

# VIRGINIA PENINSULA COMMUNITY COLLEGE

## **Municipal Separate Storm Sewer System Annual Report**

**Reporting Period: July 1, 2021 to June 30, 2022**

Date: October 1, 2022

General Permit No. VAR040087


Effective Date: November 1, 2018 through October 31, 2023.

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**Annual Report Certification**

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

Printed Name: Steven R. Carpenter

Signature: 

Title: Vice President for Finance and Administration

Date: 9/28/2022

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## Background and Purpose

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

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

**Table 1. General information required for annual reporting.**

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

## Compliance Summary

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

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

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

<sup>1</sup> Refer to BMP section within this program plan for full description and requirements for each BMP.

## Minimum Control Measure Annual Reporting

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

### MCM 1: Public Education and Outreach

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

#### BMP 1A – Public Education & Outreach Plan

Annual reporting associated with this BMP requires:

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

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

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

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

Results from Public Survey		
<i>Two assessment surveys: (1) Focused on material for WQ issues # 1 &amp; #2 distributed to all of the VPCC public. (2) Focused on WQ issue #3 distributed to applicable staff. Next survey to assess improvement of scores will be in the spring of 2023. Since the 2019 survey, the public score decreased slightly from 79% to 76% and the staff score also decreased slightly from 95% to 94%.</i>		
Date Distributed: <i>(1) 9/16/21 and (2) 9/13/21</i>	Number of Respondents: <i>(1) 78 and (2) 5</i>	Average Score: <i>(1) 76% and (2) 94%</i>

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

## MCM 2: Public Involvement and Participation

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

### BMP 2A – Dedicated MS4 Webpage

Annual reporting associated with this BMP requires:

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

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

Dedicated Stormwater Webpage Reporting	
Link to current MS4 Program and Stormwater pollution prevention webpage: <a href="https://VPCC.edu/about/environment/stormwater">https://VPCC.edu/about/environment/stormwater</a>	
An annual review of the website conducted to ensure all information required to be posted on the website was performed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Description of updates implemented during the reporting year: <i>Since the previous reporting period, VPCC has added the 2020-2021 MS4 Annual Report.</i>	

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



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

Annual reporting associated with this BMP requires:

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

<b>Illicit Discharge Reports<sup>1</sup></b>		
Number of instances: <i>0</i>	Number of instances closed: <i>N/A</i>	Percent of instances closed: <i>N/A</i>
<b>Public Input on Program Plan<sup>2</sup></b>		
Number of instances: <i>0</i>	Number of responses: <i>N/A</i>	Percent of instances responded to: <i>N/A</i>

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

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

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

**BMP 2C – Public Involvement/Participation Activities**

Annual reporting associated with this BMP requires:

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

<b>Public Involvement/Participation Activities</b>			
<b>Involvement Type<sup>1</sup></b>	<b>Description of activity<sup>2</sup></b>	<b>Report on the Metric to measure benefit to water quality</b>	<b>Beneficial to Improving water quality?</b>
<i>Pollution prevention</i>	<i>Implementation and maintenance of storm drain marker program.</i>	<i>All inlets marked. A minimum of 20% of markers inspected and maintained annually.</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>Pollution prevention</i>	<i>Installation and maintenance of pet waste stations.</i>	<i>Continued utilization and maintenance of 8 pet waste stations.</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>Disposal or collection events</i>	<i>12/6/21 liter &amp; debris collection from BMP areas and ditches on campus.</i>	<i>4 large trash bags filled.</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>Disposal or collection events</i>	<i>3/8/22 liter &amp; debris collection from BMP areas and ditches on campus.</i>	<i>6 large trash bags filled.</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

<sup>1</sup> A minimum of two involvement types must be used annually.

<sup>2</sup> VPCC did not collaborate with any other MS4 permittees for any of the listed activities.

<b>Summary of BMP Effectiveness based on Program Plan Measurable Goal</b>	
Does the measure of BMP effectiveness require Program Plan modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If yes, please described necessary BMP modifications to improve effectiveness: N/A	

**MCM 3: Illicit Discharge Detection and Elimination**

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

**BMP 3A – Maintain MS4 Map and Information Table**

Annual reporting associated with this BMP requires:

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

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

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

**BMP 3B – Prohibition of Unauthorized Non-stormwater Discharges**

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

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

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

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

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

Annual reporting associated with this BMP requires:

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

<b>Outfall Screening &amp; IDDE Procedure Effectiveness</b>	
Total number of outfalls screened as part of dry weather screening program.	<i>11</i>
Total number of VPCC outfalls.	<i>11</i>
Were 100% of outfalls screened during the reporting year?	<i>Yes</i>

<b>Effectiveness Assessment for Addressing Illicit Discharges</b>	
Were all instances of identified illicit discharge closed?	
<i>N/A - None identified.</i>	

**MCM 4: Construction Site Stormwater Runoff Control**

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

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

Annual reporting associated with this BMP requires:

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

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

<b>ESC Inspections &amp; Enforcement Summary</b>	
Total number of ESC inspections conducted: <i>39 (Templin Hall Emergency Demolition Project)</i>	
Were any enforcement actions taken during the reporting year?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

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

Annual reporting associated with this BMP requires:

- ✓ The total number of illicit discharges originating from land disturbance activity of the total illicit discharge reports (Illicit Discharge Investigation forms in Appendix A if > zero); and
- ✓ Any potential changes to the subsequent annual standards and specifications to prevent future occurrences.

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

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

**MCM 5: Post-construction SWM for Development**

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

**BMP 5A – Address Post-construction Stormwater Runoff**

Annual reporting associated with this BMP requires:

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

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

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



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

Annual reporting associated with this BMP requires:

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

<b>SWM Facility Inspections and Maintenance</b>	
Total number of inspections conducted on SWM facilities for the reporting year is: 2	
Was at least one inspection performed on each VPCC SWM facility during the reporting year?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were any significant maintenance, repair, or retrofit activities necessary to ensure the BMP performs as designed as a result of inspection?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Provide the BMP ID and a description of any significant maintenance, including an assessment of the timeliness of the needed actions. <ul style="list-style-type: none"> <li>• <i>No significant maintenance/repair problems identified. Significant maintenance items listed from past inspections have been addressed. VPCC also continued phragmites treatment to address invasive specific during the reporting period. VPCC has also contracted H2R Engineering to develop a plan for removing sediment from BMP #1 forebay.</i></li> </ul>	

**BMP 5C – Maintain SWM Facilities Spreadsheet**

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

**BMP 5D –SWM Facilities Reporting to DEQ**

Annual reporting associated with this BMP requires:

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

<b>Certification Statement: Report to Virginia Construction Stormwater General Permit Database (Not Applicable for Reporting Year)</b>	
<p>Confirmation Statement: <i>“VPCC submitted SWM facility information through the Virginia Construction Stormwater General Permit database for those land disturbing activities for which coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities was required in accordance with the VCCS Standards and Specifications for ESC and SWM.”</i></p>	<p><input type="checkbox"/> Yes   <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</p>

<sup>1</sup> Not applicable since no projects were completed during the reporting year that required coverage; or if an applicable project was completed, a stormwater management facility was not installed as part of the project. See following certification statement.

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

<b>Certification Statement: Report to Virginia Construction Stormwater General Permit Database (Not Applicable for Reporting Year)</b>	
<p>Confirmation Statement: <i>“VPCC either did not complete any projects during the reporting period requiring coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities; or, if a project was completed, a stormwater management facility was not installed as part of the project.”</i></p>	<p>Marked box below is confirmation <input checked="" type="checkbox"/></p>

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

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

**MCM 6: Pollution Prevention & Good Housekeeping for Facilities**

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

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

Annual reporting associated with this BMP requires:

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

<b>Effectiveness of Program to Prevent Illicit Discharges from Campus Operations</b>	
Were there any illicit discharges from BMP 3C reporting that originated from campus operations of maintenance activities?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Total number of illicit discharges originating from campus operations of maintenance activities:	0
Describe any potential changes to the <i>VPCC Staff Handbook for Good Housekeeping and Pollution Prevention</i> to prevent future occurrences, if applicable. <i>N/A</i>	

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

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

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

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

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

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

Annual reporting for this BMP will include a summary of any new NMPs developed, including

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

<b>Nutrient Management</b>	
Did VPCC apply nutrients during the reporting year?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p><i>VPCC has, and implements, a Nutrient Management Plan for the Hampton campus for a total of 23.3 acres that was approved by the Department of Conservation and Recreation on August 24, 2021 and is valid through June 30, 2024.</i></p> <p><i>VPCC has, and implements, a Nutrient Management Plan for the Historic Triangle campus for a total of 8.0 acres that was approved by the Department of Conservation and Recreation on August 24, 2021 and is valid through July 30, 2024.</i></p>	

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

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

Annual reporting for this BMP requires:

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

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

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

**BMP 6E – Training Plan for Applicable Employees**

Annual reporting associated with this BMP requires:

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

<b>Good Housekeeping/Pollution Prevention Training</b>	
Date of latest training event:	<i>September 23, 2022</i>
Date of previous training:	<i>July 13, 2020</i>
Has training continued to be provided every other year?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Number of employees that attended the latest training event.	<i>4</i>
Number of employees identified to be required to participate in training (as defined by the general permit and program plan).	<i>4</i>
Percent of those identified that attended training.	<i>100%</i>
Did the percentage of those identified to be required to attend training attend?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
A description of the objective of the latest training event: <i>Familiarize staff with the MS4 program, recognition and reporting of illicit discharges, the Staff Handbook for Good Housekeeping and Pollution Prevention, and priority areas on campus.</i>	
Average quiz score from latest training event.	<i>91% (increase from 90% with last training)</i>

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



## Special Conditions for Total Maximum Daily Load Waste Load Allocations

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

### BMP SC1 – Chesapeake Bay TMDL Action Plan

Annual reporting associated with this BMP requires the following:

- ✓ BMPs implemented during the reporting period (street sweeping);
- ✓ Progress towards meeting the required cumulative reductions in the Action Plan;
- ✓ A list of BMPs to be implemented the following reporting year (street sweeping); and
- ✓ Any revisions made to the Action Plan during the reporting year.

Chesapeake Bay TMDL Action Plan Annual Reporting			
<p><i>Street sweeping was implemented in accordance with the Phase II Action Plan. A total of 2.50 tons of sweepings were collected for the reporting period. Equivalent TP, TN, and TSS reductions are partially based on results of sampling of swept material by MS4s statewide, including VPCC, as presented by Hixon and Dymond (2019) in the manuscript entitled, “Characterization of Street Sweeping Material for Addressing Total Maximum Daily Load Allocations” as published by the ASCE Journal of Sustainable Water in the Built Environment. DOI: 10.1061/JSWBAY.0000882. Refined reduction quantification is based on median values including continued sampling results and the fraction of material susceptible to runoff summarized in the following table:</i></p>			
	TP	TN	TSS ( $\leq 841 \mu\text{m}$ )
Days Since Rain	(lbs/ton) <sup>1</sup>	(lbs/ton) <sup>1</sup>	(lbs/ton) <sup>2</sup>
$\leq 2$	0.044	1.188	794 (39.7%)
$> 2$	0.324	1.336	1,308 (65.4%)
<p><sup>1</sup> Values applied to material swept <math>&lt; 841 \mu\text{m}</math> (computed with last column).  <sup>2</sup> Adjusted using a moisture content of 2.2% to compute dry weight, the median value measured in samples presented by Hixon and Dymond (2019).</p>			
Pollutant	Annual Reductions Required by 2023 (lbs/yr)		Reductions achieved this year (lbs.)
TN	15.0		0.53
TP	4.15		2.18
TSS	1,483		3,270
Are reductions progressing to achieve targets?			No
<p><i>Sweeping was significantly lower the past 2 reporting periods and the level of sweeping needed deemed not feasible for VPCC. A CB TMDL Reassessment report has identified nutrient credit purchase during the 2022-2023 reporting period necessary for the full required reductions.</i></p>			
Were any modifications made to the action plan?			Yes, as described above.

**BMP SC2 – Back River Bacteria TMDL Action Plan**

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

<b>Back River Bacteria TMDL Action Plan Status Report</b>	
<p><i>VPCC was assigned a WLA equivalent to a 0% reduction of their existing bacteria loadings. The VPCC Back River Bacteria TMDL Action Plan requires:</i></p> <ol style="list-style-type: none"> <li><i>1. Continued implementation of MS4 Program BMPs with the potential to minimize bacteria loadings;</i></li> <li><i>2. Maintaining pet waste stations on the Hampton Campus; and</i></li> <li><i>3. Modifications to applicable supporting program documents to incorporate bacteria as a local TMDL pollutant of concern.</i></li> </ol> <p><i>During the reporting period, VPCC:</i></p> <ul style="list-style-type: none"> <li><i>• Continued implementation of the applicable MS4 Program Plan BMPs described in the Action Plan and</i></li> <li><i>• Maintained the pet waste stations at the Hampton Campus.</i></li> </ul> <p><i>Modifications to applicable supporting program documents, as described in the Action Plan, are scheduled to be completed during the spring of 2023.</i></p>	
Is the Action plan being implemented?	Yes
Were any modifications made to the action plan?	No
Plan Updates: <i>None this reporting period.</i>	