



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

**Charlottesville Campus**

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

Date: October 1, 2022

General Permit No. VAR040108

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: Dr. Ellen Davenport

Signature: *Ellen R Davenport*

Title: Interim Vice President for Finance & Administrative Services

Date: 9/30/22

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## Background and Purpose

Piedmont Virginia Community College (PVCC) 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. PVCC is authorized to discharge stormwater runoff from the Charlottesville campus MS4 under the Virginia Stormwater Management Program regulations, Virginia Pollutant Discharge Elimination System Regulations (VPDES), and the Virginia State Water Control Law.

PVCC 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, PVCC 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 PVCC 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.**

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

## Compliance Summary

Reported information is consistent with the specific annual reporting required in the General Permit and the PVCC 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 PVCC 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). PVCC 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 Standards & 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 Standards & 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	Rivanna River Sediment TMDL Action Plan	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No
SC3	Moore's Creek Sediment TMDL Action Plan	<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.

<sup>2</sup> Refer to the "Summary of BMP Effectiveness" section for any applicable BMPs identified as not effective.

## Minimum Control Measure Annual Reporting

Reporting provided for each BMP described in the PVCC MS4 Program Plan to address each MCM is provided below. Information provided is only that explicitly required by the General Permit and the PVCC 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 (brochures)</i>
<i>2. Illicit discharge prohibition/enforcement on the PVCC campus disciplinary implications, hazards and proper waste disposal.</i>	<i>Speaking engagements</i>
<i>3. Increase applicable staff's knowledge regarding pollutants of concern for local TMDLs and the Chesapeake Bay TMDL.</i>	<i>Traditional Written Materials (brochures)</i>

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

Results from Public Survey	
<i>Latest survey was distributed on 9/14/2020. Baseline survey results found 62% were not aware of the Stormwater Program, 90% unaware of the SWM webpage, and only 45% were aware stormwater flows directly to surface waters. The next survey will be in spring 2023 and will look for improvements to these results as a measure of effectiveness prior to the end of the permit cycle.</i>	
Date Distributed: 9/14/2020	Number of Respondents: 108

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 PVCC 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.**

<b>Dedicated Stormwater Webpage Reporting</b>	
Link to current MS4 Program and Stormwater pollution prevention webpage: <a href="https://www.pvcc.edu/pvcc-stormwater-program-overview">https://www.pvcc.edu/pvcc-stormwater-program-overview</a>	
An annual review of the website conducted to ensure all information required to be posted on the website was performed?	Yes
Description of updates implemented during the reporting year: <i>PVCC added the 2020-2021 MS4 annual report, as required during the reporting year.</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 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 PVCC 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</b>	<b>Report on the Metric to measure benefit to water quality</b>	<b>Beneficial to Improving water quality?</b>
<i>Disposal or collection events</i>	<i>Recycling Program</i>	<i>Number of recycling bins maintained: 16 in Main Bldg., 2 in Stultz Center, and 6 in Keats Bldg.</i>	<i>Yes</i>
<i>Educational Events</i>	<i>Participation in Sustainability Committee</i>	<i>Monthly meetings. Topics include SWM. Resulted in sustainability webpage 2021 year-end report, &amp;, educational email to all students.</i>	<i>Yes</i>
<i>Pollution prevention</i>	<i>Storm Drain Program</i>	<i>Implemented a storm drain marking program. 20 pieces of storm drain markers were installed at inlets throughout campus.</i>	<i>Yes</i>
<i>Educational Events</i>	<i>PVCC Earth Day event (4/22/22)</i>	<i>Interaction with 25-30 students with stormwater brochures distributed. Table set up at the Bollick Center.</i>	<i>Yes</i>

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

<b>Summary of BMP Effectiveness based on Program Plan Measurable Goal</b>	
Does the measure of BMP effectiveness require Program Plan modification?	<i>No</i>

### 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>
<i>“In accordance with the General Permit and the PVCC Program Plan, PVCC 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>	<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 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 PVCC 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 PVCC Public)		
No. <input type="text" value="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 *PVCC 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 *PVCC 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.	8
Total number of PVCC outfalls.	8
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 listed in Appendix A closed?	<i>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 PVCC Program Plan, PVCC 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>N/A - No projects during the reporting year. Land disturbance for the Advanced Technical Training Center project started near July 1, 2022, with the first inspection after July 1, 2022. Inspections for this project will be reported on in the next annual report.</i>	
Were any enforcement actions taken during the reporting year?	<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 4B –Controls to Prevent Non-stormwater Discharges during Land Disturbance**

Annual reporting associated with this BMP requires:

- ✓ The total number of illicit discharge originating from land disturbance activity of the total illicit discharges reports listed in Appendix A; 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 PVCC 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 PVCC Program Plan, PVCC 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 PVCC’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:	4
Was at least one inspection performed on each PVCC SWM facility during the reporting year?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If no, explain: <i>The employee with the college qualified to perform inspections is no longer employed with the college. However, once this was realized, inspections were completed by H2R Engineering, Inc. on 9/30/22. H2R will be performing the inspections during the current reporting period unless the college obtains another qualified inspector.</i>	
Were any significant maintenance, repair, or retrofit activities necessary to ensure the BMP performs as designed as a result of inspection?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If Yes, provide the BMP ID and a description of the maintenance including an assessment of the timeliness of the needed actions: <i>Findings:</i> <ul style="list-style-type: none"> <li>• <i>BMP #1: Two groundhog holes observed in northwest cell of facility need to be filled and burrowing animals humanely removed from the area.</i></li> <li>• <i>BMP #2: Bush hogging is needed to address high and dense vegetation, especially within a radius of about 80’ of the riser structure to ensure positive drainage to prevent ponding and allow for ease of regular inspection of the control structure outlet to ensure low-flow orifice not clogged.</i></li> <li>• <i>BMPs #3 and #4: Overgrown, but no impediment to functionality apparent (these BMPs appear to be sediment traps that remained after construction of the V. Earl Dickinson Building.</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) PVCC 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) PVCC 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 PVCC 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 (Applicable for Reporting Year)</b>	
<p>Confirmation Statement: <i>“PVCC 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>“PVCC 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</p> <p style="text-align: center;"><input checked="" type="checkbox"/></p>

<b>Certification Statement: Reporting to the DEQ BMP Warehouse</b>	
<p>Confirmation Statement: <i>“PVCC 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</p> <p><input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> N/A</p>

<b>Certification Statement: Report to Virginia Construction Stormwater General Permit Database (Not Applicable for Reporting Year)</b>	
<p>Confirmation Statement: <i>“PVCC 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</p> <p style="text-align: center;"><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 PVCC 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 *PVCC Staff Handbook of 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

<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?	<i>No</i>

**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 PVCC apply nutrients during the reporting year?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did PVCC apply deicing agents 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 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 *PVCC Staff Handbook of Good Housekeeping and Pollution Prevention P* 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>June 28<sup>th</sup> - 30<sup>th</sup>, 2022. Training was provided as training video specifically developed for PVCC and online quiz (measure of effectiveness and documentation).</i>
Date of previous training:	<i>August 22, 2020</i>
Has training continued to be provided a minimum of once every 24 months?	<i>Approximately</i>
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>
Does the percentage of those identified to be required to attend training attend?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Description of the objective of the 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 87% previous training indicates training effective)</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;
- ✓ 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 7.69 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 PVCC, 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 (<math>\geq 2</math> days since rain):</i></p>			
Days Since Rain	TP (lbs/ton) <sup>1</sup>	TN (lbs/ton) <sup>1</sup>	TSS ( $\leq 841 \mu\text{m}$ ) (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	14.0	6.72	
TP	2.83	1.63	
TSS	1,207	10,057	
Are reductions progressing to achieve targets?		No	
<p><i>Sweeping has not consistently provided the required reductions. In response, a CB TMDL Action Plan Reassessment report has identified conversion of 2.6 acres of turf to forest and/or 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 – Reassessment available upon request	

**BMP SC2 – Rivanna River Sediment 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>Rivanna River Sediment TMDL Action Plan Annual Reporting</b>		
<p><i>Street sweeping was implemented in accordance with the Phase II Action Plan. A total of 7.69 tons of sweepings were collected for the reporting period. Equivalent TSS reductions are partially based on results of sampling of swept material by MS4s statewide, including PVCC, 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 (<math>\geq 2</math> days since rain):</i></p>		
Days Since Rain	TP (lbs/ton) <sup>1</sup>	TN (lbs/ton) <sup>1</sup>
$\leq 2$	0.044	1.188
$> 2$	0.324	1.336
<p style="text-align: right;">TSS (<math>\leq 841 \mu\text{m}</math>) (lbs/ton)<sup>2</sup></p> <p style="text-align: center;">794 (39.7%) 1,308 (65.4%)</p>		
<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 (lbs/yr)	Reductions achieved this year (lbs.)
Sediment (TSS)	6,205	10,057
Are reductions progressing to achieve targets?		Yes
<p><i>Sweeping was performed on 5/2/22 and 6/6/22, collecting 5.69 tons and 2 tons, respectively. Please refer to response to BMP SC1 that describes alternative BMPs for the upcoming reporting period to address all TMDL pollutant reductions since sweeping has not consistently provided the required reductions for all TMDL WLAs. Alternatives were also identified since the pollutant quantification method in DEQ Guidance conflicts with the current and past methods used by PVCC based on sampling of swept materials.</i></p>		
Were any modifications made to the action plan?	See reporting for this section for BMP SC1	

**BMP SC3 – Moores Creek Sediment 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>Moores Creek Sediment TMDL Action Plan Annual Reporting</b>			
<p><i>Street sweeping was implemented in accordance with the Phase II Action Plan. A total of 7.69 tons of sweepings were collected for the reporting period. Equivalent TSS reductions are partially based on results of sampling of swept material by MS4s statewide, including PVCC, 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 (<math>\geq 2</math> days since rain):</i></p>			
Days Since Rain	TP (lbs/ton) <sup>1</sup>	TN (lbs/ton) <sup>1</sup>	TSS ( $\leq 841 \mu\text{m}$ ) (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 (lbs/yr)		Reductions achieved this year (lbs.)
TSS	5,040		10,057
Are reductions on target to achieve targets			Yes
<p><i>Sweeping was performed on 5/2/22 and 6/6/22, collecting 5.69 tons and 2 tons, respectively. Please refer to response to BMP SC1 that describes alternative BMPs for the upcoming reporting period to address all TMDL pollutant reductions since sweeping has not consistently provided the required reductions for all TMDL WLAs. Alternatives were also identified since the pollutant quantification method in DEQ Guidance conflicts with the current and past methods used by PVCC based on sampling of swept materials.</i></p>			
Were any revisions made to the action plan?		<i>See reporting for this section for BMP SC1</i>	