



Municipal Separate Storm Sewer System Annual Report

Reporting Period: July 1, 2020 to June 30, 2021

Date: October 1, 2021

General Permit No. VAR040138

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

(Page Intentionally Left Blank)

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: Christine Fields

Signature: Christine Fields

Title: VP of Finance

Date: 9/30/2021

TABLE OF CONTENTS

Background and Purpose	1
Compliance Summary	2
Minimum Control Measure Annual Reporting	3
MCM 1: Public Education and Outreach	3
<i>BMP 1A – Public Education & Outreach Plan</i>	3
MCM 2: Public Involvement and Participation	4
<i>BMP 2A – Dedicated MS4 Webpage</i>	4
<i>BMP 2B – Procedures for Receipt/ Response to Public Reports/Input</i>	5
<i>BMP 2C – Public Involvement/Participation Activities</i>	6
MCM 3: Illicit Discharge Detection and Elimination	6
<i>BMP 3A – Maintain MS4 Map and Information Table</i>	7
<i>BMP 3B – Prohibition of Unauthorized Nonstormwater Discharges</i>	8
<i>BMP 3C – Maintain, Implement, Enforce IDDE Written Procedures (Includes Screening)</i>	9
MCM 4: Construction Site Stormwater Runoff Control	10
<i>BMP 4A – Address Discharge from Regulated Construction Site Stormwater Runoff</i>	10
<i>BMP 4B –Controls to Prevent Nonstormwater Discharges during Land Disturbance</i>	10
MCM 5: Post-construction SWM for Development	12
<i>BMP 5A – Address Post-construction Stormwater Runoff</i>	12
<i>BMP 5B – Implement Inspection & Maintenance Program for SWM Facilities</i>	12
<i>BMP 5C – Maintain SWM Facilities Spreadsheet</i>	13
<i>BMP 5D –SWM Facilities Reporting to DEQ</i>	14
MCM 6: Pollution Prevention & Good Housekeeping for Facilities	14
<i>BMP 6A –Written Procedures for Pollution Prevention/Good Housekeeping</i>	15
<i>BMP 6B –SWPPPs for High Priority/ High Potential Facilities for Discharging Pollutants</i>	15
<i>BMP 6C – Maintain/ Implement Nutrient Management Plans and Deicing Policy</i>	16
<i>BMP 6D – Contractor Requirements to Utilize Controls to Minimize Pollutant Discharges</i>	17
<i>BMP 6E – Training Plan for Applicable Employees</i>	18

Background and Purpose

Virginia Highlands Community College (VHCC) 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. VHCC is authorized to discharge stormwater runoff from the Abingdon campus’s MS4 under the Virginia Stormwater Management Program Regulations, Virginia Pollutant Discharge Elimination System Regulations (VPDES), and the Virginia State Water Control Law.

Specifically, VHCC 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, VHCC 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 VHCC to submit an annual report to the Virginia Department of Environmental Quality (DEQ) no later than October 1st of each year that reports on program implementation from July 1st of the previous year to June 30th of the current year. Consistent with the requirements of the General Permit, this annual report includes specific information 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

The following sections include the specific annual reporting required for each of the BMPs described in the VHCC MS4 Program Plan. Reported information includes the specific annual reporting required in the General Permit, along with supplemental information described in the Program Plan, as applicable, to measure effectiveness of each BMP. For use in reference to this annual report, the Program Plan is provided at the VHCC 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).

VHCC has evaluated the effectiveness of each program BMP, as described in the Program Plan and as applicable. Table 2 summarizes the evaluation any modifications to the MS4 Program Plan that VHCC will provide in the subsequent reporting year.

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

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

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

Minimum Control Measure Annual Reporting

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

MCM 1: Public Education and Outreach

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

BMP 1A – Public Education & Outreach Plan

Annual reporting associated with this BMP requires:

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

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

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

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

Results from Public Survey		
<i>Two follow-up surveys: (1) Focused on material for WQ issues # 1 & #2 distributed to all of the VHCC public. (2) Focused on WQ issue #3 distributed to applicable staff. Next survey to assess improvement of scores will be in the spring of 2023. Since the 9/25/2019 survey, the public score remained the same and the staff score decreased slightly from 74% to 71%.</i>		
Date Distributed: <i>9/20/2021</i>	Number of Respondents: <i>(1) 89 and (2) 4</i>	Average Score: <i>(1) 71% and (2) 71%</i>

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

MCM 2: Public Involvement and Participation

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

BMP 2A – Dedicated MS4 Webpage

Annual reporting associated with this BMP requires:

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

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

Dedicated Stormwater Webpage Reporting	
Link to current MS4 Program and Stormwater pollution prevention webpage: https://www.vhcc.edu/about-the-college/stormwater	
An annual review of the website conducted to ensure all information required to be posted on the website has continued to be maintained?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Description of updates implemented during the reporting year: <i>VHCC has added the following to the college’s stormwater webpage: (1) 2019-2020 MS4 Annual Report, as required per the permit to the webpage; and (2) updated VCCS Annual Standards and Specifications for ESC and SWM (approved 2021).</i>	

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

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

Annual reporting associated with this BMP requires:

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

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

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

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

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

BMP 2C – Public Involvement/Participation Activities

Annual reporting associated with this BMP requires:

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

Public Involvement/Participation Activities			
Involvement Type¹	Description of activity	Report on the Metric to measure benefit to water quality	Beneficial to Improving water quality?
<i>Pollution prevention</i>	<i>Installed water cooler and bottle filler to reduce plastic bottle use impact to trash/environment.</i>	<i>One station recently installed. 29,093 water bottles saved.</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>Pollution prevention</i>	<i>Maintenance of dog waste stations</i>	<i>Waste bags maintained for availability.</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>Pollution prevention</i>	<i>Maintain storm inlet markers (no dumping)</i>	<i>100% of accessible inlets marked. Minimum of 20% maintained annually.</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>Disposal or collection events</i>	<i>Campus clean-up day: trash and old vegetation collection.</i>	<i>+/- 15 collectors (limited volunteers due to COVID-19)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

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

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

MCM 3: Illicit Discharge Detection and Elimination

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

BMP 3A – Maintain MS4 Map and Information Table

Annual reporting associated with this BMP requires:

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

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

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

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 VHCC public;
- ✓ An assessment, when applicable, of any disciplinary action in context to the protection of water quality.

Illicit Discharge Prohibition Enforcement		
No. Add Instance	Disciplinary action taken? (Yes / No)	Description of action taken
Total number of instances for current reporting year.		0
Total number of instances for last reporting year.		0
Total number of instances two years previous.		0
Total number of instances three year prior.		0
Does trend indicate the BMP is ineffective?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

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

Annual reporting associated with this BMP requires:

- ✓ The total number of outfalls screened during the reporting period as part of the dry weather screening program; and
- ✓ A list of illicit discharges to the MS4 including spills reaching the MS4. Each instance of illicit discharge will be documented using the “IDDE Tracking Form” in the *VHCC 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 *VHCC Staff Handbook of Good Housekeeping and Pollution Prevention* for cases where a detected illicit discharge was not eliminated. A schedule for completing any modification will also be provided.

Outfall Screening & IDDE Procedure Effectiveness	
Total number of points of interconnection screened as part of dry weather screening program.	<i>11¹</i>
Total number of VHCC points of interconnection.	<i>11</i>
Were 100% of outfalls screened during the reporting year?	<i>N/A</i>

¹ VHCC’s regulated area does not include regulated outfalls. However, as recently requested by Kelly Miller, Stormwater & Watershed Planning Manager with DEQ, points of intersection are now being screened as if they were outfalls.

Effectiveness Assessment for Addressing Illicit Discharges	
Were all instances of identified illicit discharge listed in Appendix A closed?	<i>N/A – No instances</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.

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

ESC Inspections & Enforcement Summary	
Total number of ESC inspections conducted: <i>N/A – no construction activity</i>	
Were any enforcement actions taken during the reporting year?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

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

Annual reporting associated with this BMP requires:

- ✓ The total number of illicit discharge 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.

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

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

MCM 5: Post-construction SWM for Development

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

BMP 5A – Address Post-construction Stormwater Runoff

Annual reporting associated with this BMP requires:

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

Certification Statement: Adherence to the VCCS Standards & Specifications for SWM	
Confirmation Statement: <i>“In accordance with the General Permit and the VHCC Program Plan, VHCC 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 type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A

Certification Statement: Adherence to the VCCS Standards & Specifications for SWM (Not Applicable for Reporting Year)	
Confirmation Statement: <i>“VHCC confirms that land disturbing projects did not occur during the reporting period that would be applicable to the latest DEQ-approved standards and specifications for Stormwater Management.”</i>	Marked box below is confirmation <input checked="" type="checkbox"/>

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

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

SWM Facility Inspections and Maintenance	
Total number of inspections conducted on SWM facilities: 5	
Was at least one inspection performed on each VHCC SWM facility?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were any <u>significant</u> maintenance, repair, or retrofit activities necessary as a result of inspection?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>If Yes, provide the BMP ID and a description of the maintenance including an assessment of the timeliness of the needed actions.</p> <ul style="list-style-type: none"> • <i>BMP #2: (1) Clear blockages/vegetation within 5 feet of the bottom drain/outlet that appears clogged based on standing water observed and aquatic vegetation. (2) Review plans to determine if existing vegetation is intended.</i> • <i>BMP #5: Understood this is to be a dry pond; but wetland plants are present and there is standing water. As a result, the low-flow orifice cannot be accessed and is likely clogged. Review plans and restore the facility to the intended function.</i> 	

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) VHCC 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 or (2) VHCC 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.

Certification Statement: Report to Virginia Construction Stormwater General Permit Database (Applicable for Reporting Year)	
Confirmation Statement: <i>“VHCC submitted SWM facility information through the Virginia Construction Stormwater General Permit database for those land disturbing activities for which coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities was required in accordance with the VCCS Standards and Specifications for ESC and SWM.”</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A

¹ 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.

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

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 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 VHCC 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 *VHCC Staff Handbook of Good Housekeeping and Pollution Prevention* to prevent future occurrences of illicit discharge(s), if applicable.

Effectiveness of Program to Prevent Illicit Discharges from Campus Operations	
Were there any illicit discharges from BMP 3C reporting that originated from campus operations of maintenance activities?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

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

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

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

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

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

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

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

Nutrient Management	
Did VHCC apply nutrients during the reporting year?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did VHCC apply deicing agents during the reporting year?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

BMP 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 *VHCC Staff Handbook of Good Housekeeping and Pollution Prevention* to prevent future instances.

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

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

BMP 6E – Training Plan for Applicable Employees

Annual reporting associated with this BMP requires:

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

Good Housekeeping/Pollution Prevention Training	
Date of latest training event:	<i>September 23, 2021 through September 30, 2021 (Virtual – video & online quiz)</i>
Date of previous training:	<i>September 11, 2019</i>
Has training continued to be provided biannually?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Number of employees that attended the previous training event.	4
Number of employees identified to be required to participate in training (as defined by the general permit and program plan).	4
Percent of those identified that attended training.	100%
Did a significant percentage of those required attend?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Provide a 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, priority areas on campus, and impairments to local waterways. Average quiz scores have increased since the previous training, rising from 74% to 83%.</i>	
Average quiz score from latest training event.	83%

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