



# **Municipal Separate Storm Sewer System Program Plan**

**Abingdon Campus**

General Permit No. VAR040138

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

Latest Revision: March 25, 2019

## TABLE OF CONTENTS

*(Click section heading for hyperlink within document)*

<b>Background and Purpose</b> .....	<b>1</b>
Program Structure.....	2
Annual Reporting.....	3
<b>Schedule</b> .....	<b>4</b>
<b>MCM 1: Public Education and Outreach</b> .....	<b>5</b>
BMP 1A – Public Education & Outreach Plan.....	5
<b>MCM 2: Public Involvement and Participation</b> .....	<b>8</b>
BMP 2A – Dedicated MS4 Webpage.....	8
BMP 2B – Procedures for Receipt/ Response to Public Reports/Input.....	9
BMP 2C – Public Involvement/Participation Activities.....	10
<b>MCM 3: Illicit Discharge Detection and Elimination</b> .....	<b>12</b>
BMP 3A – Maintain MS4 Map and Information Table .....	12
BMP 3B – Prohibition of Unauthorized Nonstormwater Discharges .....	14
BMP 3C – Maintain, Implement, Enforce IDDE Written Procedures .....	14
<b>MCM 4: Construction Site Stormwater Runoff Control</b> .....	<b>17</b>
BMP 4A – Address Discharge from Regulated Construction Site Stormwater Runoff.....	17
BMP 4B –Controls to Prevent Nonstormwater Discharges during Land Disturbance .....	19
<b>MCM 5: Post-construction SWM for Development</b> .....	<b>20</b>
BMP 5A – Address Post-construction Stormwater Runoff.....	20
BMP 5B – Implement Inspection & Maintenance Program for SWM Facilities.....	22
BMP 5C – Maintain SWM Facilities Spreadsheet .....	23
BMP 5D –SWM Facilities Reporting to DEQ .....	24
<b>MCM 6: Pollution Prevention &amp; Good Housekeeping for Facilities</b> .....	<b>24</b>
BMP 6A –Written Procedures for Pollution Prevention/Good Housekeeping .....	25
BMP 6B –SWPPPs for High Priority/ High Potential Facilities for Discharging Pollutants ....	27
BMP 6C – Maintain/ Implement Nutrient Management Plans and Deicing Policy .....	29
BMP 6D – Contractor Requirements to Utilize Controls to Minimize Pollutant Discharges...	30
BMP 6E – Training Plan for Applicable Employees.....	31

## 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.

VHCC 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 VHCC 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.

The guidance document that describes how the college will maintain compliance with the General Permit is the MS4 Program Plan. 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 addressing the permit-specific requirements for the MCMs, an MS4 may also be subject to special condition requirements for total maximum daily load (TMDL) waste load allocations (WLA). Although VHCC lies within the TMDL watershed for the “Bacteria and Benthic TMDL for Wolf Creek,” the college has not been assigned a WLA and therefore TMDL special conditions in the General Permit are not applicable to the college.

Implementation of the VHCC 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 VHCC 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, VHCC is not dependent on another entity to implement portions of the MS4 program and the VHCC Superintendent for Buildings and Grounds is responsible for the implementation of each program BMP described herein. If these responsibilities change throughout the permit cycle, VHCC 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 this VHCC Program Plan, supporting documents are also incorporated by reference and include the:

- Virginia Community College System Annual Standards and Specifications for Erosion and Sediment Control (ESC) and Stormwater Management (SWM), latest DEQ-approved version;
- VHCC Illicit Discharge Detection and Elimination (IDDE) Program Manual, latest revision June 2014;
- VHCC Post-Construction SWM Inspection and Maintenance Program Manual, latest revision June 2014; and the
- VHCC Good Housekeeping/Pollution Prevention Program Manual and Integrated SWPPP, latest revision May 2017.

The latest versions of the supporting documents incorporated into the Program Plan will be maintained on the college's 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 are 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**

VHCC is required by the General Permit to submit an annual report to the Virginia DEQ no later than October 1<sup>st</sup> of each year that reports on program implementation from July 1<sup>st</sup> to June 30<sup>th</sup> 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.

## 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 # <sup>1</sup>	Summary of Description of Critical Item <sup>2</sup>	Timeframe
1A	Initial Public & Staff Surveys	April 2019
1A	Outreach for high-priority issue #1	Spring, annually
1A	Outreach for high-priority issue #2	By June 30, 2019. Maintain thereafter.
1A	Outreach for high-priority issue #3	Fall, annually
1A	Second Public & Staff Surveys	April 2021
1A	Final Public & Staff Surveys	April 2023
2A	Maintain dedicated webpage	Ongoing per BMP description
2B	Receive/respond to public reports/input	Ongoing per BMP description
2C	Public Participation Event #1	Annually
2C	Public Participation Event #2	Annually
2C	Public Participation Event #3	Fall, annually
2C	Public Participation Event #4	Install by June 30, 2019. Maintain after.
3A	Update MS4 Map and Information Table	By June 30, 2019
3A	Maintain MS4 Map and Information Table.	Annually, by June 30
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 during land disturbance activity
4B	Implement VCCS Stnds. & Specs for ESC & SWM	Ongoing during land disturbance activity
5A	Implement VCCS Stnds. & Specs for ESC & SWM	Ongoing during land disturbance activity
5B	Conduct annual SWM Facility Inspections	Annually, by June 30
5C	Update SWM Facility Spreadsheet	Within 30 days of facility coming online
5D	Report to DEQ Construction Stormwater Database	By June 30, 2019
5D	Report to DEQ BMP Warehouse	Annually, by October 1
6A	Implement Good Housekeeping Procedures	Ongoing during daily operations
6B	Conduct annual campus-wide SWPPP Evaluation	Annually, by June 30
6C	Maintain Current Nutrient Management Plan	Prior to application of nutrients
6D	Ensure contract language for controls	For any qualifying contracts per BMP
6E	Conduct MS4 employee training	By June 30, 2019, 2021, 2023

\* Submit Annual Report annually by October 1<sup>st</sup> and post on the webpage by annually by November 1<sup>st</sup> \*

<sup>1</sup>The VHCC Superintendent for Buildings and Grounds is responsible for ensuring implementation of each BMP.

<sup>2</sup>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, VHCC will implement the following BMPs:

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

VHCC 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.**

<b>Strategies<sup>1</sup></b>	<b>Examples (provided as examples and are not meant to be all inclusive or limiting)</b>
Traditional written materials	Informational brochures, newsletters, fact sheets, utility bill inserts, or recreational guides for targeted groups of citizens
Alternative materials	Bumper stickers, refrigerator magnets, t-shirts, or drink koozies
Signage	Temporary or permanent signage in public places or facilities, vehicle signage, bill boards, or storm drain stenciling
Media Materials	Information disseminated through electronic media, radio, televisions, movie theater, or newspaper
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

<sup>1</sup>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	Public Audience <sup>1</sup>	Strategy and Time Period <sup>2</sup>
<p>1. General Public Education on:</p> <ul style="list-style-type: none"> <li>✓ Stormwater Impacts to Surface Waters and</li> <li>✓ Steps to Reduce Pollution</li> </ul>	<p>Selected based on the results of a survey of the VHCC public that found a need for general information regarding stormwater runoff impact to surface waters (i.e. 93% 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.</p>	<p>Students, Faculty, &amp; Staff</p>	<p>Traditional Materials (Spring)</p>
<p>2. Illicit Discharge Prohibition and Enforcement on the VHCC Campus:</p> <ul style="list-style-type: none"> <li>✓ Disciplinary Implications,</li> <li>✓ Hazards, and</li> <li>✓ Proper Waste Disposal</li> </ul>	<p>Selected due to the need to inform of the illicit discharge prohibition and enforcement mechanisms in place for the VHCC 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/enforcement of illicit discharges will minimize the potential for occurrences, thus having a positive impact on water quality.</p>	<p>Students, Faculty, &amp; Staff</p>	<p>Signage (Install Year 1, then annual Inspection &amp; Maintenance)</p>
<p>3. Increase the applicable staff's knowledge regarding Bacteria and Sediment TMDL for Wolf Creek</p>	<p>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 or sediment via discharge of the VHCC MS4 is most applicable to activities conducted by the janitorial and grounds staff component of VHCC'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.</p>	<p>Staff</p>	<p>Traditional Materials (Fall)</p>

<sup>1</sup> For the purposes of the community college, VHCC's overall public is defined as students, faculty, and staff.

<sup>2</sup> 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 VHCC public education and outreach program.

### **Measurable Goals for BMP 1A Evaluation**

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

- ✓ A survey incorporating questions related to: (1) stormwater impacts to surface water quality and (2) 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 VHCC 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 bacteria and sediment impacts to Wolf Creek to gauge progress for the high priority water quality issue #3. This survey will be distributed to the VHCC 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 modifying to the VHCC public education and outreach program. If modifications are necessary, changes will be made to this BMP and an updated Program Plan provided on the VHCC stormwater website within 30 days of the modification.

### **Annual Reporting for BMP 1A**

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

- ✓ A list of the high-priority stormwater issues VHCC addressed during the reporting year. If an issue varies from those listed in Table BMP-1A-2, an updated Program Plan will be included on the VHCC stormwater webpage within 30 days of the change.
- ✓ A list of the strategies from Table BMP-1A-1 used to communicate each high-priority stormwater issue.
- ✓ The public survey results described for use as a measure of effectiveness. Any program plan modification as a result of the effectiveness measure will also be reported.

## **MCM 2: Public Involvement and Participation**

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

### **BMP 2A – Dedicated MS4 Webpage**

VHCC will maintain a webpage dedicated to the VHCC MS4 Program and stormwater pollution prevention at the following webpage address: <http://www.vhcc.edu/about-vhcc/stormwater>

As required by the permit, the webpage will provide the following information:

- ✓ 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 input on the VHCC MS4 Program Plan.
- ✓ The MS4 General Permit and the DEQ MS4 General Permit coverage letter provided to VHCC.
- ✓ 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 1<sup>st</sup>.

### **Necessary SOPs or Policy for BMP 2A**

This Program Plan serve as the written guidance, or policy, for implementation of this BMP. No 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 VHCC 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 to be posted is maintained and up to date.

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

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

- ✓ VHCC staff receiving email or hotline calls regarding: (1) potential illicit discharges, (2) complaints regarding land disturbance, or (3) other stormwater pollution concerns, will maintain documentation of each report electronically for annual reporting. Documentation will include the following information for each report:
  - (1) The source of illicit discharge;
  - (2) The dates that the discharge was observed, reported, or both;
  - (3) Whether the discharge was discovered by the permittee during dry weather screening, reported by the public, or other method (describe);
  - (4) How the investigation was resolved;
  - (5) A description of any follow-up activities; and
  - (6) The date the investigation was closed.
- ✓ VHCC staff receiving email or hotline calls regarding input or complaint on the MS4 Program Plan will maintain documentation of each report electronically for annual reporting. Documentation will include:
  - (1) The reported input or complaint, 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 Program Plan serve as the written guidance, or policy, for implementation of this BMP. No SOPs are necessary. 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**

A summary of:

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

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

VHCC has identified four public involvement activities to be implemented, 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.

For public involvement activities of the four activities, at least two of the “opportunity types” from the first column of **Table BMP-2C-1** below will be implemented each year, as required by the General Permit (i.e. all 4 events cannot be an “educational event”). The description of each activity, anticipated time period each will occur, and a metric to measure water quality benefit is also provided in the table.

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

Opportunity Types <sup>1</sup>	Description of Activity <sup>2</sup>	Anticipated time period <sup>2</sup>	Metric to Measure Benefit to Water Quality
1. Educational event	Participation on environmental advisory committees	TBD based on meetings	Measure will be in regards to committee type and relationship to water quality.
2. Educational event	Booth at community fair	TBD based on event schedule	Number of water quality improvement brochures handed out and/or sign in sheets will be used to gauge the number of participants attending the booth. Benefit will be gaged based on fraction of event attendees visiting the booth.
3. Disposal or collection event	Household hazardous chemicals collection	Collection  station for Fall Semester	Measure (weight or other appropriate measure) of collected material that otherwise could have potentially impacted water quality.
4. Pollution prevention	Implement a storm drain marking program.	Markings provided in Year 1 of the permit with annual maintenance in spring	Measure of the fraction of VHCC MS4 storm inlets provided markings and annually maintained, as necessary. Markings are inherently anticipated to improve water quality, acting a signage to prohibit introducing illicit discharges to the MS4.

<sup>1</sup> VHCC may coordinate with other MS4 permittees, but is responsible for meeting the requirements of the BMP.

<sup>2</sup> 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 VHCC 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 such as the availability of an environmental advisory committee or community fair.

### **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.

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

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

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

VHCC will continue maintaining an accurate MS4 map and information table developed during the previous General Permit cycle and incorporate additional information required by the current General Permit. No changes of the service area have occurred as a result of the 2010 decennial census.

- **VHCC's MS4 map will continue** to include:
  - ✓ MS4 outfalls discharging to surface waters (add new outfalls annually by October 1<sup>st</sup>);
  - ✓ A unique identifier for each mapped item, to include outfalls and points of discharge; and
  - ✓ The name and location of receiving waters;
- **VHCC's MS4 map will be updated** consistent with the current General Permit to also include:
  - ✓ The MS4 regulated service area
  - ✓ VHCC-owned stormwater management facilities
- **VHCC's MS4 information table will continue** to include the following for each outfall or point of discharge on the MS4 map:
  - ✓ The unique identifier, corresponding with the MS4 map;
  - ✓ The estimated regulated drainage area draining to the outfall or point of discharge; and
  - ✓ The name of the receiving water and its 6<sup>th</sup> Order Hydrologic Unit Code.
- **VHCC's MS4 information table will be updated** consistent with the current General Permit to also include the following for each outfall or point of discharge on the MS4 map:
  - ✓ The latitude and longitude;
  - ✓ An indication as to whether the receiving water is listed as impaired in the Virginia 2016 305(b)/303(d) Water Quality Assessment Integrated Report;
  - ✓ The predominant land use for each outfall discharging to an impaired water; and
  - ✓ The name of any EPA approved TMDLs for which the permittee is assigned a wasteload allocation (review and update annually by October 1<sup>st</sup>).

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

- ✓ MS4 Map and Information Table
- ✓ Copies of written notifications of new physical interconnections. There have been no new interconnections since notifications provided during the previous permit cycle. However, if in the course of annually assessing the MS4 map, any newly discovered interconnections to downstream adjacent MS4s are identified, VHCC will provide additional written notification to the MS4 regarding the interconnection, 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 a regularly 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 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;

### **BMP 3B – Prohibition of Unauthorized Nonstormwater Discharges**

VHCC 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* for students, 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 VHCC 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 VHCC Campus” high priority stormwater issue described in **Table BMP-1A-2** (BMP-1A).

#### **Necessary SOPs or Policies for BMP 3B**

This 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 VHCC 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 VHCC public. Assessment will be based on the effectiveness of the disciplinary action to prevent continued instances of the associated illicit discharge purposefully caused by the VHCC 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 VHCC 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**

VHCC will continue to maintain, implement, and enforce IDDE written procedures designed to detect, identify, and address unauthorized nonstormwater discharges, including illegal dumping, to effectively eliminate the unauthorized discharge. The written procedures are described in VHCC’s existing *IDDE Program Manual* 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 (Section 5, IDDE Program Manual);
  - 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 (Section 6, IDDE Program Manual);
- ✓ Methodologies to determine the source of all illicit discharges (Section 6, IDDE Program Manual);
- ✓ Mechanisms to eliminate identified sources of illicit discharges (Section 7, IDDE Program Manual);
- ✓ Methods for conducting a follow-up investigation in order to verify that the discharge has been eliminated (Section 7, IDDE Program Manual); and
- ✓ A mechanism to track all investigations that include information required by the General Permit (Section 4 and the IDDE Tracking Form in Appendix D, IDDE Program Manual).

The *VHCC IDDE Program Manual* (IDDE procedures) will be maintained on the VHCC MS4 Program webpage, described in BMP 2A, and is incorporated into this Program Plan, by reference.

### **Necessary SOPs or Policies for BMP 3C**

This following policies are necessary for implementation of this BMP:

- ✓ Standards of Conduct for Employees
- ✓ Student Handbook

This following SOPs are necessary for implementation of this BMP:

- ✓ VHCC IDDE Program Manual, 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 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 IDDE Program Manual 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 Control**

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

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

As a public institution of higher education, VHCC 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 VHCC MS4 Program 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 the inspection schedule;
  - 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.

### **Necessary SOPs or Policies for BMP 4A**

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 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  $\geq$  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 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.

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

VHCC 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 of the MS4. The requirement for appropriate controls to prevent nonstormwater discharges during land disturbing activity is implemented by VHCC through implementation of the *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  $\geq$  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, VHCC will implement the following BMPs:

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

As a public institution of higher education, VHCC 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 Regulations (9VAC25-870).

The following will be maintained on the VHCC MS4 Program 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 Regulations;
  - Written inspection 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* define the necessary SOPs and policies for implementation of this BMP.

### **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;
- ✓ A SWM facility record drawing was 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**

VHCC will continue to implement an inspection and maintenance program for the college’s SWM facilities, as described in the *VHCC Post-construction SWM Inspection & Maintenance Program Manual* and will continue to inspect all SWM facilities annually, at a minimum.

The following will be maintained on the VHCC MS4 Program webpage, described in BMP 2A, and is incorporated into this Program Plan, by reference:

- ✓ *VHCC Post-construction SWM Inspection & Maintenance Program Manual* that includes:
  - Written inspection procedures and all associated documents utilized during inspection of SWM facilities;
  - Written maintenance procedures; and
  - Roles and responsibilities in implementing the post-construction stormwater runoff control program.

### **Necessary SOPs or Policies for BMP 5B**

The written procedures described within the latest version of the *VHCC Post-construction SWM Inspection & Maintenance Program Manual* define 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 *VHCC Post-construction SWM Inspection & Maintenance Program Manual*.

### **Annual Reporting for BMP 5B**

Annual reporting will include:

- ✓ 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.

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

VHCC will continue to maintain a SWM facility spreadsheet that includes the following information for each SWM facility:

- ✓ The SWM facility or BMP type;
- ✓ The SWM facility or BMPs location as latitude and longitude;
- ✓ The acres treated by the SWM facility or BMP, including total acres, pervious acres, and impervious acres;
- ✓ The date the facility was brought online (MM/YYYY). If the date brought online is not known, the permittee shall use June 30, 2005;
- ✓ The 6th Order Hydrologic Unit Code in which the SWM facility is located;
- ✓ Whether the SWM facility or BMP is owned or operated by the permittee or privately owned;
- ✓ Whether or not the SWM facility or BMP is part of a TMDL Action Plan;
- ✓ If the SWM facility or BMP is privately owned, whether a maintenance agreement exists; and
- ✓ The date of the most recent inspection.

VHCC will update the SWM facility spreadsheet within 30 days of any new SWM facility coming online. The following will be maintained on the VHCC MS4 Program webpage, described in BMP 2A, and is incorporated into this Program Plan, by reference:

- ✓ The VHCC SWM facility spreadsheet that includes the information described above.

### **Necessary SOPs or Policies for BMP 5C**

The written procedures described within the latest version of the *VHCC Post-construction SWM Inspection & Maintenance Program Manual* define the necessary SOPs and policies for implementation of this BMP.

### **Measurable Goal for BMP 5C Evaluation**

The effectiveness of this BMP will be measured by the continued maintenance and completeness of the spreadsheet.

### **Annual Reporting for BMP 5C**

No annual reporting necessary (see the Annual Reporting section for BMP 5D).

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

VHCC will implement the following reporting, as required by the General Permit:

- ✓ Use the DEQ Construction Stormwater Database or other application as specified by the DEQ to report each SWM facility installed after July 1, 2014, to address the control of post-construction runoff from land disturbing activities for which a General VPDES Permit for Discharges of Stormwater from Construction Activities was required.

### **Necessary SOPs or Policies for BMP 5D**

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

### **Measurable Goal for BMP 5D Evaluation**

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

### **Annual Reporting for BMP 5D**

Annual reporting will include:

- ✓ 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.

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

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

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

VHCC will continue to implement the good housekeeping/pollution prevention written procedures for the college's facilities, as described in the *VHCC Good Housekeeping/Pollution Prevention Program Manual* and *Integrated SWPPP*. The procedures in the existing program manual are design to:

- ✓ Prevent illicit discharges;
- ✓ Ensure the proper disposal of waste materials, including landscape wastes;
- ✓ Prevent the discharge of wastewater or vehicle wash water or both into the MS4;
- ✓ Require implementation of BMPs when discharging water pumped from utility construction and maintenance activities;
- ✓ Minimize the pollutants in stormwater runoff from bulk storage areas (e.g., salt storage, topsoil stockpiles) through the use of best management practices;
- ✓ Prevent pollutant discharge into the MS4 from leaking municipal automobiles and equipment; and
- ✓ Ensure that the application of materials, including fertilizers and pesticides, is conducted in accordance with the manufacturer's recommendations.

The following will be maintained on the VHCC MS4 Program webpage, described in BMP 2A, and is incorporated into this Program Plan, by reference:

- ✓ *VHCC Good Housekeeping/Pollution Prevention Program Manual and Integrated SWPPP* that includes the written procedures for the operations and maintenance activities that may occur on the VHCC campus.

### **Necessary SOPs or Policies for BMP 6A**

The written procedures described within the latest version of the *VHCC Good Housekeeping/Pollution Prevention Program Manual and Integrated SWPPP* 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 *VHCC Good Housekeeping/Pollution Prevention*

*Program Manual and Integrated SWPPP* 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 description of any illicit discharges originating from campus operations and maintenance activities; and
- ✓ A summary of any modifications to operational procedures in the *VHCC Good Housekeeping/Pollution Prevention Program Manual and Integrated SWPPP* to prevent future occurrences of illicit discharge(s), if applicable.

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

VHCC will continue to implement the college’s existing campus-wide stormwater pollution prevention plan (SWPPP) as integrated into the *VHCC Good Housekeeping/Pollution Prevention Program Manual and Integrated SWPPP*. The VHCC SWPPP will continue to incorporate the following components, as required by the General Permit:

- ✓ Campus map identifying outfalls, direction of stormwater flows, source controls, and receiving waters;
- ✓ Description and checklist of potential pollutants and sources;
- ✓ Description of potential nonstormwater discharges;
- ✓ Written procedures to prevent/reduce discharges;
- ✓ A description of applicable training (see also BMP 6C);
- ✓ Procedures for an annual comprehensive campus compliance evaluation;
- ✓ Inspection frequency for source controls with documentation mechanisms; and
- ✓ Requirement to log unauthorized discharges (see also BMP 3C).

As a conservative approach, VHCC developed a campus-wide stormwater pollution prevention plan (SWPPP) instead of developing separate SWPPPs for discrete areas of campus where minor and periodic activities may trigger the requirements for a SWPPP. Since the SWPPP covers the entirety of the regulated campus, a list of high priority facilities and an annual review of high-priority areas for high potential to discharge pollutants, as required by the permit, are not applicable.

The following will be maintained on the VHCC MS4 Program webpage, described in BMP 2A, and is incorporated into this Program Plan, by reference:

- ✓ *VHCC Good Housekeeping/Pollution Prevention Program Manual* that includes the written procedures for the operations and maintenance activities that may occur on the VHCC campus.

A hardcopy of the SWPPP will also be maintain on the campus and readily available to grounds staff for referencing and logging information, as necessary.

**Necessary SOPs or Policies for BMP 6B**

The written procedures described within the latest version of the *VHCC Good Housekeeping/Pollution Prevention Program Manual and Integrated SWPPP* define the necessary SOPs and policies for implementation of this BMP.

### **Measurable Goal for BMP 6B Evaluation**

The objective of the SWPPP 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, within 30 days, the related sections of the *VHCC Good Housekeeping/Pollution Prevention Program Manual and Integrated SWPPP* will be reviewed in context to the occurrence(s) for potential modifications to prevent future occurrences. The SWPPP will be updated to include any modifications found to be necessary within 90 days of the illicit discharge occurrence.

### **Annual Reporting for BMP 6B**

Annual reporting for this BMP is the same as described for BMP 6A.

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

VHCC lands are regulated under § 10.1-104.4 of the Code of Virginia that requires implementation of nutrient management plans (NMPs). VHCC 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  $\geq$  1-acre where nutrients are applied. At this time, VHCC does not apply nutrients on campus. If at such time this practice changes, a NMP, in accordance with this BMP and the General Permit will be developed and incorporated, by reference, into this Program Plan.

In the case a NMP becomes necessary and is developed, it will become available on the VHCC MS4 Program webpage, described in BMP 2A, and will incorporate the following items required for inclusion of this Program Plan:

- ✓ The total acreage on which nutrients are applied;
- ✓ The date of the latest Department of Conservation and Recreation (DCR) nutrient management plan approval; and
- ✓ The location in which the nutrient management plan is located.

In an effort to mitigate nutrient loadings to the MS4, VHCC 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**

In the case a NMP becomes necessary and is developed, it will serve as the necessary SOPs and policies for implementation of this BMP.

### **Measurable Goal for BMP 6C Evaluation**

The objective of the NMP is to ensure appropriate application of nutrients to minimize nutrient loadings to the MS4. In the case a NMP becomes necessary, effectiveness will be based on the completeness of an application record incorporated into the plan and adherence to the plan's application guidance.

### **Annual Reporting for BMP 6C**

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.

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

VHCC 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. VHCC will implement this BMP with the use of contractor 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 *VHCC Good Housekeeping/Pollution Prevention Program Manual and Integrated SWPPP*, described in BMP 6A.

For contractors applying pesticides or herbicides, VHCC 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 *VHCC Good Housekeeping/Pollution Prevention Program Manual and Integrated SWPPP*. 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 assessment of the number of illicit discharges annually 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**

VHCC will continue implementing the college’s Good Housekeeping/Pollution Prevention Training Plan that is incorporated into the following documents:

- ✓ *VHCC IDDE Program Manual*
- ✓ *VHCC Good Housekeeping/Pollution Prevention Program Manual and Integrated SWPPP*

Training will occur, at a minimum, once per 24 months and include training, as incorporated into the Program Manuals, which addresses:

- ✓ Recognition and reporting of illicit discharges; and
- ✓ Pollution prevention and good housekeeping associated with:
  - Road and parking lot maintenance
  - Maintenance or recreational facilities

Training will be in the form of a designated meeting session that will incorporate a PowerPoint and the Program Manuals listed above. The following VHCC staff will be required to participate in training events:

- ✓ Personnel that perform activities that perform activities outdoors, specifically grounds staff;
- ✓ Personnel working in and around maintenance and recreational facilities;
- ✓ Personnel that apply pesticides and herbicides; and
- ✓ Personnel that may be involved with emergency spill response.

For any employees applying pesticides or herbicides, VHCC 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).

In regards to employees and contractors associated with implementing duties associated with the Virginia ESC Law and attendant regulations or the Virginia SWM Act, applicable certifications are ensured with the implementation of the *VCCS Annual Standards and Specifications for ESC and SWM* described in BMP 4A.

### **Necessary SOPs or Policies for BMP 6E**

The necessary policies for implementation of this BMP are this Program Plan BMP and the:

- ✓ *VHCC IDDE Program Manual*;
- ✓ *VHCC Good Housekeeping/Pollution Prevention Program Manual*; and the
- ✓ *VCCS Annual Standards and Specifications for ESC and SWM*

### **Measurable Goal for BMP 6E Evaluation**

The objective of the BMP is to educate applicable VHCC staff in: (1) recognition, reporting, and prevention of illicit discharges and (2) good housekeeping/pollution prevention practices to prevent nonstormwater discharges from activities performed on campus. To measure the effectiveness of the VHCC training, a quiz will be provided at the end of each training session to assess the information obtained 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 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.