Municipal Separate Storm Sewer System Program Plan

Parham Road Campus

2023-2028 Permit Cycle

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BACKGROUND AND PURPOSE

J. Sargeant Reynolds Community College (JSRCC) 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 to convey stormwater downstream. The MS4 also includes stormwater management facilities to mitigate flooding and water quality concerns downstream. Ultimately stormwater discharged from MS4 is introduced 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. JSRCC is authorized to discharge stormwater runoff from the Parham Road campus MS4 under the Virginia Stormwater Management Program regulations, Virginia Pollutant Discharge Elimination System Regulations (VPDES), and the Virginia State Water Control Law.

JSRCC has been issued permit coverage to discharge stormwater by the Virginia Department of Environmental Quality (DEQ) and in accordance with the General VPDES Permit for Discharges of Stormwater from Small MS4s (General Permit). Compliance with the General Permit requires JSRCC to develop, implement, and enforce an MS4 program designed to:

- Reduce the discharge of pollutants from the MS4 to the maximum extent practicable (MEP) in accordance with the General Permit,
- Protect water quality, and
- Satisfy the appropriate water quality requirements of the State Water Control Law and its attendant regulations.

This Program Plan serves as the guiding document of the college's MS4 program, describing the means and methods the college implements to maintain compliance with the General Permit. The Program Plan is required to include a description of the best management practices (BMPs) to address permit-specific requirements for the following minimum control measures (MCMs):

1. Public Education and Outreach
2. Public Involvement and Participation
3. Illicit Discharge Detection and Elimination
4. Construction Site Stormwater Runoff Control
5. Post-construction Stormwater Management
6. Pollution Prevention and Good Housekeeping

In addition to the MCMs, an MS4 may also be subject to special condition requirements for total maximum daily load (TMDL) waste load allocations (WLA). General Permit Special Conditions are applicable to JSRCC for the following TMDL for which WLAs have been assigned to the college:

- ✓ Chesapeake Bay TMDL with WLAs for total phosphorus (TP), total nitrogen (TN), and total suspended solids (TSS) specified in the General Permit; and the
- ✓ E. coli TMDL Development for Chickahominy River and Tributaries, dated August 2012 and approved by the EPA on September 19, 2012.

Implementation of the JSRCC MS4 Program Plan presented herein constitutes compliance with the standard of reducing pollutants to the MEP, provides adequate progress in meeting water quality standards, and satisfies the appropriate water quality requirements of the State Water Control Law and its attendant regulations.

Program Structure

This MS4 Program Plan is structured to address each requirement in the General Permit. Specifically, for each MCM, the General Permit requires the Program Plan to include:

- ✓ Each specific requirement listed for the MCM in the General Permit;
- ✓ A description of the BMPs or strategies that JSRCC anticipates will be implemented to demonstrate compliance for each requirement;
- ✓ Standard operating procedures (SOPs) or policies necessary to implement each BMP, including a list of documents incorporated by reference, along with the version and date of the document;
- ✓ The measurable goal by which each BMP or strategy will be evaluated; and
- ✓ The persons, positions, or departments responsible for implementing each BMP or strategy to ensure permit requirements are met.

At this time, JSRCC is not dependent on another entity to implement portions of the MS4 program and the JSRCC Buildings and Grounds Manager for Facilities Management and Planning is responsible for the implementation of each program BMP described herein. If these responsibilities change throughout the permit cycle, JSRCC will update this Program Plan to incorporate a written agreement with a description of each party's roles and responsibilities for program implementation, as required by the General Permit.

In addition to the information explicitly provided in the JSRCC MS4 Program Plan, supporting documents are also incorporated by reference and include the:

- ➢ JSRCC Staff Handbook of Good Housekeeping and Pollution Prevention, dated March 14, 2024 (includes written procedures for illicit discharge detection and elimination (IDDE), good housekeeping/pollution prevention and inspections and maintenance for stormwater management facilities);

- Virginia Community College System (VCCS) Annual Standards and Specifications for Erosion and Sediment Control (ESC) and Stormwater Management (SWM), latest DEQ-approved version of March 10, 2021;
- JSRCC Phase II Chesapeake Bay TMDL Action Plan, dated October 28, 2019;
- JSRCC Chickahominy River and Tributaries Bacteria TMDL Action Plan, dated April 30, 2020;
- JSRCC MS4 mapping and outfall information table for the Parham Road campus, dated February 28, 2024;
- JSRCC Nutrient Management Plans, Department of Conservation and Recreation approval date of October 6, 2021, with expiration date of October 6, 2024; and
- Others as described herein.

The latest versions of the supporting documents incorporated into the Program Plan will be maintained on the JSRCC stormwater management webpage. As part of an iterative program to reduce pollutant loadings and protect water quality to the MEP, revisions to the MS4 Program and supporting documents may occur throughout the permit cycle. Any updates to supporting documents and this Program Plan will be provided on the webpage within 30 days, as required by the General Permit.

Annual Reporting

JSRCC is required by the General Permit to submit an annual report to the Virginia DEQ no later than October 1st of each year that reports on program implementation from July 1st to June 30th of the previous year. To ensure appropriate information is maintained to address permit-specific requirements for annual reporting for each MCM, reporting requirements are identified within this Program Plan for each program BMP. Reporting requirements are also included to ensure consistency with measurable goals described herein for each program BMP. Annual reporting shall be submitted in a method and format specified by DEQ.

Schedule and Roles/Responsibilities

Table 1 summarizes the critical scheduling items and responsible position or department for each BMP incorporated into this Program Plan to address the conditions of the General Permit.

Table 1. Summary of critical time frames for implementation of each BMP.

BMP # [1]	Summary of Description of Critical Item [2]	Timeframe
1A	Initial Public & Staff Surveys	Spring semester 2024
1A	Outreach for high-priority issue #1	Spring semester, annually
1A	Outreach for high-priority issue #2	Fall semester, annually
1A	Outreach for high-priority issue #3	Spring semester, annually
1A	Second Public & Staff Surveys	Spring semester 2026
1A	Final Public & Staff Surveys	Spring semester 2028
2A	Maintain dedicated webpage	Ongoing per BMP description
2B	Receive/respond to public reports/input	Ongoing per BMP description
2C	Public Participation Event #1	Spring semester, annually
2C	Public Participation Event #2	Ongoing per BMP description
2C	Public Participation Event #3	Fall semester, annually
2C	Public Participation Event #4	Spring semester, annually
3A	Update MS4 Map and Information Table	Updated. Maintain per BMP description
3A	Maintain MS4 Map and Information Table.	Updated. Maintain per BMP description
3B	Prohibition of nonstormwater discharges	Ongoing per BMP description
3C	Perform dry weather outfall screenings	Annually, by June 30
3C	Document illicit discharge occurrences	Ongoing per BMP description
4A	Implement VCCS Stnds. & Specs for ESC & SWM	Ongoing for land disturbance activity
4B	Implement VCCS Stnds. & Specs for ESC & SWM	Ongoing for land disturbance activity
5A	Implement VCCS Stnds. & Specs for ESC & SWM	Ongoing for land disturbance activity
5B	Conduct annual SWM Facility Inspections	Annually, by June 30
5C	SWM Facility Reporting to DEQ	Annually, by October 1
6A	Implement Good Housekeeping Procedures	Ongoing. Update completed for new permit
6B	Conduct annual campus-wide SWPPP Evaluation	Annually, by June 30
6C	Implement Nutrient Management Plan	During application of nutrients
6C	Maintain current approved NMP	Updated plan by 10/6/24 (in progress)
6D	Ensure contract language for controls	For any qualifying contracts per BMP
6E	Conduct MS4 employee training	Fall, 2024, 2026, 2028
SC1	CB TMDL Action Plan Update/Implementation	Update plan by 11/1/24 (implemented)
SC2	Bacteria TMDL Update	Update plan by 5/1/25; implement annually
* Submit Annual Report annually by October 1st and post on the webpage by annually by November 1st *		

[1] JSRCC Buildings and Grounds Manager for Facilities Management and Planning is responsible for implementation of each BMP.

[2] Refer to BMP section within this program plan for full description and requirements for each BMP.

MCM 1: Public Education and Outreach

In accordance with the General Permit to address MCM 1, JSRCC will implement the following BMPs:

BMP 1A – Public Education & Outreach Plan

JSRCC has identified 3 high priority stormwater issues to incorporate into the college's public education and outreach program. For each high priority stormwater issue, a strategy to educate the target audience most likely to have stormwater impacts is selected from **Table BMP-1A-1** below, as required by the General Permit. The General Permit requires the information in **Table BMP-1A-2** to be included in this Program Plan for each identified high priority stormwater issues.

Table BMP-1A-1. Strategies for Public Education and Outreach per the General Permit.

Strategies[1]	**Examples** (provided as examples and are not meant to be all inclusive or limiting)
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, bill boards, 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 SWM, voluntary residential low impact development, or other stormwater issues

[1]Two or more of the strategies must be used each year (i.e. all strategies cannot be signage).

Table BMP-1A-2. High-priority stormwater issues.

High Priority Stormwater Issue	Rationale for Selection & Intended Positive Impact to Water Quality	Target Audience[1]	Strategy and Time Period[2]
1. General Public Education on: ✓ Stormwater Impacts to Surface Waters and ✓ Steps to Reduce Pollution	Selected based on the results of a Fall 2023 survey of the JSRCC public that found a need for general information regarding stormwater runoff impact to surface waters (i.e. 59% of respondents were unaware stormwater discharges into local waterways). Public knowledge of the general impacts is expected to positively impact water quality by changing habits that may have previous, and unknowingly, caused a negative impact.	Students, Faculty, & Staff	Traditional Materials (Spring Semester)
2. Illicit Discharge Prohibition and Enforcement on the JSRCC Campus: ✓ Disciplinary Implications ✓ Reporting, ✓ Hazards, and ✓ Proper Waste Disposal	Selected due to the need to inform of the illicit discharge prohibition and enforcement mechanisms in place for the JSRCC public. Knowledge of prohibition and consequences are expected to discourage the public from willingly causing an illicit discharge and being aware of the importance for reporting suspected incidents. Increasing knowledge regarding the prohibition and enforcement of illicit discharges will minimize the potential for occurrences, thus having a positive impact on water quality.	Students, Faculty, & Staff	Signage - slides on closed-circuit TV monitors in campus facilities (Fall Semester)
3. Increase the applicable staff's knowledge regarding pollutants of concern for local TMDLs and the Chesapeake Bay TMDL	Selected since consistent with the General Permit that specifies the public education and outreach plan prioritize reducing impacts to local impairments. Potential to contribute bacteria, nutrients, or sediment via discharge of the JSRCC MS4s is most applicable to activities conducted by the grounds staff component of JSRCC's public. Increased knowledge by groups on campus most likely to have significant impacts is expected to have a positive impact on water quality by minimizing potential for TMDL pollutants to be discharged from the MS4.	Staff	Traditional Materials (Spring to balance between training that occurs in fall)

[1] For the purposes of the community college, JSRCC's overall public is defined as students, faculty, and staff.
[2] May vary annually based on resources. However, a minimum of two strategy types from Table BMP-1A-1 will be implemented annually amongst the strategy types for the three high priority issues.

Necessary SOPs or Policy for BMP 1A

This Program Plan and the General Permit serve as the written guidance, or policy, for implementation of this BMP. The description of this BMP defines the JSRCC public education and outreach program.

Measurable Goals for BMP 1A Evaluation

To measure effectiveness of the BMP, JSRCC will conduct a public survey, disseminated electronically via email, to gauge the anticipated increase in the JSRCC's public knowledge. Two separate surveys will be disseminated, as follows:

- ✓ A survey incorporating questions related to stormwater impacts to surface water quality and illicit discharge prohibition and enforcement to gauge progress for the high priority water quality issues #1 and #2. This survey will be distributed to the JSRCC public identified for these issues during the first year of the permit cycle to establish a baseline and again in the third and final year of the permit cycle to provide information to assess effectiveness.
- ✓ A survey incorporating questions related to TMDL pollutants of concern (nutrients, sediment and bacteria) to gauge progress for the high priority water quality issue #3. This survey will be distributed to the JSRCC staff identified as the target audience for this issue in the first year of the permit cycle to establish a baseline and again in the third and final year of the permit cycle to provide information to assess effectiveness.

Results of the surveys described will be considered for determining any necessary modifications to BMP 1A. If modifications are necessary, changes will be made to this BMP and an updated Program Plan provided on the JSRCC stormwater website within 30 days of the modification.

Annual Reporting for BMP 1A

JSRCC will provide annual reporting consistent with the requirements in the General Permit. Annual reporting associated with this BMP shall include:

- ✓ A list of the high-priority stormwater issues JSRCC addressed during the reporting year.
- ✓ A summary of the public education and outreach activities conducted for the report year, including the strategies used to communicate the identified high-priority issues.
- ✓ A description of any changes in high-priority stormwater issues, including, strategies used to communicate high-priority stormwater issues or target audiences for the public education and outreach plan. A rationale shall be provided for any of these changes.
- ✓ The public survey results described for use as a measure of effectiveness.

MCM 2: Public Involvement and Participation

In accordance with the General Permit to address MCM 2, JSRCC will implement the following BMPs:

BMP 2A – Dedicated MS4 Webpage

JSRCC will maintain a dedicated MS4 Program and stormwater webpage dedicated at:
https://www.reynolds.edu/who_we_are/about/environmental_sustainability/ms4.html
As required by the permit, the webpage will provide the following:

- ✓ A mechanism/procedure, in the form of a regularly monitored email address, or reporting form, and a hotline phone number, for the public to:
  - (1) Report potential illicit discharges, improper disposal, or spills to the MS4. The webpage will also include general information defining an MS4 and illicit discharges.
  - (2) Report complaints regarding land disturbance activities occurring on campus.
  - (3) Report other stormwater pollution concerns.
  - (4) Provide comments on the MS4 Program Plan and Chesapeake Bay TMDL Action Plan.
- ✓ The MS4 General Permit and the DEQ MS4 General Permit coverage letter provided to JSRCC.
- ✓ The latest version of this MS4 Program Plan.
- ✓ All MS4 Annual Reports for the General Permit term. The annual reports will be posted on the webpage within 30 days of submittal to DEQ each year, or no later than November 1st.
- ✓ Latest JSRCC Chesapeake Bay TMDL Action Plan.
- ✓ Each annual Chesapeake Bay TMDL implementation annual status report for the permit cycle, posted no later than November 1st each year.

Necessary SOPs or Policy for BMP 2A

This Program Plan serve as the written guidance, or policy, for implementation of this BMP. No other SOPs are necessary. The webpage will facilitate the mechanism and procedures for public reporting.

Measurable Goal for BMP 2A Evaluation

Effectiveness of this BMP will be measured by an annual evaluation that tracks the maintenance and updating of the webpage, as described in the BMP.

Annual Reporting for BMP 2A

Annual reporting associated with this BMP shall include:

- ✓ The current JSRCC MS4 Program and stormwater pollution prevention webpage address.
- ✓ 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 is posted and maintained with the latest versions of documents.

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

JSRCC staff will implement the following procedures to receive and respond to public input:

- ✓ For comments/reports regarding potential illicit discharges, improper disposal, spills to the MS4, and complaints regarding land disturbance activities, maintain documentation electronically for annual reporting. Documentation shall include:
  (1) The source of and potential illicit discharge;
  (2) The dates that the discharge was observed, reported, or both;
  (3) Method of discovery;
  (4) Resolution of the investigation;
  (5) A description of any follow-up activities; and
  (6) The date the investigation was closed.
- ✓ For comments regarding non-illicit discharge related stormwater pollution concerns, the MS4 Program Plan and Chesapeake Bay TMDL Action Plan, maintain documentation electronically for annual reporting. Documentation shall include:
  (1) The reported input or compliant, if electronically submitted or submitted in writing, or a written summary of any verbally submitted input or complaint;
  (2) The date the input or complaint was provided;
  (3) A description of any modification(s) to the Program Plan, if applicable, and the rationale as to why any modifications were made or not made; and
  (4) A copy of the written response provided to the individual or group submitting the input.

Necessary SOPs or Policy for BMP 2B

This BMPs and the JSRCC Staff Handbook for Good Housekeeping and Pollution Prevention serve as the SOPs for this BMP. The webpage will facilitate the mechanism and procedures for public reporting.

Measurable Goal for BMP 2B Evaluation

Effectiveness of this BMP will be measured by the annual percentage of: (1) closure of reported illicit discharges and (2) responses provided regarding input/complaint of regarding the program.

Annual Reporting for BMP 2B

Reporting will include:

- ✓ Summary of public comments on MS4 program received with JSRCC responses, as applicable.
- ✓ Summary of stormwater pollution complaints received with JSRCC responses, as applicable.
- ✓ Each potential illicit discharge report and percentage of reports closed.
- ✓ Each instance of public input and percent for which JSRCC provided response.
- ✓ Assessment of all illicit discharges not closed and instances of public comment without response.

BMP 2C – Public Involvement/Participation Activities

In **Table BMP-2C**, below, JSRCC has identified four public involvement activities to be implemented, promoted, participated in, or coordinated, along with the following information for each activity:

- ✓ A description of each activity;
- ✓ The anticipated time period each activity will occur; and
- ✓ A metric for each activity to determine if the activity is beneficial to water quality.
- ✓ Description of how the activity benefits water quality.

Of the public involvement activity "opportunity types" listed in Table 2 of the MS4 General Permit, at least two types must be utilized each year of the four required activities (i.e. all 4 events cannot be an "educational event").

Table BMP-2C-1. Public involvement opportunity types and examples.

Opportunity Types [1]	Description of Activity [2]	Anticipated time period [2]	Metric to Measure Benefit to Water Quality
1. Restoration	Campus Clean-up Day	Spring or Fall Semester	Number of student and staff participants and estimate of trash collected. Water quality benefit is direct removal of trash that could end up in surface waters.
2. Pollution Prevention	Install/maintain cigarette butt stations with stormwater message displayed on them.	Ongoing with intermittent inspection and maintenance.	Number of stations annually maintained. Estimate of cigarette butts collected (pounds).
3. Public Education Activity	Campuswide public-invite for stormwater education presentation.	Fall Semester	Number of participants. Water quality benefit realized through educating on stormwater quality intended to impact participant activities that could introduce pollutants to surface waters.
4. Pollution prevention	Implement a storm drain marking program.	Annual campus inspection and restoration of markers in spring semester.	Number of student and staff participants. Markings are inherently anticipated to improve water quality, acting a signage to prohibit introducing illicit discharges to the MS4.

[1] JSRCC may coordinate with other MS4 permittees, but is responsible for meeting the requirements of the BMP.

[2] Activities and timing may change year to year due to various circumstances. In the case of changes, this Program Plan will be updated and the revised plan provided on the JSRCC webpage within 30 days of the change.

Necessary SOPs or Policy for BMP 2C

This Program Plan serves as the written guidance, or policy, for implementation of this BMP. No SOPs are necessary. Table 2 of the General Permit will be utilized to select alternative public involvement types if any of those listed in Table BMP-2C-1 cannot be implemented due to unforeseen circumstances.

Measurable Goal for BMP 2C Evaluation

The metrics described in Table BMP-2C-1 will be used to evaluate the effectiveness of the public involvement activities. In the case the described metrics indicate ineffectiveness, alternative activities will be evaluated and incorporated into the Program Plan, as applicable.

Annual Reporting for BMP 2C

For each public involvement activity implemented during the reporting year, annual reporting will include:

- ✓ 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.
- ✓ The name(s) of any MS4 permittees with whom JSRCC collaborated with on a public involvement opportunity.

MCM 3: Illicit Discharge Detection and Elimination

In accordance with the General Permit to address MCM 3, JSRCC will implement the following BMPs:

BMP 3A – Maintain MS4 Map and Information Table

JSRCC will annually update by October 1st, as applicable, the existing MS4 mapping to include the following:

- ✓ New MS4 outfalls discharging to surface waters;
- ✓ A unique identifier for each required map item;
- ✓ The name and location of receiving waters to which the MS4 outfalls discharge;
- ✓ MS4 regulated service areas; and
- ✓ New stormwater management facilities owned and operated by JSRCC.

JSRCC will annually update by October 1st, as applicable, an outfall information table associated with the MS4 mapping to include the following for each mapped outfall:

- ✓ A unique identifier as specified on the MS4 mapping;
- ✓ The latitude and longitude (decimal degree accuracy to at least the fifth decimal place);
- ✓ The estimated regulated drainage area draining to the outfall or point of discharge;
- ✓ The name of the receiving water and its 6th Order Hydrologic Unit Code.
- ✓ An indication as to whether the receiving water is impaired in the Virginia 2022 305(b)/(d) Water Quality Assessment Integrated Report; and
- ✓ The name of any existing or new EPA approved TMDLs to which a WLA has been assigned to JSRCC.

JSRCC will submit to DEQ a format file geodatabase or two shapefiles that contain at a minimum:

i. A point feature class or shapefile for outfalls with an attribute table containing outfall data elements required in the outfall information table described above; and
ii. 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:
    - MS4 operator name;
    - MS4 permit number (VAR04); and
    - MS4 service area total acreage rounded to the nearest hundredth.

Geodatabase feature classes or shapefiles will be submitted as point data in NAD83 decimal degrees global positioning system coordinates, with data projected in Virginia Lambert Conformal Conic format. Metadata will provide a description of each feature class or shapefile dataset; units of measure as applicable, coordinate system and projection.

The following associated supporting documents are incorporated by reference with this Program Plan and available upon request:

- ✓ MS4 Mapping and Information Table, available on the JSRCC Stormwater Webpage.
- ✓ Copies of written notifications of new physical interconnections. There have been no new interconnections since notifications provided during a previous permit cycle. However, in the case of new interconnections, JSRCC will provide additional written notification to the MS4 regarding the new interconnection(s), including mapping.

Necessary SOPs or Policy for BMP 3A

This Program Plan serves as the written guidance, or policy, for implementation of this BMP. No SOPs are necessary.

Measurable Goal for BMP 3A Evaluation

The MS4 map and information table serve as a tool to help track any observed or reported potential illicit discharges and ensure grounds staff is familiar with the location of the MS4 system components. To ensure the effectiveness as a tool in these capacities, the measurable goal for this BMP is an annually updated map and information table, as described in this BMP.

Annual Reporting for BMP 3A

Annual reporting will include:

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

BMP 3B – Prohibition of Unauthorized Nonstormwater Discharges

JSRCC will prohibit non-stormwater discharges into the storm sewer system through language provided within the college's *Standards of Conduct for Employees* and the *Student Handbook*, each of which provide methods and procedures for: (1) reporting and (2) corrective and disciplinary action. Methods and procedures in these two documents cover the entirety of the JSRCC public. The public, defined as students, faculty, and staff, will be made aware of the prohibition of illicit discharge and disciplinary action as part of the "Illicit Discharge Prohibition and Enforcement on the JSRCC Campus" high priority stormwater issue described in **Table BMP-1A-2** (BMP-1A).

Necessary SOPs or Policies for BMP 3B

These following policies are necessary for implementation of this BMP:

- ✓ Standards of Conduct for Employees
- ✓ Student Handbook

Measurable Goal for BMP 3B Evaluation

The policies prohibiting non-stormwater discharges into the storm sewer system primarily act as a deterrent for the public to purposefully cause an illicit discharge. Secondly, the policies provide a mechanism to implement corrective and disciplinary action, as necessary. For each of these purposes, measurable goals are as follows:

- ✓ A measure of the effectiveness of the BMP as a deterrent will annually be based on the number of illicit discharge instances occurring from a purposeful action by the JSRCC public during the reporting year, compared to previous years, along with consideration of any special circumstances.
- ✓ A measure of the effectiveness of the BMP as a disciplinary tool will annually be measured by an assessment of any disciplinary action taken towards a member of the JSRCC public, when applicable. Assessment will be based on the effectiveness of the disciplinary action to prevent continued instances of the associated illicit discharge purposefully caused by the JSRCC public.

Annual Reporting for BMP 3B

In addition to the annual reporting described for BMP 3C for each instance of an illicit discharge, reporting will include:

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

BMP 3C – Maintain, Implement, Enforce IDDE Written Procedures

JSRCC will continue to maintain, implement, and enforce IDDE written procedures designed to detect, identify, and address unauthorized nonstormwater discharges, including illegal dumping, to the MS4 to effectively eliminate the unauthorized discharge. The written procedures are described in Section 2 of the *JSRCC Staff Handbook of Good Housekeeping and Pollution Prevention* (Staff Handbook) and include the following summarized items, as required by the General Permit:

- ✓ A description of the policies to eliminate ongoing sources of illicit discharges, including with the use of enforcement actions (Section 7, IDDE Program Manual);
- ✓ Dry weather field screening protocols to detect, identify, and eliminate illicit discharges (see Section 2.4, Staff Handbook);
  - Includes annual screening of all of the MS4 outfalls; and
  - Screening data collection forms to track information required by the General Permit;
- ✓ A time frame upon which to conduct an investigation to identify and locate the source of any observed continuous or intermittent non-stormwater discharges prioritized based on potential hazard to human health (see Section 2.5, Staff Handbook);
- ✓ Methodologies to determine the source of all illicit discharges (see Section 2.5, Staff Handbook);
- ✓ Mechanisms to eliminate identified sources of illicit discharges (see Section 2.5, Staff Handbook);
- ✓ Methods for conducting a follow-up investigation in order to verify that the discharge has been eliminated (see Section 2.5, Staff Handbook); and
- ✓ A mechanism to track all investigations that include information required by the General Permit (See Appendices A and B, Staff Handbook).

The Staff Handbook will be maintained on the JSRCC stormwater webpage, described in BMP 2A, and is incorporated into this Program Plan, by reference.

Necessary SOPs or Policies for BMP 3C

These following policies are necessary for implementation of this BMP:

- ✓ Standards of Conduct for Employees
- ✓ Student Handbook
- ✓ JSRCC Staff Handbook of Good Housekeeping and Pollution Prevention, incorporated into this Program Plan by reference.

Measurable Goal for BMP 3C Evaluation

The written IDDE procedures are intended to detect, identify, and eliminate illicit discharges. The measure for evaluation of this BMP will be annual assessment of the percentage of detected illicit

discharges that are identified and eliminated. In the case that a detected illicit discharge is not eliminated, the written procedures will be reviewed to determine if changes are necessary to ensure all detected illicit discharges are eliminated.

Annual Reporting for BMP 3C

Annual reporting will include:

- ✓ 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 IDDE Program Manual to include the following information:
  - The location and 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 Staff Handbook for cases where a detected illicit discharge was not eliminated. A schedule for completing any modification will also be provided.

MCM 4: Construction Site Stormwater Runoff and Erosion & Sediment Control

In accordance with the General Permit to address MCM 4, JSRCC will implement the following BMPs:

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

As a public institution of higher education, JSRCC will address discharges entering the MS4 from regulated construction site runoff with continued implementation of the latest DEQ approved *Virginia Community College System (VCCS) Annual Standards and Specifications for Erosion and Sediment Control (ESC) and Stormwater Management (SWM)*. DEQ's approval of the VCCS Annual Standards and Specifications for ESC and SWM ensures consistency with the:

- ✓ Virginia ESC Law (§ 62.1-44.15:51 et seq. of the Code of Virginia); and the
- ✓ Virginia ESC Regulations (9VAC25-840).

The following will be maintained on the JSRCC stormwater webpage, described in BMP 2A, and are incorporated into this Program Plan, by reference:

- ✓ *VCCS Annual Standards and Specifications for ESC and SWM* that include:
  - A description of the policies to ensure compliance to Virginia ESC Laws and Regulations;
  - Written inspection procedures to ensure the erosion and sediment controls are properly implemented and all associated documents utilized during inspection, including an approved ESC Plan and the inspection schedule;
  - An ESC inspection checklist to document ESC structures and systems are properly maintained and repaired as needed to ensure continued performance of their intended function;
  - Requirement and procedures to ensure employees and contractors serving as plan reviewers, inspectors, program administrators, and construction site operators obtain the appropriate certifications required under the Virginia Erosion and Sediment Control Law and its attendant regulations;
  - Written procedures for requiring compliance through corrective action or enforcement action to the extent allowable; and
  - Roles and responsibilities in implementing the standards and specifications.
- ✓ Copy of the most recent standards and specifications approval letter from DEQ, approved in accordance with § 62.1-44.15:51 of the Code of Virginia.

Necessary SOPs or Policies for BMP 4A

The latest DEQ-approved *VCCS Annual Standards and Specifications for ESC and SWM* include the necessary SOPs and policies for implementation of this BMP. A copy of the most recent standards and specifications approval letter is provided in Appendix A of this program plan.

Measurable Goal for BMP 4A Evaluation

In context to MCM 4, the *VCCS Annual Standards and Specifications for ESC and SWM* are intended to ensure land disturbance activity is compliant to the Virginia ESC Law and Regulations referenced in this BMP's description. With this, effectiveness will be measured with an annual review of all land disturbance activities to ensure each has been conducted in accordance with the current DEQ-approved standards and specifications for ESC. At a minimum, the review will determine if applicable land disturbance activities:

- ✓ Have an approved ESC Plan;
- ✓ Obtained a Construction General Permit when disturbance is ≥ 1-acre; and
- ✓ Have had inspections and enforcement performed as specified by the VCCS standards and specifications.

Annual Reporting for BMP 4A

Annual reporting will include:

- ✓ 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 annual standards and specifications for ESC.
  - In the case a land disturbing project was conducted without DEQ approved annual standards and specifications for ESC, a list will be provided with ESC Plan approval dates for each applicable project.
- ✓ Total number of ESC inspections conducted during the reporting period per applicable land disturbance activity; and
- ✓ The total number of each type of compliance action and enforcement action implemented.

BMP 4B –Controls to Prevent Nonstormwater Discharges during Land Disturbance

JSRCC will require implementation of appropriate controls to prevent nonstormwater discharges to the MS4, such as wastewater, concrete washout, fuels and oils, and other illicit discharges identified during land disturbing activity inspections. The requirement for appropriate controls to prevent nonstormwater discharges during land disturbing activity is implemented by JSRCC through implementation of the latest version of the DEQ approved *VCCS Annual Standards and Specifications for ESC and SWM*. Specifically, Section 3.3.1 of the standards and specifications requires:

- ✓ The implementation of a site-specific stormwater pollution prevention plan (SWPPP), as required by the General Permit for Discharges from Construction Activity (9VAC25-880) for land disturbance activity ≥ 1-acre.

The *VCCS Annual Standards and Specifications for ESC and SWM* require a preconstruction meeting prior to land disturbance, with the completion of *Form LD-03: VCCS Land Disturbance Preconstruction Meeting Form.* The form requires verification of the availability of the site's SWPPP, when applicable. To ensure SWPPP implementation, *Form LD-04B: VCCS Construction Site Inspection Certification Form* is provided in the standards and specifications and used for land disturbance activity inspections. The form includes inspection items related to pollution prevention and the SWPPP.

Necessary SOPs or Policies for BMP 4B

The latest DEQ-approved *VCCS Annual Standards and Specifications for ESC and SWM* define the necessary SOPs and policies for implementation of this BMP.

Measurable Goal for BMP 4B Evaluation

The effectiveness of this BMP will be measured by an assessment of the number of illicit discharges annually observed or reported that originate from land disturbance activity. In the case of continued similar occurrences, the related sections of the standards and specifications will be reviewed in context to the occurrence(s) for potential modifications to prevent future occurrences.

Annual Reporting for BMP 4B

The following will be reported in association with this BMP:

- ✓ The total number of illicit discharges originating from land disturbance activity, provided in reporting for BMP 3C; and
- ✓ Any potential changes to the subsequent annual standards and specifications to prevent future occurrences.

MCM 5: Post-construction SWM for Development

In accordance with the General Permit to address MCM 5, JSRCC will implement the following BMPs:

BMP 5A – Address Post-construction Stormwater Runoff

As a public institution of higher education, JSRCC will address post-construction stormwater runoff that enters the MS4 from land disturbing activities with continued implementation of the latest DEQ approved *VCCS Annual Standards and Specifications for ESC and SWM*. DEQ's approval of the *VCCS Annual Standards and Specifications for ESC and SWM* ensures consistency with the:

- ✓ Virginia SWM Act (§ 62.1-44.15:24 et seq. of the Code of Virginia); and the
- ✓ Virginia SWM Program (VSMP) Regulations (9VAC25-870).

The following will be maintained on the JSRCC stormwater webpage, described in BMP 2A, and are incorporated into this Program Plan, by reference:

- ✓ *VCCS Annual Standards and Specifications for ESC and SWM* that include:
  - A description of the policies to ensure compliance with the Virginia SWM Act and VSMP Regulations;
  - Requirement and procedures to ensure employees and contractors serving as plan reviewers, inspectors, and program administrators maintain the appropriate DEQ certifications required under the Virginia Stormwater Management Act and its attendant regulations;
  - Written inspection and maintenance procedures to ensure SWM facilities are properly designed and constructed; and
  - Roles and responsibilities in implementing the standards and specifications.
- ✓ A copy of the most recent standards and specifications approval letter from DEQ.

Necessary SOPs or Policies for BMP 5A

The latest DEQ-approved *VCCS Annual Standards and Specifications for ESC and SWM* include the necessary SOPs and policies for implementation of this BMP. A copy of the most recent standards and specifications approval letter is provided in Appendix A of this program plan.

Measurable Goal for BMP 5A Evaluation

In context to MCM 5, the *VCCS Annual Standards and Specifications for ESC and SWM* are intended to ensure land disturbance activity is compliant to the Virginia SWM Law and Regulations referenced in this BMP's description. With this, effectiveness will be measured with an annual review of all land disturbance activities to ensure each has been conducted in accordance with the current DEQ-approved

standards and specifications for SWM. At a minimum, the review will determine if applicable land disturbance activities have:

- ✓ An approved SWM Plan, as applicable;
- ✓ A SWM facility record drawing provided upon completion of the project; and
- ✓ A post-construction inspection and maintenance plan is available for each SWM facility.

Annual Reporting for BMP 5A

Annual reporting will include:

- ✓ 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 SWM.
    - ✓ 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.

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

JSRCC will continue to implement an inspection and maintenance program for the college's SWM facilities, as described in the *JSRCC Staff Handbook of Good Housekeeping and Pollution Prevention* (Staff Handbook) and *VCCS Annual Standards and Specifications for ESC and SWM. JSRCC wi*ll continue to inspect all SWM facilities annually, at a minimum. Maintenance will continue to be performed at the frequency specified in the Staff Handbook and as described on inspection forms.

The following will be maintained on the JSRCC stormwater webpage, described in BMP 2A, and is incorporated by reference into this Program Plan:

- ✓ JSRCC Staff Handbook that includes:
  - Written inspection and maintenance procedures and all associated documents utilized during inspection of SWM facilities;
  - Requirement and procedures to ensure employees and contractors serving as plan reviewers, inspectors, and program administrators maintain the appropriate DEQ certifications required under the Virginia Stormwater Management Act and its attendant regulations;
  - Written maintenance procedures; and
  - Roles and responsibilities in implementing the post-construction stormwater runoff control program.
- ✓ VCCS Annual Standards and Specifications for ESC and SWM that requires long-term inspections and maintenance and record retention.
- ✓ A copy of the most recent standards and specifications approval letter from DEQ.

Necessary SOPs or Policies for BMP 5B

The written procedures described within the latest versions of the Staff Handbook and *VCCS Annual Standards and Specifications for ESC and SWM* include the necessary SOPs and policies for implementation of this BMP.

Measurable Goal for BMP 5B Evaluation

The effectiveness of this BMP will be measured by the annual completion of BMP inspection forms and timeliness of conducting any necessary maintenance identified on inspection forms in accordance with the guidance in the Staff Handbook.

Annual Reporting for BMP 5B

Annual reporting will include:

- ✓ Number of inspections (completed forms) conducted on each of JSRCC'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.

BMP 5C –SWM Facilities Reporting to DEQ

No later than October 1st each year, for the previous reporting period from July 1st to June 30th, JSRCC will electronically report BMPs implemented and inspected, as applicable, using the DEQ BMP Warehouse as follows:

- ✓ JSRCC shall use the associated reporting template for stormwater management facilities not reported in accordance with Part III B 5 (of the MS4 General Permit), 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.
- ✓ JSRCC will report BMPs that were not otherwise reported in and were implemented as part of a TMDL action plan to achieve nitrogen, phosphorus, and total suspended solids reductions in accordance with a local TMDL Action Plan or Chesapeake Bay TMDL Action Plan.
- ✓ JSRCC will report the most recent inspection date for BMPs.

Necessary SOPs or Policies for BMP 5C

This Program Plan serves as the written guidance, or policy, for implementation of this BMP. No SOPs are necessary.

Measurable Goal for BMP 5C Evaluation

The effectiveness of this BMP will be measured by the completeness of reporting using the DEQ BMP Warehouse, as will be confirmed with annual reporting (see below).

Annual Reporting for BMP 5C

Annual reporting will include:

- ✓ A confirmation statement that JSRCC conducted electronic reporting as described in the description for this BMP and as required by the MS4 General Permit. If information was not submitted, an explanation as to why with a schedule for submission of the required information.

MCM 6: Pollution Prevention & Good Housekeeping for Facilities

In accordance with the General Permit to address MCM 6, JSRCC will implement the following BMPs:

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

JSRCC will continue to implement the good housekeeping/pollution prevention written procedures for implementation for staff and contractors at JSRCC facilities, as described in the *JSRCC Staff Handbook of Good Housekeeping and Pollution Prevention* (Staff Handbook). The Staff Handbook is available at the JSRCC stormwater webpage.

The procedures in the existing Staff Handbook, incorporated to this program plan by reference, are designed to meet the following objectives:

- ✓ Prevent illicit discharges;
- ✓ Ensure staff and contractors properly dispose of waste materials, including landscape wastes and prevent waste materials from entering the MS4;
- ✓ Prevent the discharge of wastewater wash water into the MS4;

Written good housekeeping procedures are provided for various activities applicable to JSRCC in the Staff Handbook, including, but not limited to, the following:

- ✓ Road, street, sidewalk, and parking lot maintenance and cleaning
  - Note: The Staff Handbook with be updated prior to November 1, 2026, to include best practice written procedures to be implemented for anti-icing and deicing agent application, transport, and storage. Procedures will prohibit the application of any anti-icing and deicing agent containing urea or other forms of nitrogen and phosphorus.
- ✓ Discharging water pumped from construction and maintenance activities;
- ✓ Temporary storage of landscaping materials;
- ✓ Maintenance of JSRCC owned or operated vehicles and equipment to prevent pollutant discharges from leaking vehicles and equipment);
- ✓ Application of fertilizer in accordance with nutrient management plans (applicable to all regulated JSRCC areas); and
- ✓ Application of pesticides and herbicides.

Necessary SOPs or Policies for BMP 6A

The written procedures described within the latest version of the Staff Handbook define the necessary SOPs and policies for implementation of this BMP.

Measurable Goal for BMP 6A Evaluation

The objective of the good housekeeping/pollution prevention written procedures is to minimize or prevent pollutant discharges originating from campus operations and maintenance activities. The effectiveness of this BMP will be measured by an assessment of the number of illicit discharges annually observed or reported that originate from campus operations and maintenance activities. In the case of an occurrence, the related sections of the Staff Handbook will be reviewed in context to the occurrence(s) for potential modifications to prevent future occurrences.

Annual Reporting for BMP 6A

The following will be reported in association with this BMP:

- ✓ A reference and link to the Staff Handbook;
- ✓ A description of any illicit discharges originating from campus operations and maintenance activities; and
- ✓ A summary of any modifications to operational procedures in the Staff Handbook to prevent future occurrences of illicit discharge(s), if applicable.

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

The General Permit requires JSRCC to maintain and implement a stormwater pollution prevention plan (SWPPP) for high priority facilities where specific pollutant generating activities are expected to be exposed to stormwater runoff to the MS4. High priority facilities are defined as facilities draining to the MS4 that actively engage in one of more of the following:

- Composting;
- Equipment storage, cleaning, and maintenance;
- Long-term bulk materials storage;
- Pesticide, herbicide, and fertilizer storage;
- Recycling;
- Anti-icing and deicing agent storage, handling, and transfer;
- Solid waste handling and transfer, and
- Permittee owned or operated vehicle washing, maintenance, and salvage.

The MS4 General Permit requires a SWPPP for high priority facilities for which any of the following specific activities occur and are expected to have exposure to stormwater, resulting from rain, snow, snowmelt or runoff:

- ✓ Areas where residuals from using, storing or cleaning machinery or equipment remain and are exposed to stormwater;
- ✓ Materials or residuals on the ground or in stormwater inlets from spills or leaks;
- ✓ Material handling equipment;
- ✓ 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);
- ✓ Materials or products stored outdoors (except final products intended for outside use where exposure to stormwater does not result in the discharge of pollutants);
- ✓ 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;
- ✓ Waste material except waste in covered, non-leaking containers (e.g., dumpsters);
- ✓ Application or disposal of process wastewater (unless otherwise permitted); 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.

JSRCC does not operate a high priority facility as defined above. The activities listed for the definition of a high priority facility that may be conducted by JSRCC are conducted undercover/indoors and pollutants are not exposed to stormwater (i.e. potential pollutants stored indoors). The *JSRCC Staff Handbook of Good Housekeeping and Pollution Prevention* (Staff Handbook) provides best practices to

prevent pollutant sources from each of the specific, and applicable, activities listed from the permit, above. Therefore, site specific SWPPP(s) continue to not be required for JSRCC. However, JSRCC will annually assess the criteria described above to determine if a SWPPP may become required due to changes on the campus.

Necessary SOPs or Policies for BMP 6B

The written procedures described within the latest version of the Staff Handbook define the necessary SOPs and policies for implementation of this BMP. The college also utilizes an annual SWPPP assessment form to determine if changes on campus would trigger the requirement for a SWPPP.

Measurable Goal for BMP 6B Evaluation

Completion of an annual assessment to determine if activities or storage of materials on the JSRCC campus triggers the requirement for a SWPPP.

Annual Reporting for BMP 6B

JSRCC will report the results of the annual campus assessment to determine if a SWPPP is required. A confirmation statement will be provided regarding findings for SWPPP requirements applicable to JSRCC.

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

JSRCC lands are regulated under § 10.1-104.4 of the Code of Virginia that requires implementation of nutrient management plans (NMPs). JSRCC will continue to maintain compliance with this statutory requirement. NMPs will be developed by a certified turf and landscape nutrient management planner in accordance with § 10.1-104.2 of the Code of Virginia. At a minimum, NMPs will be applicable to all contiguous areas ≥ 1-acre where nutrients are applied. JSRCC's NMP is incorporated, by reference, into this Program Plan.

The current JSRCC NMPs are made available on the JSRCC stormwater webpage and incorporate the following items required for inclusion of this Program Plan:

- ✓ The total acreage covered by the nutrient management plans are as follows:
  - Parham Road Campus location: 4.20 acres
  - Parham Road Athletic Fields location: 2.23 acres
- ✓ The date of the latest Department of Conservation and Recreation (DCR) nutrient management plan approval and expiration dates are 10/6/21 (approval) and 10/6/24 (expiration).

In an effort to mitigate nutrient loadings to the MS4, JSRCC will also continue a policy of not applying deicing agents containing urea or other forms of nitrogen or phosphorus to campus parking lots, roadways, sidewalks, or other paved surfaces.

Necessary SOPs or Policies for BMP 6C

DCR-approved NMP.

Measurable Goal for BMP 6C Evaluation

The objective of the NMPs is to ensure appropriate application of nutrients to minimize nutrient loadings to the MS4s. Effectiveness will be based on the continued implementation of the plans and maintaining current DCR approved versions of the plans.

Annual Reporting for BMP 6C

Annual reporting for this BMP will include:

- ✓ Status of each NMP as of June 30th of the reporting year, including date of the latest DCR approval and expiration dates.

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

JSRCC will require contractors employed by the college that are to engage in activities with the potential to discharge pollutants to the MS4 use appropriate control measures to minimize the discharge of pollutants. JSRCC will implement this BMP with the use of contract language as the mechanism to ensure contractors implement necessary good housekeeping and pollution prevention controls. Implementation of this BMP will include the following during the course of procuring a contract:

- ✓ Determination if the activity has potential to result in discharge of pollutants to the MS4; and
- ✓ Identification of appropriate controls to minimize potential pollutant discharges, if applicable.

In the case that the activity is deemed to have potential to result in discharge of pollutants to the MS4, language will be incorporated into the contract with the contractor that requires the use of the appropriate controls identified during the procurement process, or others deemed necessary by the college if the identified controls are ineffective during the course of the activity. At a minimum, the contractor will be required to implement procedures and controls described in the *JSRCC Staff Handbook of Good Housekeeping and Pollution Prevention* (Staff Handbook), described in BMP 6A.

For contractors applying pesticides or herbicides, JSRCC will ensure contract language requires applicators be certified in accordance with the Virginia Pesticide Control Act (§ 3.2-3900 et seq. of the Code of Virginia).

Necessary SOPs or Policies for BMP 6D

The necessary policies for implementation of this BMP are this Program Plan and the Staff Handbook. Necessary SOPs will be defined in specific contract language for any individual activities procured that have potential to result in discharge of pollutants to the MS4.

Measurable Goal for BMP 6D Evaluation

The objective of the BMP is to minimize or prevent pollutant discharges originating from contractor activities. The effectiveness of this BMP will be measured by an annual assessment of the number of illicit discharges observed or reported that originate from contractor activities.

Annual Reporting for BMP 6D

Annual reporting for this BMP will include:

- ✓ The number of illicit discharges originating from contractor activities.
- ✓ Summary of assessment to modify procurement procedures to prevent future instances.

BMP 6E – Training Plan for Applicable Employees

JSRCC will continue implementing the college's Good Housekeeping/Pollution Prevention Training Plan that is incorporated into the *JSRCC Staff Handbook of Good Housekeeping and Pollution Prevention* (Staff Handbook) and incorporated into this program plan, by reference. Training will occur, at a minimum, once per 24 months and include and focus on best practices and procedures for prevention, recognition and elimination of illicit discharges;

Training will be in the form of a designated meeting session that will incorporate a PowerPoint and the Staff Handbook. The following JSRCC staff will be required to participate in training events:

- ✓ Staff that perform activities outdoors, specifically grounds staff;
- ✓ Staff performing road, street and parking lot maintenance;
- ✓ Staff working in and around facility maintenance or recreational facilities;
- ✓ Staff working in or around a high priority facility, as applicable; and
- ✓ Personnel that may be involved with emergency spill control and response.

For any employees applying pesticides or herbicides, JSRCC will ensure the applicator(s) be certified in accordance with the Virginia Pesticide Control Act (§ 3.2-3900 et seq. of the Code of Virginia).

Training documentation will be maintained for a minimum of three years after the training activity and consist of the date of the training, training presentation, sign-in sheet to track attendees and results from a post-training quiz used as a measure of effectiveness.

Necessary SOPs or Policies for BMP 6E

The necessary policies for implementation of this BMP are this Program Plan and the Staff Handbook.

Measurable Goal for BMP 6E Evaluation

The objective of the BMP is to educate applicable JSRCC staff in prevention, recognition, reporting, and elimination of illicit discharges with use of good housekeeping/pollution prevention practices to prevent nonstormwater discharges from activities performed on JSRCC campus. To measure the effectiveness of the JSRCC training, a quiz will be provided at the end of each training session to assess the information retained by the trainees. The BMP will be considered effective when average scores exceed 80%. If average scores are less than 80%, modification to the training plan will be considered for subsequent training events.

Annual Reporting for BMP 6E

This BMP will include the following annual reporting items:

- ✓ The date of the most recent training event;
- ✓ The date of the prior training event (to ensure within 24 months);
- ✓ The number of attendees for 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.

Special Conditions for Total Maximum Daily Load Waste Load Allocations

General Permit Special Conditions are applicable to JSRCC for the following TMDLs for which a WLA has been assigned: (1) Chesapeake Bay TMDL with WLAs for total phosphorus (TP) and total nitrogen (TN) specified in the General Permit; and the (2) E. coli TMDL Development for Chickahominy River and Tributaries. No other TMDL WLAs have been assigned to JSRCC as of the date of this program plan. To address TMDL Special Conditions, JSRCC will implement the following BMPs:

BMP SC1 – JSRCC Chesapeake Bay Third Phase TMDL Action Plans

JSRCC will submit to DEQ, no later than November 1, 2024, a third phase Chesapeake Bay TMDL Action Plan (CB Action Plan) consistent with the requirements of the General Permit. This Action Plan will supersede previously developed CB Action Plans. Prior to submission, JSRCC will provide opportunity for public comment on the Action Plan for a minimum of 15 days.

Necessary SOPs or Policies for BMP SC1

The necessary policies for implementation of this BMP are this Program Plan BMP and the latest version of the JSRCC Chesapeake Bay TMDL Action Plan, incorporated to this program plan by reference and available on the JSRCC stormwater webpage. The MS4 General Permit is necessary with specific requirements for inclusion into the CB Action Plan.

Measurable Goal for BMP SC1 Evaluation

The computations that will be provided in the CB Action Plan will provide quantitative measures in terms of the required TP an TN reductions. The measurable goal will be the progress in achieving reductions towards the required reductions by the end of the permit cycle in accordance with the CB Action Plan and general permit requirements.

Annual Reporting for BMP SC1

The following will be reported for this BMP, as applicable:

- ✓ The Chesapeake Bay TMDL implementation annual status report in a method and format as specified by DEQ no later than October 1 of each year. The report shall cover the previous year from July 1 to June 30 and include information required for reporting by the general permit.
- ✓ Summary of any public comments on the Chesapeake Bay TMDL action plan received and how the permittee responded (only for year 2 of permit cycle).
- ✓ BMPs implemented during the reporting period and progress towards achieving reductions;
- ✓ A list of BMPs to be implemented the following reporting year; and
- ✓ Any revisions made to the Action Plan during the reporting year.

BMP SC2 – JSRCC Bacteria TMDL Action Plan for Chickahominy River & Tributaries

JSRCC developed the JSRCC Bacteria TMDL Action Plan to address the Total Maximum Daily Loads of E. coli TMDL Development for Chickahominy River and Tributaries, dated August 2012 and approved by the EPA on September 19, 2012. The Plan characterizes the bacteria loadings from the campus, the WLA and potential bacteria sources that could originate on campus. The Plan also describes the practices in place to ensure the bacteria WLA is addressed, specifically with:

- Continued implementation of the existing MS4 Program Plan;
- Modifications to the MS4 Program's supporting documents, as applicable, to incorporate bacteria as a local TMDL pollutant of concern (complete); and
- Maintaining per waste stations on campus.

The Plan is part of this MS4 Program Plan, by reference, and implementation will be annually reported as part of the MS4 annual reporting. The plan will be updated in accordance with the MS4 General Permit no later than May 1, 2025, to incorporate an evaluation of results achieved by the action plan and any adaptive management strategies incorporated into any updates to the plan.

Necessary SOPs or Policies for BMP SC2

The necessary policies for implementation of this BMP are this Program Plan BMP and the JSRCC Chickahominy River and Tributaries Bacteria TMDL Action Plan, incorporated to this Program Plan by reference, and available on the JSRCC stormwater webpage.

Measurable Goal for BMP SC2 Evaluation

The measurable goals are associated with implementing the following requirements of the Action Plan:

- ✓ Continued implementation of MS4 Program BMPs with the potential to minimize bacteria loadings;
- ✓ Maintaining pet waste stations on campus; and
- ✓ Modifications to applicable supporting program documents to incorporate bacteria as a local TMDL pollutant of concern.

Annual Reporting for BMP SC2

JSRCC will annually report on the status of implementation of the Action Plan, including:

- ✓ Implementation of existing MS4 Program BMPs during the reporting period with the potential to minimize bacteria loadings;
- ✓ Total number and percentage of pet waste stations maintained on campus during the reporting period.

Appendix A – Most Recent Standards and Specifications DEQ Approval Letter

Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

1111 E. Main Street, Suite 1400, Richmond, Virginia 23219
P.O. Box 1105, Richmond, Virginia 23218
(800) 592-5482 FAX (804) 698-4178
www.deq.virginia.gov

Matthew J. Strickler
Secretary of Natural and Historic Resources

David K. Paylor
Director
(804) 698-4000

August 20, 2021

Mr. Robert Jones, RA, CBO, VCCO
Associate Vice Chancellor for Facilities Management Services
Arboretum III -300 Arboretum Place, 2nd Floor, Suite 200
Richmond, Virginia 23236

Transmitted electronically: bjones@vccs.edu

Subject: Virginia Community College System – Annual Standards and Specifications for Erosion & Sediment Control and Stormwater Management (AS&S for ESC and SWM)

Dear Mr. Jones:

The Virginia Department of Environmental Quality ("DEQ") hereby approves the Annual Standards and Specifications for Erosion & Sediment Control and Stormwater Management for Virginia Community College System (VCCS) dated 3/12/2021. This coverage is effective from August 20, 2021 through August 19, 2022.

To ensure compliance with approved specifications, the Virginia Erosion and Sediment Control Law and the Virginia Stormwater Management Act, DEQ staff will conduct random site inspections, respond to complaints, and provide on-site technical assistance with specific erosion and sediment control and stormwater management measures and plan implementation.

Please note that your approved Annual Standards and Specifications include the following requirements:

1. Variance, exception, and deviation requests must be submitted separately from this Annual Standards and Specifications submission to DEQ. DEQ may require project-specific plans associated with requests to be submitted for review and approval.

2. The following information must be submitted to DEQ for each project at least two weeks in advance of the commencement of regulated land-disturbing activities. Notifications shall be sent by email to: StandardsandSpecs@deq.virginia.gov
   - i: Project name or project number;
   - ii: Project location (including nearest intersection, latitude and longitude, access point);
   - iii: On-site project manager name and contact info;

iv: Responsible Land Disturber (RLD) name and contact info;
v: Project description;
vi: Acreage of disturbance for project;
vii: Project start and finish date; and
viii: Any variances/exceptions/waivers associated with this project.

3. Project tracking of all regulated land disturbing activities (LDA) must be submitted to the DEQ on a bi-annual basis. Project tracking records shall contain the same information as required in the two week e-notifications for each regulated LDA.

4. Erosion & Sediment Control and Stormwater Management plans must be reviewed by DEQ-Certified Plan Reviewers. VCCS as the AS&S holder, retains the authority to approve plans and must do so in writing. Should an AS&S holder contract out to a third party to fulfill the Plan Reviewer certification, this certified Plan Reviewer may recommend approval of the plan but final approval must come from the AS&S holder.

To ensure an efficient information exchange and response to inquiries, the DEQ Central Office is your primary point of contact. Central Office staff will coordinate with our Regional Office staff as appropriate.

Please contact Nathan Crowther at 804-698-4585 or nathaniel.crowther@deq.virginia.gov if you have any questions about this letter.

Thank you very much for your submission and continued efforts to conserve and protect Virginia's precious natural resources.

Sincerely,

Erin Ervin Belt

Erin Ervin Belt, Manager
Office of Stormwater Management

Case Decision Information:
As provided by Rule 2A:2 of the Supreme Court of Virginia, you have thirty days from the date of service (the date you actually received this decision or the date it was mailed to you, whichever occurred first) 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, Department of Environmental Quality. In the event that this decision is served on you by mail, three days are added to that period.