS4 Program and stormwater pollution prevention (Part I.E.2.b). The following will be maintained on the BCC's Stormwater webpage:

- The effective MS4 permit and coverage letter (Part I.E.2.b.(1));
- The most current MS4 Program plan or location where the MS4 Program plan can be obtained (Part I.E.2.b.(2));
- The annual report for each year of the term covered by this permit no later than 30 days after submittal to the department (Part I.E.2.b.(3));
- The most current Chesapeake Bay TMDL action plan or location where the Chesapeake Bay TMDL action plan can be obtained (Part I.E.2.b.(4));
- The Chesapeake Bay TMDL implementation annual status reports for each year of the term covered by this permit no later than 30 days after submittal to the department (Part I.E.2.b.(5));
- A mechanism for the public to report potential illicit discharges, improper disposal, or spills to the MS4, complaints regarding land disturbing activities, or other potential stormwater pollution concerns (Part I.E.2.b.(6));
- Methods for how the public can provide comments on BCC's MS4 Program plan in accordance with Part I.E.2.a.(2); and if applicable, the Chesapeake Bay TMDL action plan in accordance with Part II A 13 (Part I.E.2.b.(7)); and
- A copy of the most recent VCCS Standards and Specifications (Part I.E.5.d.(2)(a))
- A copy of the most recent VCCS Standards and Specifications approval letter from DEQ (Part I.E.5.d.(2)(b))

**Webpage address:** <https://www.brightpoint.edu/index.php?/about/sustainability/>

**Necessary documentation for implementation:** (1) MS4 Tracking spreadsheet; (2) Effective MS4 Permit and coverage letter; (3) Most Recent MS4 Program Plan; (4) All MS4 Annual Reports within permit cycle; (5) Most Recent VCCS Standards and Specifications; and (6) Most recent VCCS Standards and Specifications DEQ approval letter.

**Responsible individual for implementation:** BCC Safety and Health Manager

**Implementation schedule:** BCC shall continue to provide mechanisms on the webpage for public input and reporting illicit discharges or complaints. The current Program Plan will be posted on the webpage. Annual reports will be posted on the webpage within 30 days of submittal (November 1) to DEQ of each year.

**Measurable goal:** Effectiveness will be determined by the webpage including: (1) effective MS4 permit and coverage letter; (2) latest MS4 Program Plan; (3) all annual reports developed within the permit cycle no later than 30 days after submittal to the department; (4) a mechanism for the public to report potential illicit discharges, improper disposal, or spills, complaints regarding land disturbing activities, or other potential pollution concerns; (5) methods for public input on the BCC's MS4 Program Plan and other documents that require a public comment period; (6) responding to public input; (7) maintaining public input received and BCC responses; and (8) Latest VCCS Standards and Specifications.

## BMP 2.2 Public Involvement and Participation (Part I.E.2)

**Description:** BCC will implement, promote, participate in, or coordinate on no fewer than four activities per year for two or more of the categories listed in Table 4 to provide an opportunity for public involvement to improve water quality and support local restoration and clean-up projects (Part I.E.2.d).

- BCC may coordinate the public involvement opportunities listed in Table 4 with other MS4 permittees; however, each permittee shall be individually responsible for meeting all of the permit requirements (Part I.E.2.e).
- BCC may also include staff and students in public participation events; however, the activity cannot solely include or be limited to staff participants with stormwater, groundskeeping, and maintenance duties in order for an event to qualify as a public participation event (Part I.E.2.f).
- Staff training required in accordance with Part I.E.6.d does not qualify as a public participation event unless the training activity solicits participation from target audiences beyond staff or contractors with stormwater, groundskeeping, and maintenance duties (Part I.E.2.g).

<b>Table 4: Public Involvement Opportunities</b>	
<b>Public Involvement Opportunity Categories</b>	<b>Examples</b> (provided as example & are not meant to be all inclusive or limiting)
Monitoring	Establish or support citizen monitoring group
Restoration	Stream, watershed, shoreline, beach, or park clean-up day, adopt-a-waterway program, tree plantings, and riparian buffer plantings.
Public education activities	Booth at community fair, demonstration of stormwater control projects, climate change's effects on stormwater management, presentation of stormwater materials to schools to meet applicable education Standards of Learning or curriculum requirements, or watershed walks.
Public meetings	Public meetings on proposed community stormwater management retrofits, green infrastructure redevelopment, ecosystem restoration projects, TMDL development, voluntary residential low impact development, climate change's effects on stormwater management, or other stormwater issues
Disposal or collection events	Household hazardous chemicals collection, vehicle fluids collection
Pollution prevention	Adopt-a-storm drain program, implement a storm drain marking program, promote use of residential stormwater BMPs, implement pet waste stations in public areas, adopt-a-street program.

Table 5 provides the anticipated activities for the permit reporting year including (Part I.E.2.h.(3)):

- A description of the public involvement activities to be implemented by BCC,
- The anticipated time period the activities will occur, and
- A metric for each activity to determine if the activity is beneficial to water quality. An example of metrics may include the weight of trash collected from a stream cleanup, the number of participants in a hazardous waste collection event.

Activities will be tracked in the MS4 Tracking spreadsheet as they are completed.

Table 5: Anticipated Public Involvement Activities			
Category	Activity Description	Anticipated Time Period for the Activity to Occur	Metric to Determine Benefit to Water Quality
Restoration	Clean up Event	Fall Semester	Number of people reached
Restoration	Clean up Event	Spring Semester	Number of people reached
Restoration	Clean up Event	Spring Semester	Number of people reached
Educational	Classroom Curriculum	Spring Semester	Number of people reached

**Necessary documentation for implementation:** (1) A description of public involvement activities to be implemented; (2) Anticipated time period the activities will occur; and (3) Metric for each activity to determine if the activity is beneficial to water quality.

**Responsible individual for implementation:** BCC Safety and Health Manager

**Implementation schedule:** Public participation will be conducted a minimum of four times a year at the anticipated times indicated in Table 5.

**Measurable goal:** Effectiveness will be determined by the selected metric for each activity.

### **BMP 3.1 Storm Sewer Map and Outfall Information Table (Part I.E.3)**

**Description:** BCC shall develop and maintain an accurate MS4 map and information table as follows (Part I.E.3.a):

- An updated map of the MS4 owned or operated by BCC within MS4 regulated service area no later than 24 months (November 1, 2025) after the permit effective date that includes, at a minimum (Part I.E.3.a.(1)):
  - MS4 outfalls discharging to surface waters, except as follows (Part I.E.3.a.(1)(a)):
    - In cases where the outfall is located outside of the BCC's legal responsibility, BCC may elect to map the known point of discharge location closest to the actual outfall; and
    - In cases where the MS4 outfall discharges to receiving water channelized underground, BCC may elect to map the point downstream at which the receiving water emerges above ground as an outfall discharge location. If there are multiple outfalls discharging to an underground channelized receiving water, the map shall identify that an outfall discharge location represents more than one outfall. This is an option BCC may choose to use and recognizes the difficulties in accessing outfalls to underground channelized stream conveyances for purposes of mapping, screening, or monitoring.
  - A unique identifier for each mapped item required in Part I.E.3 (Part I.E.3.a.(1)(b));
  - The name and location of receiving waters to which the MS4 outfall or point of discharge discharges (Part I.E.3.a.(1)(c));
  - MS4 regulated service area (Part I.E.3.a.(1)(d)); and
  - Stormwater management facilities owned or operated by BCC (Part I.E.3.a.(1)(e)).
- BCC shall maintain an outfall information table associated with the MS4 map that includes the following information for each outfall or point of discharge for those cases in which BCC elects to map the known point of discharge in accordance with Part I.E.3.a.(1)(a). The outfall information table may be maintained as a shapefile attribute table. The outfall information table shall contain the following (Part I.E.3.a.(2)):
  - A unique identifier as specified on the MS4 map (Part I.E.3.a.(2)(a));
  - The latitude and longitude of the outfall or point of discharge (Part I.E.3.a.(2)(b));
  - The estimated regulated acreage draining to the outfall or point of discharge (Part I.E.3.a.(2)(c));
  - The name of the receiving water (Part I.E.3.a.(2)(d));
  - The 6th Order Hydrologic Unit Code of the receiving water (Part I.E.3.a.(2)(e));
  - An indication as to whether the receiving water is listed as impaired in the Virginia 2022 305(b)/303(d) Water Quality Assessment Integrated Report (Part I.E.3.a.(2)(f)); and
  - The name of any EPA approved TMDLs for which BCC is assigned a wasteload allocation (Part I.E.3.a.(2)(g)).
- No later than 24 months (November 1, 2025) after permit issuance, BCC shall submit to DEQ a format file geodatabase or two shapefiles that contain at a minimum (Part I.E.3.a.(3)):
  - A point feature class or shapefile for outfalls with an attribute table containing outfall data elements required in accordance with Part I.E.3.a.(2) (Part I.E.3.a.(3)(a)); and
  - A polygon feature class or shapefile for the MS4 service area as required in accordance with Part I.E.3.a.(1)(d) with an attribute table containing the following information (Part I.E.3.a.(3)(b)):
    - MS4 operator name;
    - MS4 permit number (VAR04); and
    - MS4 service area total acreage rounded to the nearest hundredth.

- All file geodatabase feature classes or shapefiles shall be submitted in the following data format standards (Part I.E.3.a.(4)):
  - Point data in NAD83 or WGS84 decimal degrees global positional system coordinates (Part I.E.3.a.(4)(a));
  - Data projected in Virginia Lambert Conformal Conic format (Part I.E.3.a.(4)(b));
  - Outfall location accuracy shall be represented in decimal degrees rounded to at least the fifth decimal place for latitude and longitude to ensure point location accuracy (e.g., 37.61741, -78.15279) (Part I.E.3.a.(4)(c)); and
  - Metadata that shall provide a description of each feature class or shapefile dataset, units of measure as applicable, coordinate system, and projection (Part I.E.3.a.(4)(d)).
- No later than October 1 of each year, BCC shall update the MS4 map and outfall information table to include any new outfalls constructed or approved or both during the immediate preceding reporting period (Part I.E.3.a.(5)).
- BCC shall provide written notification to any downstream adjacent MS4 of any known physical interconnection established or discovered after the effective date of this permit (Part I.E.3.a.(6)).

**Table 6: List of Interconnected MS4 Regulated Area(s)**

Chesterfield County
Virginia Department of Transportation

**Necessary documentation for implementation:** (1) Storm sewer system map; (2) Outfall Information Table; and (3) GIS compatible geodatabase or shapefiles of MS4 map; and (4) If applicable, written notification of physical interconnections to the downstream MS4.

**Responsible individual for implementation:** BCC Director of Facilities and Safety

**Implementation schedule:** The MS4 map and information table will be updated annually at the end of each reporting year. Any new MS4 interconnections will be notified upon discovery.

**Measurable goals:** Effectiveness will be determined by maintaining an up-to-date map of the storm sewer map and outfall information table and by submitting the GIS-compatible geodatabase or shapefiles of the storm sewer map; and notifying any discovered interconnected MS4s.

### **BMP 3.2 Prohibit Non-Stormwater Discharges (Part 1.E.3.b)**

**Description:** BCC shall prohibit, through ordinance, policy, standard operating procedures, or other legal mechanism, to the extent allowable under federal, state, or local law, regulations, or ordinances, unauthorized non-stormwater discharges into the MS4. Non-stormwater discharges or flows identified in 9VAC25-890-20 D 3 shall only be addressed if they are identified by BCC as a significant contributor of pollutants discharging to the MS4. Flows that have been identified by the department as de minimis discharges are not significant sources of pollutants to surface water (Part 1.E.3.b).

BCC will prohibit non-stormwater discharges into the storm sewer system through language provided within the Standards of Conduct for Employees and the Student Handbook for Students, each of which provide methods and procedures for reporting and corrective and disciplinary action.

For effective prohibition of non-stormwater discharges from contractors operating on campus, refer to BMP 6.2.

**Necessary documentation for implementation:** (1) Standards of Conduct for Employees; and (2) Student Handbook.

**Responsible individual for implementation:** BCC Director of Facilities and Safety

**Implementation schedule:** Implementation of the Standards of Conduct for Employees and the Student Handbook for students will continue.

**Measurable goal:** Effectiveness will be determined based upon all students, faculty and staff having access to the Standards of Conduct for Employees and the Student Handbook for Students.

### **BMP 3.3 Implement Illicit Discharge Detection and Elimination Procedures (Part I.E.3.c)**

**Description:** BCC shall maintain, implement, and enforce illicit discharge detection and elimination (IDDE) written procedures designed to detect, identify, and address unauthorized non-stormwater discharges, including illegal dumping, to the MS4 to effectively eliminate the unauthorized discharge. Written procedures shall include (Part I.E.3.c):

- A description of the legal authorities, policies, standard operating procedures, or other legal mechanisms available to BCC to eliminate identified sources of ongoing illicit discharges including procedures for using legal enforcement authorities (Part I.E.3.c.(1)).
- Dry weather field screening protocols to detect, identify, and eliminate illicit discharges to the MS4. The protocol shall include (Part I.E.3.c.(2)):
  - A prioritized schedule of field screening activities and rationale for prioritization determined by BCC based on such criteria as age of the infrastructure, land use, historical illegal discharges, dumping or cross connections (Part I.E.3.c.(2)(a));
  - If the total number of MS4 outfalls is equal to or less than 50, a schedule to screen all outfalls annually (Part I.E.3.c.(2)(b));
  - If the total number of MS4 outfalls is greater than 50, a schedule to screen a minimum of 50 outfalls annually such that no more than 50% are screened in the previous 12-month period. The 50% criteria is not applicable if all outfalls have been screened in the previous three years (Part I.E.3.c.(2)(c));
  - BCC may adopt a risk-based approach to dry weather screening identifying observation points based upon illicit discharge risks upstream of an outfall. Observation points may include points of interconnection, manholes, points of discharge, conveyances, or inlets suspected to have a high likelihood of receiving illicit discharges (Part I.E.3.c.(2)(d));
  - Each observation point screened may be counted as one outfall screening activity equivalent and counted towards the requirements of Part I.E.3.c.(2)(b) or Part I.E.3.c.(2)(c); however, at least 50% of the minimum annual screening events must include outfall screening (Part I.E.3.c.(2)(e));
  - Illicit discharges reported by the public and subsequent investigations may not be counted as screening events; however, once the resolution of the investigation and the date the investigation was closed has been documented, an observation point may be established for future screening events (Part I.E.3.c.(2)(f)); and
  - A checklist or mechanism to track the following information for dry weather screening events (Part I.E.3.c.(2)(g)):
    - The unique identifier for the outfall or observation point;
    - Time since the last precipitation event;
    - The estimated quantity of the last precipitation event;
    - Site descriptions (e.g., conveyance type and dominant watershed land uses);
    - Observed indicators of possible illicit discharge events, such as floatables, deposits, stains, and vegetative conditions (e.g., dying or dead vegetation, excessive vegetative growth);
    - Whether or not a discharge was observed;
    - If a discharge was observed, the estimated discharge and visual characteristics of the discharge (e.g., odor, color, clarity) and the physical condition of the outfall; and
    - For observation points, the location, downstream outfall unique identifier, and risk factors or rationale for establishing the observation point.

- A timeframe upon which to conduct an investigation to identify and locate the source of any observed unauthorized non-stormwater discharge. Priority of investigations shall be given to discharges of sanitary sewage and those believed to be a risk to human health and public safety. Discharges authorized under a separate VPDES or state permit require no further action under this permit (Part I.E.3.c.(3)).
- Methodologies to determine the source of all illicit discharges. If BCC is unable to identify the source of an illicit discharge within six months of beginning the investigation then BCC shall document that the source remains unidentified. If the observed discharge is intermittent, BCC shall document that attempts to observe the discharge flowing were unsuccessful (Part I.E.3.c.(4)).
- Methodologies for conducting a follow-up investigation for illicit discharges that are continuous or that BCC expects to occur more frequently than a one-time discharge to verify that the discharge has been eliminated except as provided for in Part I.E.3.c.(4). (Part I.E.3.c.(5));
- A mechanism to track all illicit discharge investigations to document the following (Part I.E.3.c.(6)):
  - The dates that the illicit discharge was initially observed, reported, or both (Part I.E.3.c.(6)(a));
  - The results of the investigation, including the source, if identified (Part I.E.3.c.(6)(b));
  - Any follow-up to the investigation (Part I.E.3.c.(6)(c));
  - Resolution of the investigation (Part I.E.3.c.(6)(d)); and
  - The date that the investigation was closed (Part I.E.3.c.(6)(e)).

The IDDE procedures described in Part I.E.3.c, the MS4 map and outfall information table are incorporated into the MS4 Program plan by reference. The map shall be made available to the department within 14 days upon request.

The outfall information table is maintained in the MS4 Tracking spreadsheet. The MS4 Tracking spreadsheet is used to document the annual outfall screening results and any IDDEs.

**Necessary documentation for implementation:** (1) Illicit Discharge Detection and Elimination (IDDE) Manual; (2) Outfall information table; (3) MS4 map; and (4) Outfall screening field forms.

**Responsible individual for implementation:** BCC Director of Facilities and Safety

**Implementation schedule:** Annual outfall screening, as described in BCC's IDDE Program Manual that includes the schedules, mechanisms, and procedures described in this BMP and the General Permit.

**Measurable goals:** Effectiveness will be determined by maintaining, implementing, and enforcing illicit discharge detection and elimination (IDDE) written procedures.

#### **BMP 4.1 ESC Compliance for Land Disturbing Activities (Part I.E.4)**

**Description:** BCC shall utilize its legal authority, such as ordinances, permits, orders, specific contract language, and interjurisdictional agreements, to address discharges entering the MS4 from regulated construction site stormwater runoff. BCC shall control construction site stormwater runoff as follows (Part I.E.4.a):

- BCC is a nontraditional permittee under the purview of the VCCS. The VCCS has developed standards and specifications in accordance with the Virginia Erosion and Sediment Control Law (§ 62.1-44.15:51 et seq. of the Code of Virginia) and Virginia Erosion and Sediment Control Regulations (9VAC25-840), BCC shall implement the most recent department approved standards and specifications (Part I.E.4.a.(3)).
  - The most recently approved standards and specifications or if incorporated by reference, the location where the standards and specifications can be viewed (Part I.E.4.d.(3)(a)); and
  - A copy of the most recent standards and specifications approval letter from the department (Part I.E.4.d.(3)(b)).

BCC shall require implementation of appropriate controls to prevent non-stormwater discharges to the MS4, such as wastewater, concrete washout, fuels and oils, and other illicit discharges identified during land disturbing activity inspections. The discharge of non-stormwater discharges other than those identified in 9VAC25-890-20 D through the MS4 is not authorized by this state permit (Part I.E.4.b).

Employees and contractors serving as plan reviewers, inspectors, program administrators, and construction site operators shall obtain the appropriate certifications as required under the Virginia Erosion and Sediment Control Law and its attendant regulations (Part I.E.4.c).

Regulated land disturbing activity on the BCC campuses is managed by the latest edition of the DEQ approved Virginia Community College System's "Standards and Specifications for Erosion and Sediment Control and Stormwater Management."

The VCCS Standards and Specifications provide for the following:

- A description of the legal authorities utilized to ensure compliance with Part I.E.4. for erosion and sediment control and construction site stormwater runoff control such as ordinances, permits, orders, specific contract language, policies, and interjurisdictional agreements (Part I.E.4.d.(4));
- Erosion and Sediment Control (ESC) plan approval by the VCCS through recommendation of a VCCS contracted consultant. An approved plan is required prior to commencement of a regulated land disturbing activity and shall be compliant with the minimum standards listed in 9VAC25-840-40 of the Erosion and Sediment Control Regulations and the approved Standards and Specifications (Part I.E.4.d.(6));
  - Documentation for plan review and inspection procedures, by reference to laws, regulations, and the Virginia Erosion and Sediment Control Handbook (VESCH).
  - A description of circumstances that allow the VCCS Standards and Specifications Project Manager to make changes to an approved plan when found inadequate to address ESC.
- ESC inspection of land disturbing activities for compliance to the ESC Plan during or immediately following initial installation of ESC measures, at least once every two weeks, within 48 hours of a runoff-producing event; and at project completion. Inspections shall be conducted by an individual with a current ESC Inspector's Certification from DEQ (Part I.E.4.d.(6));

- Written inspection procedures that include the following (Part I.E.4.d.(6)):
  - An inspection checklist for documenting onsite erosion and sediment control structures and systems are properly maintained and repaired as needed to ensure continued performance of their intended function (Part I.E.4.d.(6)(a)); and
  - A list of all associated documents utilized for inspections, including checklists, department approved erosion and sediment control plans, or the most recently department approved Standards and Specifications, and any other documents utilized (Part I.E.4.d.(6)(b));
- Written procedures for requiring compliance with department approved erosion and sediment control plans and Standards and Specifications through corrective action or enforcement action to the extent allowable under federal, state, or local law, regulation, ordinance, or other legal mechanisms (Part I.E.4.d.(8)); and
- The roles and responsibilities of each of BCC's departments, divisions, or subdivisions in implementing the erosion and sediment control and construction site stormwater runoff control requirements in Part I.E.4. (Part I.E.4.d.(9)).

Where applicable, the VCCS Standards and Specifications requires implementation of appropriate controls to prevent non-stormwater discharges to BCC, such as wastewater, concrete washout, fuels and oils and other illicit discharges identified during land disturbing activity inspections at BCC (Part I.E.4.b).

A copy of the latest VCCS Standards and Specifications can be found on the BCC dedicated stormwater website (See BMP 2.1).

The MS4 Tracking spreadsheet documents construction project inspections.

**Necessary documentation for implementation:** (1) VCCS AS&S for Erosion and Sediment Control; (2) VCCS AS&S approval letter in Appendix B; (3) ESC Plan(s) approved by the VCCS; (4) Documentation of ESC Inspector Certification; (5) Completed ESC Inspection Forms for each regulated project; and (6) Notice to Comply and/or Stop Work Orders documentation and documentation of follow-up actions.

**Roles and responsible individual for implementation:** VCCS Program Managers are responsible for the ESC & SWM Program Administration, ESC & SWM signatory authority, and ESC & SWM plan review approval; Assigned VCCS Program Manager and BCC Project Manager are responsible for ESC plan review and inspection coordination; and the BCC Director of Facilities and Safety is responsible for coordination with the VCCS.

**Implementation schedule:** The implementation of this BMP will be ongoing with all regulated land disturbing activities on campus.

**Measurable goals:** Effectiveness will be determined by the implementation of the most current VCCS Standards and Specifications.

### **BMP 5.1 Compliance to Post-Construction Stormwater Management Regulation (Part 1.E.5)**

**Description:** BCC shall address post-construction stormwater runoff that enters the MS4 from the following land disturbing activities by implementing a post-construction stormwater runoff management program as follows (Part I.E.5.a):

- BCC shall implement the most recent department approved standards and specifications and maintain an inspection and maintenance program in accordance with Part I.E.5.b (Part I.E.5.a.(4)).

BCC shall implement an inspection and maintenance program for those stormwater management facilities owned or operated by BCC as follows (Part I.E.5.b):

- Within six months (May 1, 2024) of the permit effective date, BCC shall develop and maintain written inspection and maintenance procedures in order to ensure adequate long-term operation and maintenance of its stormwater management facilities. BCC may use inspection and maintenance specifications available from the Virginia Stormwater BMP Clearinghouse or inspection and maintenance plans developed in accordance with the department's Stormwater Local Assistance Fund (SLAF) guidelines (Part I.E.5.b.(1));
- Employees and contractors implementing the stormwater program shall obtain the appropriate certifications as required under the Virginia Stormwater Management Act and its attendant regulations (Part I.E.5.b.(2));
- BCC shall inspect stormwater management facilities owned or operated by BCC no less frequently than once per year. BCC may choose to implement an alternative schedule to inspect these stormwater management facilities based on facility type and expected maintenance needs provided that the alternative schedule and rationale is included in the MS4 Program plan. The alternative inspection frequency shall be no less often than once per five years (Part I.E.5.b.(3)); and
- If during the inspection of the stormwater management facility conducted in accordance with Part I.E.5.b.(2), it is determined that maintenance is required, BCC shall conduct the maintenance in accordance with the written procedures developed under Part I.E.5.b.(1) (Part I.E.5.b.(4)).

BCC shall include in the MS4 Program Plan the following (Part I.E.5.d.(2)):

- The most recently approved standards and specifications or if incorporated by reference, the location where the standards and specifications can be viewed (Part I.E.5.d.(2)(a)); and
- A copy of the most recent standards and specifications approval letter from DEQ (Part I.E.5.d.(2)(b)).
- A description of the legal authorities utilized to ensure compliance with Part I.E.5.a for post-construction stormwater runoff control such as ordinances (provide citation as appropriate), permits, orders, specific contract language, and interjurisdictional agreements (Part I.E.5.d.(3));
- Written inspection and maintenance procedures and other associated template documents utilized during inspection and maintenance of stormwater management facilities owned or operated by BCC (Part I.E.5.d.(4)); and
- The roles and responsibilities of each of BCC's departments, divisions, or subdivisions in implementing the post-construction stormwater runoff control program (Part I.E.5.d.(5)).

BCC will ensure post-construction stormwater management (SWM) for all regulated land disturbing activities through the VCCS plan approval in accordance with the VCCS Standards and Specifications for Erosion and Sediment Control and Stormwater Management (VCCS S&S). Approval from the VCCS will ensure the SWM plan has been prepared per the VSMP Regulations that, in part, require that stormwater runoff controls:

- are designed and installed in accordance with the appropriate water quality and water quantity design criteria as required in Part II (9VAC25-870-40 et seq.) of 9VAC25-870; and
- have an inspection and maintenance plan.

Implementation of this BMP will be accomplished through the verification of a VCCS approved stormwater management plan by a VCCS designated ESC and SWM plan review signature authority prior to providing written approval that allows the start of the land disturbance.

BCC will extract and retain a copy of SWM facility inspection and maintenance plans from the approved stormwater management plan for proposed stormwater management facilities to be used with the implementation of BMP 5.1.

BCC will perform long-term operations and maintenance of all stormwater facilities on campus utilizing the inspection and maintenance plans obtained from implementation of BMP 5.1. Where inspection and maintenance plans are not available from approved SWM plans, BCC will utilize BMP-specific inspection and maintenance instruction from the Virginia Stormwater Management Handbook or the BCC Post-Construction Stormwater Manual. Inspections will be performed either:

- As dictated on the schedule provided on the inspection and maintenance plans; or
- A minimum of once annually, whichever are the more frequent criteria.

Inspections will be performed using the best management practice (BMP) inspection and maintenance checklist, corresponding with the type of BMP, as provided in either the BCC Post-Construction Stormwater Manual or the latest edition of the Virginia Stormwater Management Handbook. The checklists provide lists of potential issues and methods to address the issue. Necessary maintenance identified during inspections will be conducted in a timely manner or depending on the complexity of the maintenance which may result in an alternative schedule indicated on the SWM Facility Inventory.

**Necessary documentation for implementation:** (1) Most recent VCCS S&S; (2) VCCS S&S Approval Letter; (3) Post-Construction Stormwater Management Inspection & Maintenance Manual; (4) VCCS approved SWM Plans and Calculations; (5) SWM Facility Inspection and Maintenance Plans; (6) Inspection Forms and (7) SWM Facility Inventory..

**Responsible individual for implementation:** VCCS Program Manager is responsible for the verification of an approved plan prior to approval to start land disturbance. The BCC Director of Facilities and Safety is responsible for tracking required information for reporting and obtaining inspection and maintenance plans for stormwater facilities.

**Implementation schedule:** The implementation of this BMP will be ongoing with all regulated land disturbing activities.

**Measurable goal:** Effectiveness will be measured by the implementation of the inspection and maintenance program on post-construction stormwater management facilities.

## **BMP 6.1 Pollution Prevention Procedures for Operations & Maintenance Activities (Part 1.E.6)**

**Description:** BCC shall maintain and implement written good housekeeping procedures for those activities listed in Part I.E.6.b at facilities owned or operated by BCC designed to meet the following objectives (Part I.E.6.a):

- Prevent illicit discharges (Part I.E.6.a.(1));
- Ensure BCC staff or contractors properly dispose of waste materials, including landscape wastes and prevent waste materials from entering the MS4 (Part I.E.6.a.(2));
- Prevent the discharge of wastewater or wash water not authorized in accordance with 9VAC25-890-20 D.3.u, into the MS4 without authorization under a separate VPDES permit (Part I.E.6.a.(3)); and
- Minimize the pollutants in stormwater runoff (Part I.E.6.a.(4)).

BCC shall develop and implement written good housekeeping procedures that meet the objectives established in Part I.E.6.a for the following activities (Part I.E.6.b):

- Road, street, sidewalk, and parking lot maintenance and cleaning (Part I.E.6.b.(1)):
  - Within 24 months (November 1, 2025) of permit issuance, BCC shall update and implement procedures in accordance with Part I.E to include implementation of best management practices for anti-icing and deicing agent application, transport, and storage (Part I.E.6.b.(1)(a));
  - Procedures developed in accordance with Part I.E shall prohibit the application of any anti-icing or deicing agent containing urea or other forms of nitrogen or phosphorus (Part I.E.6.b.(1)(b));
- Renovation and significant exterior maintenance activities (e.g., painting, roof resealing, and HVAC coil cleaning) not covered under a separate VSMP construction general permit. BCC shall develop and implement procedures no later than 36 months (November 1, 2026) after permit issuance (Part I.E.6.b.(2));
- Discharging water pumped from construction and maintenance activities not covered by another permit covering such activities (Part I.E.6.b.(3));
- Temporary storage of landscaping materials (Part I.E.6.b.(4));
- Maintenance of BCC owned or operated vehicles and equipment (i.e., prevent pollutant discharges from leaking BCC owned vehicles and equipment) (Part I.E.6.b.(5));
- Application of materials, including pesticides and herbicides shall not exceed manufacturer's recommendations (Part I.E.6.b.(6)); and
- Application of fertilizer shall not exceed maximum application rates established by applicable nutrient management plans. For areas not covered under nutrient management plans where fertilizer is applied, application rates shall not exceed manufacturer's recommendations (Part I.E.6.b.(7)).

A list of written good housekeeping procedures for the operations and maintenance activities as required by Part I.E.6.a and b are included in the Good Housekeeping and Pollution Prevention Program Manual incorporated by reference (Part I.E.6.x.(1)).

**Necessary documentation for implementation:** (1) Good Housekeeping/Pollution Prevention Program Manual; (2) Campus-specific SWPPPs; (3) Training documentation; (4) Completed Comprehensive Campus Evaluation form. All documentation is incorporated into the Good Housekeeping/Pollution Prevention Program Manual; and (5) Nutrient Management Plans.

**Responsible individual for implementation:** BCC Director of Facilities and Safety

**Implementation schedule:** Training will be provided once every 24 months, and comprehensive campus evaluations will be performed annually. No later than June 30 of each year, BCC will annually review any high-priority facility owned or operated by BCC for which a SWPPP has not been developed to determine if the facility has a high potential to discharge potential pollutants. If the facility is determined to be a high priority facility with a high potential to discharge pollutants, BCC will develop a SWPPP no later than December 31 of that same year.

**Measurable goals:** Effectiveness will be measured by the implementation of a campus-specific Stormwater Pollution Prevention Plan (SWPPP) as described in BMP 6.5, evaluated with a comprehensive campus evaluation as described for the measure of effectiveness for BMP 6.1, and the Pollution Prevention training described in BMP 6.4.

## **BMP 6.2 Contractor Safeguards, Measures and Procedures (Part I.E.6.c)**

**Description:** BCC shall require through the use of contract language, training, written procedures, or other measures within BCC's legal authority that contractors employed by BCC and engaging in activities described in Part I.E.6.b follow established good housekeeping procedures and use appropriate control measures to minimize the discharge of pollutants to the MS4. A summary of mechanisms BCC uses to ensure contractors working on behalf of BCCs implement the necessary good housekeeping and pollution prevention procedures, and stormwater pollution plans as appropriate (Part I.E.6.x.(4)):

All contractors performing work on BCC's properties shall be subject to the current Virginia regulation 9VAC25-890-40 The General VPDES Permit for Discharges of Stormwater from Small Municipal Separate Storm Sewer Systems (MS4); and the latest versions of BCC's MS4 Program Plan, Good Housekeeping and Pollution Prevention Manual, Nutrient Management Plan, and the latest approved Virginia Community College System's Standards and Specifications provided on the webpage below. Contractors implementing the stormwater program shall obtain the appropriate certifications as required under the Virginia Stormwater Management Act (VSMA) and its attendant regulations.

A Contractor Good Housekeeping and Pollution Prevention log is utilized to make Contractors aware of the documented procedures that they will adhere to in order to perform work on Campus.

<https://law.lis.virginia.gov/admincode/title9/agency25/chapter890/section40/>

<https://www.brightpoint.edu/index.php?/about/sustainability/>

This BMP is not intended for regulated land disturbing activity addressed with BMPs 4.1, 5.1, and 6.1.

**Necessary documentation for implementation:** (1) MS4 Program Plan; (2) Good Housekeeping and Pollution Prevention Manual; (3) Nutrient Management Plan; (4) VCCS Standards and Specifications; and (5) Contractor Good Housekeeping and Pollution Prevention Log.

**Responsible individual for implementation:** BCC Director of Facilities and Safety

**Implementation schedule:** BCC will ensure campus contractors engaging in activities with the potential to discharge pollutants are made aware of and have access to written procedures to minimize the discharge of pollutants to the MS4.

**Measurable goals:** Effectiveness will be measured by all contractors were made aware of and have access to the MS4 Program Plan, Good Housekeeping and Pollution Prevention manual, and the Virginia Community College System's Standards and Specifications via BCCs stormwater webpage.

### **BMP 6.3 Contractor Certification for Pesticide Application (Part I.E.6.d.(6))**

**Description:** Employees and contractors hired by BCC who apply pesticides and herbicides are trained or certified in accordance with the Virginia Pesticide Control Act (§ 3.2-3900 et seq. of the Code of Virginia). Certification by the Virginia Department of Agriculture and Consumer Services (VDACS) Pesticide and Herbicide Applicator program shall constitute compliance with this requirement. Contracts for the application of pesticide and herbicides executed after the effective date of this permit shall require contractor certification (Part I.E.6.d.(6)).

**Necessary documentation for implementation:** (1) Contract requiring certification; and/or (2) Campus staff certification.

**Responsible individual for implementation:** BCC Director of Facilities and Safety

**Implementation schedule:** BCC will continue to ensure contractor and/or staff certifications for the application of pesticides and herbicides.

**Measurable goal:** Effectiveness will be measured by all signed contracts executed for pesticide and herbicide application and/or campus staff will maintain their certifications.

#### **BMP 6.4 Employee Good Housekeeping/Pollution Prevention Training Plan (Part 1.E.6.d)**

**Description:** The written procedures established in accordance with Part I.E.6.a and b shall be utilized as part of the employee training program, and BCC shall develop a written training plan for applicable field personnel that ensures the following (Part I.E.6.d):

- Applicable field personnel shall receive training in the prevention, recognition, and elimination of illicit discharges no less often than once per 24 months (Part I.E.6.d.(1));
- Employees performing road, street, sidewalk, and parking lot maintenance shall receive training in good housekeeping procedures required under Part I.E.6.b.(1) no less often than once per 24 months (Part I.E.6.d.(2));
- Employees working in and around facility maintenance, public works, or recreational facilities shall receive training in applicable Part I E 6 a and b good housekeeping procedures required no less often than once per 24 months (Part I.E.6.d.(3));
- Employees working in and around high-priority facilities with a stormwater pollution prevention plan (SWPPP) shall receive training in applicable site specific SWPPP procedures no less often than once per 24 months (Part I.E.6.d.(4));
- Employees whose duties include emergency spill control and response shall be trained in spill control and response. Emergency responders, such as firefighters and law-enforcement officers, trained on the handling of spill control and response as part of a larger emergency response training shall satisfy this training requirement and be documented in the training plan (Part I.E.6.d.(5)); and
- Employees and contractors hired by BCC who apply pesticides and herbicides shall be trained and certified in accordance with the Virginia Pesticide Control Act (§ 3.2-3900 et seq. of the Code of Virginia). Certification by the Virginia Department of Agriculture and Consumer Services (VDACS) Pesticide and Herbicide Applicator program shall constitute compliance with this requirement. Contracts for the application of pesticide and herbicides executed after the effective date of this permit shall require contractor certification (Part I.E.6.d.(6)).

BCC shall maintain documentation of each training activity conducted by BCC to fulfill the requirements of Part I.E.6.d for a minimum of three years after the training activity completion. The documentation shall include the following information (Part I.E.6.e):

- The date when applicable employees have completed the training activity (Part I.E.6.e.(1));
- The number of employees who have completed the training activity (Part I.E.6.e.(2)); and
- The training objectives and good housekeeping procedures required under Part I.E.6.a covered by training activity (Part I.E.6.e.(3)).

BCC may fulfill the training requirements in Part I.E.6.d, in total or in part, through regional training programs involving two or more MS4 permittees; however, BCC shall remain responsible for ensuring compliance with the training requirements (Part I.E.6.f).

BCC provides the applicable employees with a Good Housekeeping and Pollution Prevention training video, knowledge check quiz, and a training completion log via SurveyMonkey.

Training required by the General Permit that is not applicable to BCC includes the following:

- Training to employees in and around recreational facilities (Part I.E.6.d.(3)); and
- Emergency responders such as firefighters and law-enforcement officers, trained on the handling of spill control and response as part of a larger emergency response training (Part I.E.6.d.(5)).

BCC provides the applicable employees with a Good Housekeeping and Pollution Prevention and Illicit Discharge and Elimination training video and a knowledge check quiz. BCC does not have any recreational facilities; and although BCC has campus police they are required to call Chesterfield County emergency responders trained in handling spill control and emergency response. See Table 7 for training of applicable employees within the permit cycle. Training is documented in the MS4 Tracking spreadsheet.

<b>Table 7: Anticipated Training</b>			
<b>Permit Requirement</b>	<b>Employee Type</b>	<b>Training Type</b>	<b>Method</b>
Part I.E.6.d.(1), (2) & (4)	Facilities Maintenance	IDDE, GHPP & SWPPP	Video module
Part I.E.6.d.(6)	Pesticide Applicators	Pesticide certification	In-person or virtual class

**Necessary documentation for implementation:** (1) Training documentation or appropriate certifications for employees; (2) IDDE Manual; and (3) Good Housekeeping/Pollution Prevention Program Manual.

**Responsible individual for implementation:** BCC Director of Facilities and Safety

**Implementation schedule:** Training for illicit discharge and good housekeeping will occur no less than every 24 months. Certifications will be maintained, and proof of certification updated as appropriate.

**Measurable goals:** Effectiveness will be determined by the training occurring no less than every 24 months, and proof of certifications updated as appropriate.

## **BMP 6.5 Campus Stormwater Pollution Prevention Plan (Part 1.E.6.g)**

**Description:** Within 12 months (November 1, 2024) BCC shall identify any new high-priority facilities located in expanded 2020 census urban areas with a population of at least 50,000 (Part 1.E.6.g); and within 36 months (November 1, 2026) BCC shall implement SWPPPs for high-priority facilities meeting the conditions of Part 1.E.6.i and which are located in expanded 2020 census urban areas with a population of at least 50,000 (Part 1.E.6.h). BCC shall maintain and implement a site-specific SWPPP for each high priority facility as defined in 9VAC25-890-1 that does not have or require separate VPDES permit coverage, and which any of the following materials or activities occur and are expected to have exposure to stormwater resulting from rain, snow, snowmelt or runoff (Part 1.E.6.i):

- Areas where residuals from using, storing or cleaning machinery or equipment remain and are exposed to stormwater (Part 1.E.6.i.(1));
- Materials or residuals on the ground or in stormwater inlets from spills or leaks (Part 1.E.6.i.(2));
- Material handling equipment (Part 1.E.6.i.(3));
- Materials or products that would be expected to be mobilized in stormwater runoff during loading or unloading or transporting activities (e.g., rock, salt, fill dirt) (Part 1.E.6.i.(4));
- Materials or products stored outdoors (except final products intended for outside use where exposure to stormwater does not result in the discharge of pollutants) (Part 1.E.6.i.(5));
- Materials or products that would be expected to be mobilized in stormwater runoff contained in open, deteriorated or leaking storage drums, barrels, tanks, and similar containers (Part 1.E.6.i.(6));
- Waste material except waste in covered, nonleaking containers (e.g., dumpsters) (Part 1.E.6.i.(7));
- Application or disposal of process wastewater (unless otherwise permitted) (Part 1.E.6.i.(8)); or
- Particulate matter or visible deposits of residuals from roof stacks, vents or both not otherwise regulated (i.e., under an air quality control permit) and evident in the stormwater runoff (Part 1.E.6.i.(9)).

Each SWPPP as required in Part 1.E.6.g shall include the following (Part 1.E.6.j):

- A site description that includes a site map identifying all outfalls, direction of stormwater flows, existing source controls, and receiving water bodies (Part 1.E.6.j.(1));
- A description and checklist of the potential pollutants and pollutant sources (Part 1.E.6.j.(2));
- A description of all potential non-stormwater discharges (Part 1.E.6.j.(3));
- A description of all structural control measures, such as stormwater management facilities and other pollutant source controls, applicable to SWPPP implementation (e.g., permeable pavement or oil-water separators that discharge to sanitary sewer are not applicable to the SWPPP), such as oil-water separators, and inlet protection designed to address potential pollutants and pollutant sources at risk of being discharged to the MS4 (Part 1.E.6.j.(4));
- A maintenance schedule for all stormwater management facilities and other pollutant source controls applicable to SWPPP implementation described in Part 1.E.6.h.(4) (Part 1.E.6.j.(5));
- Site specific written procedures designed to reduce and prevent pollutant discharge that incorporate by reference applicable good housekeeping procedures required under Part 1.E.6.a and b (Part 1.E.6.j.(6));
- A description of the applicable training as required in Part 1.E.6.d.(4) (Part 1.E.6.j.(7));
- An inspection frequency of no less often than once per year and maintenance requirements for site specific source controls. The date of each inspection and associated findings and follow-up shall be logged in each SWPPP (Part 1.E.6.j.(8));

- A log of each unauthorized discharge, release, or spill incident reported in accordance with Part IV G including the following information (Part I.E.6.j.(9)):
  - Date of incident;
  - Material discharged, released, or spilled; and
  - Estimated quantity discharged, released or spilled.
- A log of modifications to the SWPPP made as the result of any unauthorized discharge, release, or spill in accordance Part I.E.6.j or changes in facility activities and operation requiring SWPPP modification (Part I.E.6.j.(10)); and
- The point of contact for SWPPP implementation (Part I.E.6.j.(11)).

No later than June 30 of each year, BCC shall annually review any high-priority facility owned or operated by the BCC for which an SWPPP has not been developed to determine if the facility meets any of the conditions described in Part I.E.6.g. If the facility is determined to need an SWPPP, BCC shall develop an SWPPP meeting the requirements of Part I.E.6.h no later than December 31 of that same year. BCC shall maintain a list of all high-priority facilities owned or operated by BCC not required to maintain an SWPPP in accordance with Part I.E.6.g and this list shall be available upon request (Part I.E.6.k).

BCC shall review the contents of any site-specific SWPPP no later than 30 days after any unauthorized discharge, release, or spill reported in accordance with Part IV G to determine if additional measures are necessary to prevent future unauthorized discharges, releases, or spills. If necessary, the SWPPP shall be updated no later than 90 days after the unauthorized discharge (Part I.E.6.l).

The SWPPP shall be kept at the high-priority facility and utilized as part of employee SWPPP training required in Part I.E.6.d(4). The SWPPP and associated documents may be maintained as a hard copy or electronically as long as the documents are available to employees at the applicable site (Part I.E.6.m).

If activities change at a facility such that the facility no longer meets the definition of a high-priority facility, BCC may remove the facility from the list of high-priority facilities with a high potential to discharge pollutants (Part I.E.6.n).

If activities change at a facility such that the facility no longer meets the criteria requiring SWPPP coverage as described in Part I.E.6.g, BCC may remove the facility from the list of high-priority facilities that require SWPPP coverage (Part I.E.6.o).

BCC will not apply any deicing agent containing urea or other forms of nitrogen or phosphorus to parking lots, roadways, and sidewalks, or other paved surfaces (Part I.E.6.b.(1)(b)).

The SWPPP will provide instruction for updates, as necessary, to reflect changes on campus, modifications to operations and maintenance procedures, or shortcomings resulting in a reportable spill. Inspection forms will be completed in accordance with the prescribed schedule within the SWPPP and maintained on file with the Director of Facilities and Safety and kept with the SWPPP at each campus. The MS4 Tracking spreadsheet documents any spills and subsequent modifications to the SWPPPs.

BCC shall provide a list of all high-priority facilities owned or operated by BCC required to maintain a SWPPP in accordance with Part I.E.6.g that includes the facility name, facility location, and the location of the SWPPP hardcopy or electronic document being maintained. The SWPPP for each high-priority facility shall be incorporated by reference (Part I.E.6.x.(2)).

<b>Table 8: List of High Priority Facilities</b>		
<b>High Priority Facility</b>	<b>Address</b>	<b>Location of SWPPP</b>
Midlothian Campus	800 Charter Colony Parkway, Midlothian, VA 23114	Midlothian Campus Hamel Hall (Director of Facilities and Safety) and Facilities Building (Facility Supervisor & Grounds Supervisor)
Chester Campus	13101 Route 1, Chester, VA 23831	Chester Campus Nicholas Center (Director of Facilities and Safety) and Facilities Building (Facility Supervisor & Grounds Supervisor)

**Necessary documentation for implementation:** (1) Good Housekeeping & Pollution Prevention Manual; (2) Campus-specific SWPPP; and (3) SWPPP inspection forms.

**Responsible individual for implementation:** BCC Director of Facilities and Safety

**Implementation schedule:** By June 30<sup>th</sup> every year BCC will review its properties to determine if the facilities meet the criteria of a high priority facility and develop a SWPPP by December 31 of the same permit year. BCC will also review its properties to determine if the properties no longer meet the criteria of a high priority facility. BCC will review the campus SWPPP no later than 30 days after an unauthorized discharge, release or spill reported in accordance with Part IV.G to determine if additional measures are necessary to prevent future unauthorized discharges, releases, or spills. The SWPPP shall be updated no later than 90 days after the unauthorized discharge. The SWPPP inspection will be completed once per year.

**Measurable goals:** Effectiveness will be measured by the completed SWPPP inspection once per year; a review of the SWPPP within 30 days after an unauthorized discharge, release or spill reported; and an update to the SWPPP within 90 days after an unauthorized discharge. In addition, effectiveness will be measured by the review of BCC's properties to determine if the properties meet the criteria of a high priority facility and a SWPPP is developed, or no longer meet the criteria of a high priority facility.

## **BMP 6.6 Turf and Landscape Management (Part I.E.6.p)**

**Description:** BCC applies nutrients to lands regulated under § 10.1-104.4 of the Code of Virginia; and therefore, shall continue to implement turf and landscape nutrient management plans in accordance with this statutory requirement (Part I.E.6.p and w).

If nutrients are being applied to achieve final stabilization of a land disturbance project, application shall follow the manufacturer's recommendations. For newly established turf where nutrients are applied to a contiguous area greater than one acre, BCC shall implement a nutrient management plan no later than six months after the site achieves final stabilization (Part I.E.6.s). BCC shall implement a Department of Conservation and Recreation (DCR) approved and campus-specific Nutrient Management Plan (NMP) prepared by a Certified Nutrient Management Planner (Part I.E.6.t). Fertilizer application records will be maintained with each application using the application record provided in the NMP.

Nutrient management plans that are expired as of the effective date of this permit shall be submitted to DCR for renewal within six months (May 1, 2024) after the effective date of this permit. Thereafter, all nutrient management plans shall be submitted to DCR at least 30 days prior to nutrient management plan expiration. Within 36 months (November 1, 2026) of permit coverage, no nutrient management plans maintained by BCC in accordance with Part I.E.6.n shall be expired due to DCR documented noncompliance with 4VAC50-85-130 provided to BCC (Part I.E.6.u).

Nutrient management plans may be maintained as a hard copy or electronically as long as the documents are available to employees at the applicable site (Part I.E.6.v).

BCC shall provide a list of locations for which turf and landscape nutrient management plans are required in accordance with Part I.E.6.p and s, including the following information (Part I.E.6.x.(3)):

- The total acreage covered by each nutrient management plan (Part I.E.6.x.(3)(a));
- The DCR approval date and expiration date for each nutrient management plan (Part I.E.6.x.(3)(b)); and
- The location of the nutrient management plan hardcopy or electronic document being maintained (Part I.E.6.x.(3)).

<b>Table 9: List of Lands where Nutrient Management Plans are Required</b>				
<b>Property Name</b>	<b>Total Area (ac.)</b>	<b>DCR Approval Date</b>	<b>Expiration Date</b>	<b>Location of NMPs</b>
Midlothian Campus	20.48	2/12/2025	3/1/2028	Midlothian Campus Hamel Hall (Director of Facilities and Safety) and Facilities Building (Facility Supervisor & Grounds Supervisor)
Chester Campus	15.5	2/12/2025	3/1/2028	Chester Campus Nicholas Center (Director of Facilities and Safety) and Facilities Building (Facility Supervisor & Grounds Supervisor)

**Necessary documentation for implementation:** (1) Nutrient Management Plan; and (2) Completed Fertilizer Application Record.

**Responsible individual for implementation:** BCC Director of Facilities and Safety

**Implementation schedule:** The NMP will continue to be updated and modified as needed. Fertilizer application records will be maintained with each application.

**Measurable goals:** Effectiveness will be measured by the implementation of the NMP through completion of the application record and periodic updates to the NMP to make necessary adjustments based on soil conditions.

### 3.1 SPECIAL CONDITIONS FOR THE CHESAPEAKE BAY TMDL

#### BMP CB-SC.1 Chesapeake Bay TMDL Action Plan (Part II.A)

**Description:** A third phase reduction of at least 60% of the L2 Scoping Run based on lands within the 2000 and 2010 expanded Census urbanized areas required by October 31, 2028 (Part II.A.3.(iv)).

No later than October 31, 2028, BCC shall offset 100% of the increased loads from new sources initiating construction between July 1, 2009 and October 31, 2023, and designed in accordance with 9VAC25-870 Part II.C (9VAC25-870-93 et seq.) if the following conditions apply (Part II.A.4):

- The activity disturbed one acre or greater (Part II.A.4.a); and
- The resulting total phosphorous load was greater than 0.45 lb./acre/year, which is equivalent to an average land cover condition of 16% impervious cover (Part II.A.4.b).

BCC shall utilize Table 4 of Part II.A.5 to develop the equivalent pollutant load for new sources of nitrogen meeting the requirements of this condition.

No later than October 31, 2028, BCC shall offset the increased loads from projects grandfathered in accordance with 9VAC25-870-48 that begin construction after July 1, 2014, if the following conditions apply (Part II.A.5):

- The activity disturbs one acre or greater; and
- The resulting total phosphorous load was greater than 0.45 lb./acre/year, which is equivalent to an average land cover condition of 16% impervious cover.

BCC shall utilize Table 4 of Part II.A.5 to develop the equivalent pollutant load for grandfathered sources of nitrogen meeting the requirements of this condition.

Reductions achieved in accordance with the General VPDES Permit for Discharges of Stormwater from Small Municipal Separate Storm Sewer Systems effective July 1, 2013, and November 1, 2018, shall be applied toward the total reduction requirements to demonstrate compliance with Part II.A.3, A.4, and A.5 (Part II.A.6). 40% of L2 reductions for total nitrogen and total phosphorus shall be maintained by BCC during the permit term (Part II.A.7). Reductions shall be achieved in each river basin as calculated in Part II.A.3 or for reductions in accordance with Part II.A.4 and A.5 in the basin in which the new source or grandfathered project occurred (Part II.A.8). Loading and reduction values greater than or equal to 10 pounds calculated in accordance with Part II.A.3, A.4, and A.5 shall be calculated and reported to the nearest pound without regard to mathematical rules of precision. Loading and reduction values of less than 10 pounds reported in accordance with Part II.A.3, A.4, and A.5 shall be calculated and reported to two significant digits (Part II.A.9).

Reductions required in Part II.A.3, A.4, and A.5 shall be achieved through one or more of the following (Part II.A.10):

- BMPs approved by the Chesapeake Bay Program (Part II.A.10.a);
- BMPs approved by the department (Part II.A.10.b); or
- A trading program described in Part II.A.11 (Part II.A.10.c).

BCC may acquire and use total nitrogen and total phosphorus credits in accordance with § 62.1-44.19:21 of the Code of Virginia for purposes of compliance with the required reductions in Table 3a, Table 3b, Table 3c, and Table 3d of Part II.A.3; Part II.A.4; and Part II.A.5, provided the use of credits has been approved by the department. The exchange of credits is subject to the following requirements (Part II.A.11):

- The credits are generated and applied to a compliance obligation in the same calendar year (Part II.A.11.a);
- The credits are generated and applied to a compliance obligation in the same tributary (Part II.A.11.b);
- The credits are acquired no later than June 1 immediately following the calendar year in which the credits are applied (Part II.A.11.c);
- No later than June 1 immediately following the calendar year in which the credits are applied, BCC certifies on an MS4 Nutrient Credit Acquisition Form that BCC has acquired the credits (Part II.A.11.d); and
- Total nitrogen and total phosphorus credits shall be either point source credits generated by point sources covered by the Watershed Permit for Total Nitrogen and Total Phosphorus Discharges and Nutrient Trading in the Chesapeake Bay Watershed general permit issued pursuant to § 62.1-44.19:14 of the Code of Virginia or nonpoint source credits certified pursuant to § 62.1-44.19:20 of the Code of Virginia (Part II.A.11.e).

No later than 12 months (November 1, 2024) after the permit effective date, BCC shall submit a third phase Chesapeake Bay TMDL Action Plan for the reductions required in Part II.A.3, A.4, and A.5. (Part II.A.12.b):

- Any new or modified legal authorities, such as ordinances, permits, policy, specific contract language, orders, and interjurisdictional agreements, implemented or needing to be implemented to meet the requirements of Part II.A.3, A.4, and A.5 (Part II.A.12.b.(1));
- The load and cumulative reduction calculations for each river basin calculated in accordance with Part II.A.3, A.4, and A.5 (Part II.A.12.b.(2));
- The total reductions achieved as of November 1, 2023, for each pollutant of concern in each river basin (Part II.A.12.b.(3));
- A list of BMPs implemented prior to November 1, 2023, to achieve reductions associated with the Chesapeake Bay TMDL, including (Part II.A.12.b.(4)):
  - The date of implementation (Part II.A.12.b.(4)(a)); and
  - The reductions achieved (Part II.A.12.b.(4)(b)).
- The BMPs to be implemented by BCC within 60 months (November 1, 2028) of the effective date of this permit to meet the cumulative reductions calculated in Part II.A.3, A.4, and A.5, including as applicable (Part II.A.12.b.(5)):
  - Type of BMP (Part II.A.12.b.(5)(a));
  - Project name (Part II.A.12.b.(5)(b));
  - Location (Part II.A.12.b.(5)(c));
  - Percent removal efficiency for each pollutant of concern (Part II.A.12.b.(5)(d));
  - Calculation of the reduction expected to be achieved by the BMP calculated and reported in accordance with the methodologies established for each pollutant of concern (Part II.A.12.b.(5)(e)); and
  - A preliminary schedule for implementation of the BMPs included in the Chesapeake Bay TMDL action plan (Part II.A.12.b.(5)(f)).

- A summary of any comments received as a result of public participation required in Part II.A.13, BCC's response, identification of any public meetings to address public concerns, and any revisions made to Chesapeake Bay TMDL action plan as a result of public participation (Part II.A.12.b.(6)).

Prior to submittal of the action plan required in Part II.A.12.a and b, BCC shall provide an opportunity for public comment for no fewer than 15 days on the additional BMPs in the third phase Chesapeake Bay TMDL action plan (Part II.A.13).

Within 60 months (November 1, 2028) after permit issuance, BCC shall update the Phase III Chesapeake Bay TMDL action plan to offset the increased loads from new sources initiating construction between July 1, 2009, and October 31, 2023, that are located in the expanded 2020 census urban areas with a population of at least 50,000, and within BCC's MS4 service area, and designed in accordance with 9VAC25-870 Part II.C (9VAC25-870-93 et seq.), if the following conditions apply (Part II.A.15):

- The activity disturbed one acre or greater (Part II.A.15.a); and
- The resulting total phosphorous load was greater than 0.45 pounds per acre per year, which is equivalent to an average land cover condition of 16% impervious cover (Part II.A.15.b).

BCC shall utilize Table 4 of Part II.A.5 to develop the equivalent nitrogen pollutant load for new sources meeting the requirements of this condition.

Within 60 months (November 1, 2028) after permit issuance, BCC shall update the Phase III Chesapeake Bay TMDL action plan to offset the increased loads from projects grandfathered in accordance with 9VAC25-870-48 that are located in the expanded 2020 census urban areas with a population of at least 50,000, and within BCC's MS4 service area, and began construction after July 1, 2014, if the following conditions apply (Part II.A.16):

- The activity disturbs one acre or greater (Part II.A.15.a); and
- The resulting total phosphorous load was greater than 0.45 pounds per acre per year, which is equivalent to an average land cover condition of 16% impervious cover (Part II.A.15.b).

BCC shall utilize Table 4 of Part II.A.6 to develop the equivalent nitrogen pollutant load for grandfathered sources meeting the requirements of this condition.

**Necessary documentation for implementation:** (1) Third phase Chesapeake Bay TMDL Action Plan; (2) Summary of public comments and BCC's responses; and (3) Program Plan Updates, as necessary.

**Responsible individual for implementation:** BCC Director of Facilities and Safety

**Implementation schedule:** No later than 12 months (November 1, 2024), BCC shall submit a third phase Chesapeake Bay TMDL Action Plan including reductions of at least 60% of the L2 Scoping Run based on lands within the 2000 and 2010 expanded CUA. Within 60 months (November 1, 2028) BCC shall offset the increased loads from new sources and grandfathered projects located in the expanded 2020 CUA.

**Measurable goal:** Effectiveness will be determined by the consideration of public comments; and the selection of cost effective BMPs supported by model quantification to achieve the required pollutant reductions.

## **BMP CB-SC.2 Chesapeake Bay TMDL Action Plan Annual Status Report (Part II.A.14)**

**Description:** BCC will submit a Chesapeake Bay TMDL implementation annual status report in a method (i.e., how BCC must submit) and format (i.e., how the report shall be laid out) as specified by the department no later than October 1 of each year. The report shall cover the previous year from July 1 to June 30 (Part II.A.14.a).

Following notification from the department of the start date for the required electronic submission of Chesapeake Bay TMDL implementation annual status reports, as provided for in 9VAC25-31-1020, such forms and reports submitted after that date shall be electronically submitted to the department in compliance with 9VAC25-31-1020 and this section. There shall be at least a three-month notice provided between the notification from the department and the date after which such forms and reports must be submitted electronically (Part II.A.14.b).

The year two Chesapeake Bay TMDL implementation annual status report shall contain a summary of any public comments on the Chesapeake Bay TMDL action plan received and how BCC responded (Part II.A.14.c).

Each Chesapeake Bay TMDL implementation annual status report shall include the following information (Part II.A.14.d):

- A list of Chesapeake Bay TMDL action plan BMPs, not including annual practices, implemented prior to the reporting period that includes the following information for reported BMP (Part II.A.14.d.(1));
  - The number of BMPs for each BMP type (Part II.A.14.d.(1)(a));
  - The estimated reduction of pollutants of concern achieved by each BMP type and reported in pounds of pollutant reduction per year (Part II.A.14.d.(1)(b)); and
  - A confirmation statement that BCC electronically reported Chesapeake Bay TMDL action plan BMPs inspected using the DEQ BMP Warehouse in accordance with Part III.B.5 (Part II.A.14.d.(1)(c)).
- A list of newly implemented BMPs including annual practices implemented during the reporting period that includes the following information for each reported BMP or a statement that no BMPs were implemented during the reporting period (Part II.A.14.d.(2));
  - The BMP type and a description of the location for each BMP (Part II.A.14.d.(2)(a));
  - The estimated reduction of pollutants of concern achieved by each BMP and reported in pounds of pollutant reduction per year (Part II.A.14.d.(2)(b)); and
  - A confirmation statement that BCC electronically reported BMPs using the DEQ BMP Warehouse in accordance with Part III.B.3 (Part II.A.14.d.(2)(c)).
- If BCC acquired credits during the reporting period to meet all or a portion of the required reductions in Part II A 3, A 4, or A 5, a statement that credits were acquired (Part II.A.14.e).
- Pollutant load reductions generated by annual practices, such as street and storm drain cleaning, shall only be applied to the compliance year in which the annual practice was implemented (Part II.A.14.f).
- The progress, using the final design efficiency of the BMPs, toward meeting the required cumulative reductions for total nitrogen and total phosphorus (Part II.A.14.g).
- Any revisions made to the Chesapeake Bay TMDL action plan (Part II.A.14.h).
- A list of BMPs that are planned to be implemented during the next reporting period (Part II.A.14.i).

**Necessary documentation for implementation:** Third phase Chesapeake Bay TMDL Action Plan

**Responsible individual for implementation:** BCC Director of Facilities and Safety

**Implementation schedule:** The third phase Chesapeake Bay TMDL Action Plan Implementation Annual Report will be submitted to DEQ no later than October 1 of each year.

**Measurable goal:** Effectiveness will be determined by the submittal of the third phase Chesapeake Bay TMDL Action Plan Implementation Annual Status Report.

### 3.2 SPECIAL CONDITIONS FOR LOCAL TMDLS

**Description:** BCC shall develop and maintain a local TMDL action plan designed to reduce loadings for pollutants of concern if BCC discharges the pollutants of concern to an impaired water for which a TMDL has been approved by the U.S. Environmental Protection Agency (EPA) as described below (Part II.B.2):

- For TMDLs approved by EPA prior to July 1, 2018, and in which an individual or aggregate wasteload has been allocated to BCC, BCC shall develop and initiate or update as applicable the local TMDL action plans to meet the conditions of Part II.B.4, B.6, B.7, and B.8, as applicable, no later than 18 months (May 1, 2025) after the permit effective date and continue implementation of the action plan; Updated action plans shall include (Part II.B.2.a):
  - An evaluation of the results achieved by the previous action plan (Part II.B.2.a.(1)); and
  - Any adaptive management strategies incorporated into updated action plans based on action plan evaluation (Part II.B.2.a.(2)).
- For TMDLs approved by EPA on or after July 1, 2018, and prior to October 31, 2023, and in which an individual or aggregate wasteload has been allocated to BCC, BCC shall develop and initiate implementation of action plans to meet the conditions of Part II.B.4, B.5, B.6, B.7, and B.8, as applicable no later than 30 months (May 1, 2026) after the permit effective date (Part II.B.2.b). BCC shall complete implementation of the TMDL action plans as determined by the schedule. TMDL action plans may be implemented in multiple phases over more than one permit cycle using the adaptive iterative approach provided adequate progress is achieved in the implementation of BMPs designed to reduce pollutant discharges in a manner that is consistent with the assumptions and requirements of the applicable TMDL (Part II.B.3).

BCC shall complete implementation of the TMDL action plans as determined by the schedule. TMDL action plans may be implemented in multiple phases over more than one permit cycle using the adaptive iterative approach provided adequate progress is achieved in the implementation of BMPs designed to reduce pollutant discharges in a manner that is consistent with the assumptions and requirements of the applicable TMDL (Part II.B.3).

Each local TMDL action plan developed by BCC shall include the following (Part II.B.4):

- The TMDL project name (Part II.B.4.a);
- The EPA approval date of the TMDL (Part II.B.4.b);
- The wasteload allocated to BCC (individually or in aggregate), and the corresponding percent reduction, if applicable (Part II.B.4.c);
- Identification of the significant sources of the pollutants of concern discharging to the MS4 that are not covered under a separate VPDES permit. For the purposes of this requirement, a significant source of pollutants of concern means a discharge where the expected pollutant loading is greater than the average pollutant loading for the land use identified in the TMDL (Part II.B.4.d);
- The BMPs designed to reduce the pollutants of concern in accordance with Parts II.B.5, B.6, B.7, and B.8 (Part II.B.4.e);
- Any calculations required in accordance with Part II.B.5, B.6, B.7, or B.8 (Part II.B.4.f);
- For action plans developed in accordance with Part II.B.5, B.6, and B.8, an outreach strategy to enhance the public's education (including employees) on methods to eliminate and reduce discharges of the pollutants (Part II.B.4.g); and
- A schedule of anticipated actions planned for implementation during this permit term (Part II.B.4.h).

Prior to submittal of the action plan required in Part II.B.2, BCC shall provide an opportunity for public comment for no fewer than 15 days on the proposal to meet the local TMDL action plan requirements (Part II.B.9).

The MS4 program plan as required by Part I.B of this permit shall incorporate each local TMDL action plan. Local TMDL action plans may be incorporated by reference into the MS4 program plan provided that the program plan includes the date of the most recent local TMDL action plan and identification of the location where a copy of the local TMDL action plan may be obtained (Part II.B.9).

For each reporting period, each annual report shall include a summary of actions conducted to implement each local TMDL action plan (Part II.B.9).

### BMP SC1.1 Local Bacteria TMDL Action Plans (Part II.B.5)

**Description:** BCC is a nontraditional permittee, therefore, BCC shall select at least one strategy listed in Table 10 designed to reduce the load of bacteria to the MS4 relevant to sources of bacteria applicable within the MS4 regulated service area. Selection of the strategies shall correspond to sources identified in Part II.B.4.d (Part II.B.5.b).

Table 10: Strategies for Bacteria Reduction Stormwater Control/Management Strategy	
Source	Strategies (provided as an example and not meant to be all inclusive or limiting)
Domestic pets (dogs and cats)	<p>Provide signage to pick up dog waste, providing pet waste bags and disposal containers.</p> <p>Adopt and enforce pet waste ordinances or policies, or leash laws or policies.</p> <p>Place dog parks away from environmentally sensitive areas.</p> <p>Maintain dog parks by removing disposed of pet waste bags and cleaning up other sources of bacteria.</p> <p>Protect riparian buffers and provide unmanicured vegetative buffers along streams to dissuade stream access.</p>
Urban wildlife	<p>Educate the public on how to reduce food sources accessible to urban wildlife (e.g., manage restaurant dumpsters and grease traps, residential garbage, feed pets indoors).</p> <p>Install storm drain inlet or outlet controls.</p> <p>Clean out storm drains to remove waste from wildlife.</p> <p>Implement and enforce urban trash management practices.</p> <p>Implement rooftop disconnection programs or site designs that minimize connections to reduce bacteria from rooftops.</p> <p>Implement a program for removing animal carcasses from roadways and properly disposing of the same (either through proper storage or through transport to a licensed facility).</p>
Illicit connections or illicit discharges to the MS4	<p>Implement an enhanced dry weather screening and illicit discharge, detection, and elimination program beyond the requirements of Part I E 3 to identify and remove illicit connections and identify leaking sanitary sewer lines infiltrating to the MS4 and implement repairs.</p> <p>Implement a program to identify potentially failing septic systems.</p> <p>Educate the public on how to determine whether their septic system is failing.</p> <p>Implement septic tank inspection and maintenance program.</p> <p>Implement an educational program beyond any requirements in Part I.E.1 though Part I.E.6 to explain to citizens why they should not dump materials into the MS4.</p>

Source	Strategies (provided as an example and not meant to be all inclusive or limiting)
Dry weather urban flows (irrigations, car washing, powerwashing, etc.)	<p>Implement public education programs to reduce dry weather flows from storm sewers related to lawn and park irrigation practices, car washing, powerwashing and other nonstormwater flows.</p> <p>Provide irrigation controller rebates.</p> <p>Implement and enforce ordinances or policies related to outdoor water waste.</p> <p>Inspect commercial trash areas, grease traps, washdown practices, and enforce corresponding ordinances or policies.</p>
Birds (Canadian geese, gulls, pigeons, etc.)	<p>Identify areas with high bird populations and evaluate deterrents, population controls, habitat modifications and other measures that may reduce bird-associated bacteria loading.</p> <p>Prohibit feeding of birds.</p>
Other sources	<p>Enhance maintenance of stormwater management facilities owned or operated by the permittee.</p> <p>Enhance requirements for third parties to maintain stormwater management facilities.</p> <p>Develop BMPs for locating, transporting, and maintaining portable toilets used on permittee-owned sites. Educate third parties that use portable toilets on BMPs for use.</p> <p>Provide public education on appropriate recreational vehicle dumping practices.</p>

**Necessary documentation for implementation:** James River Tidal Bacteria TMDL Action Plan

**Responsible individual for implementation:** BCC Director of Facilities and Safety

**Implementation schedule:** Update the James River Tidal Bacteria TMDL Action Plan no later than 18 months (May 1, 2025) after the permit effective date and continue implementation of the action plan.

**Measurable goal:** Effectiveness will be determined by the consideration of public comments; and the selection of cost effective BMPs and outreach strategies to enhance the public's education.

### **BMP SC1.2 Local Bacteria TMDL Action Plan Implementation (Part II.B.5)**

**Description:** BCC will implement a strategy annually per the schedule in the James River Tidal Bacteria TMDL Action Plan.

**Necessary documentation for implementation:** James River Tidal Bacteria TMDL Action Plan

**Responsible individual for implementation:** BCC Director of Facilities and Safety

**Implementation schedule:** The implementation of the James River Tidal Bacteria TMDL Action Plan will be according to the schedule in Table 11.

<b>Table 11: James River Tidal Bacteria TMDL Action Plan Implementation</b>	
<b>Strategy</b>	<b>Method</b>
Educate the public on how to reduce food sources accessible to urban wildlife.	PowerPoint Slides displayed on TVs on Campus.

**Measurable goal:** Effectiveness will be determined by the implementation of the actions in the schedule.

### 3.3 DEQ BMP Warehouse Reporting

**Description:** No later than October 1 of each year BCC shall electronically report new BMPs implemented and inspected as applicable between July 1 and June 30 of each year using the DEQ BMP Warehouse (Part III.B).

BCC shall use the associated reporting template for stormwater management facilities not reported in accordance with Part III.B.5, including stormwater management facilities installed to control post-development stormwater runoff from land disturbing activities less than one acre in accordance with the Chesapeake Bay Preservation Area Designation and Management Regulations (9VAC25-830), if applicable, and for which a General VPDES Permit for Discharges of Stormwater from Construction Activities was not required (Part III.B.1).

BCC shall use the DEQ BMP Warehouse to report BMPs that were not reported in accordance with Part III.B.1 or B.5 and were implemented as part of a TMDL action plan to achieve nitrogen, phosphorus, and total suspended solids reductions in accordance with Part II.A or B (Part III.B.2).

BCC shall use the DEQ BMP Warehouse to report:

- any BMPs that were not reported in accordance with Part III.B.1, B.2, or B.5 (Part III.B.3).
- the most recent inspection date for BMPs in accordance with Part I.E.5.b or 5.c, or in accordance with Part II.C and the most recent associated TMDL action plan (Part III.B.4).

The following information for each new BMP reported in accordance with Part III.B.1, B.2, B.3, or B.5 shall be reported to the DEQ BMP Warehouse as applicable (Part III.C):

- The BMP type (Part III.C.1);
- The BMPs location as decimal degree latitude and longitude (Part III.C.2);
- The acres treated by the BMP, including total acres and impervious acres (Part III.C.3);
- The date the BMP was brought online (MM/YYYY). If the date brought online is not known, BCC shall use 06/2005 (Part III.C.4);
- The 6th Order Hydrologic Unit Code in which the BMP is located (Part III.C.5);
- Whether the BMP is owned or operated by BCC or privately owned (Part III.C.6);
- Whether or not the BMP is part of BCC's Chesapeake Bay TMDL action plan required in Part II.A or local TMDL action plan required in Part II B, or both (Part III.C.7);
- If the BMP is privately owned, whether a maintenance agreement exists (Part III.C.8);
- The date of BCC's most recent inspection of the BMP (Part III.C.9); and
- Any other information specific to the BMP type required by the DEQ BMP Warehouse (e.g., linear feet of stream restoration) (Part III.C.1).

No later than October 1 of each year, BCC shall electronically report the most recent inspection date for any existing BMP that was previously reported and re-inspected between July 1 and June 30 using the BMP Warehouse. If an existing BMP has not been previously reported, the BMP shall be reported as new in accordance with Part III.B and Part III.C (Part III.D).

No later than October 1 of each year the DEQ BMP Warehouse shall be updated if an existing BMP is discovered between July 1 and June 30 that was not previously reported to the DEQ BMP Warehouse (Part III.E).

**Necessary documentation for implementation:** (1) SWM Facility Inventory

**Responsible individual for implementation:** BCC Director of Facilities and Safety

**Implementation schedule:** No later than October 1 of each year, BCC shall electronically report the most recent inspection date for any existing BMP that was previously reported and re-inspected between July 1 and June 30 using the BMP Warehouse.

**Measurable goal:** Effectiveness will be measured by the annually reported information by October 1 each year.

**Appendix A: VCCS Standards and Specifications DEQ Approval Letter**



*Commonwealth of Virginia*

*VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY*

[www.deq.virginia.gov](http://www.deq.virginia.gov)

Travis A. Voyles  
Secretary of Natural and Historic Resources

Michael S. Rolband, PE, PWD, PWS Emeritus  
Director

September 18, 2024

Ms. Shelley Bains, VCCO  
Capital Outlay Program Manager  
Virginia Community College System  
300 Arboretum Place, Suite 390  
Richmond, VA 23236

Re: Standards and Specifications (S&S) Agreement for Virginia Community College System (VCCS)  
S&S Agreement No. SS044

Transmitted electronically: [sbains@vccs.edu](mailto:sbains@vccs.edu)

Dear Ms. Bains,

The Virginia Department of Environmental Quality (DEQ) has reviewed the VCCS Standards and Specifications (S&S) for Erosion and Sediment Control (ESC) and Stormwater Management (SWM), dated July 1, 2024 and received by the DEQ Office of Stormwater Management on July 8, 2024. The S&S Agreement is deemed approved for ESC and SWM pursuant to the Virginia Erosion and Stormwater Management Act (§ 62.1-44.15:24 et seq.) and associated regulations (9VAC25-875-10 et seq.).

Approval of Standards and Specifications by DEQ does not relieve the owner or operator of the duty to comply with other applicable local, state or federal ordinances or regulations. Additionally, approval of this S&S is set to expire five (5) years from the date of this document on September 18, 2029 unless otherwise specified by DEQ or where there are changes requiring DEQ review and approval.

Please note that the approved S&S for ESC and SWM are subject to the following requirements:

1. Variance, waiver, and exception requests must be submitted to DEQ separately from the July 1, 2024 S&S document. DEQ may require project-specific plans associated with requests to be submitted for review and approval.
2. Electronic notification must be sent to DEQ at least two weeks prior to the initiation of any land-disturbing activities subject to approved S&S. Notifications shall be submitted via email to: [standardsandspecs@deq.virginia.gov](mailto:standardsandspecs@deq.virginia.gov).
  - 1) Project name and any associated Construction General Permit number;
  - 2) Project location (including nearest intersection, latitude and longitude, or access point);
  - 3) On-site project manager name and contact information;
  - 4) Responsible Land Disturber (RLD) name and contact information;
  - 5) Project description;
  - 6) Acreage of disturbance for the project;
  - 7) Anticipated project start and finish dates; and
  - 8) Any deviations/variances/exceptions/waivers associated with the project.

September 18, 2024

Re: Virginia Community College System S&S Agreement

Page 2 of 2

3. In addition to the two weeks prior land disturbance notification described above, a semiannual linear project tracking report of all active projects, including acreage, initiated under this S&S agreement shall be submitted via email to [standardsandspecs@deq.virginia.gov](mailto:standardsandspecs@deq.virginia.gov) by January 15<sup>th</sup> and July 15<sup>th</sup> of each year through the duration of this approval, including ongoing, previously reported projects.
4. ESC and SWM plans must be reviewed by DEQ-Certified Plan Reviewers. VCCS, as the S&S holder, retains the authority to approve plans and must do so in writing. Should VCCS, as an S&S holder, contract with a third-party to fulfill the plan review function, the certified third-party Plan Reviewer may recommend approval of the plan, but final approval must come from VCCS, as the S&S holder.

To ensure compliance with approved S&S for ESC and SWM, and the Virginia Erosion and Stormwater Management Act and attendant regulation, DEQ staff will conduct random site inspections, respond to complaints, and provide on-site technical assistance with specific ESC and SWM measures and plan implementation.

As provided by Rule 2A:2 of the Rules of the Supreme Court of Virginia, you have thirty (30) days from the date of receipt within which to appeal this decision by filing a notice of appeal in accordance with the Rules of the Supreme Court of Virginia with the Director, Virginia Department of Environmental Quality.

To ensure an efficient exchange and response to inquiries, DEQ Central Office is your primary point of contact. Central Office staff will coordinate with our Regional Office staff as appropriate. Please contact Tony Angueira at (804)-584-6265 or [antony.angueira@virginia.deq.gov](mailto:antony.angueira@virginia.deq.gov) if you have any questions about this letter.

Sincerely,



April Rhodes  
Program Manager, Office of Stormwater Management  
Virginia Department of Environmental Quality  
(571) 866-6091  
[april.rhodes@deq.virginia.gov](mailto:april.rhodes@deq.virginia.gov)  
1111 East Main Street, Suite 1400  
Richmond, Virginia 23219  
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cc: DEQ-OSWM  
Steven J. L'Heureux, RA, VCCO, VCA [slheureux@vccs.edu](mailto:slheureux@vccs.edu)