



Municipal Separate Storm Sewer System Annual Report

Reporting Period: July 1, 2022 to June 30, 2023

Prepared in Consultation with CVCC by:



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Annual Report Certification

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

Printed Name: Lewis A. Bryant III

Signature: Lewis A Bryant

Title: VP of Finance and Admin

Date: 9/8/2023

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Background and Purpose

Central Virginia Community College (CVCC) 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. CVCC is authorized to discharge stormwater runoff from the campus’s MS4s under the Virginia Stormwater Management Program Regulations, Virginia Pollutant Discharge Elimination System Regulations (VPDES), and the Virginia State Water Control Law.

CVCC 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, CVCC 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 CVCC 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 report is annually completed as summarized in Table 1.

Table 1. General information required for annual reporting.

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

Compliance Summary

Reported information is consistent with the specific annual reporting required in the General Permit and the CVCC MS4 Program Plan, including supplemental information described in the Program Plan to measure effectiveness of each BMP. For use in reference to this annual report, the MS4 Program Plan is provided at the CVCC 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). CVCC has evaluated the effectiveness of each program BMP, as described in the Program Plan. Table 2 summarizes the evaluation to determine if any modifications to the Program Plan are necessary for the subsequent reporting year. If deemed ineffective, please see the reporting for the specific BMP for intended modifications.

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

BMP # 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 Current Nutrient Management Plan	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No
6D	Ensure contract language for controls	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No
6E	Conduct MS4 employee training	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No
SC1	Chesapeake Bay TMDL Action Plan	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No
SC2	James River Bacteria TMDL Action Plans	<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 CVCC MS4 Program Plan to address each MCM is provided below. Information provided is only that explicitly required by the General Permit and the CVCC 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).
- ✓ 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. Public Education on Stormwater Runoff.</i>	<i>Traditional Written Materials (Brochures via email)</i>
<i>2. Public Education on TMDLs and Local Impaired Waters.</i>	<i>Traditional Written Materials (Closed-circuit TVs)</i>
<i>3. Increase applicable staff's knowledge regarding pollutants of concern for TMDL pollutants of concern.</i>	<i>Traditional Written Materials (Posters in Public Areas)</i>

Table 1A-2. Metrics and public survey results used for measure of effectiveness.

Measure of Effectiveness
<i>Issue #1: 500 email recipients twice in the reporting period. Issue #2 and #3: Provided in public areas to receive many engagements. Effectiveness measure: As two-year colleges, biennial public surveys to measure the impact of the program are conducted by 7 VCCS colleges with similar programs (> 1,000 participants). During the permit cycle, results have showed a slight increase in average survey scores that measure program knowledge: 73.2% (2019), 73.2% (2021), 75.8% (2023).</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 CVCC 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://centralvirginia.edu/facilities-management	
An annual review of the website conducted to ensure all information required to be posted on the website was performed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Description of updates implemented during the reporting year: <i>(1) Addition of the 2021-2022 MS4 Annual Report; (2) Replacement document for written procedures for Good Housekeeping/Pollution Prevention and IDDE – now contained in the CVCC Staff Handbook for Good Housekeeping and Pollution Prevention; (3) Supplement to Chesapeake Bay TMDL Action Plan – CB Compliance Reassessment Report.</i>	
<i>In addition, CVCC provides additional educational information and tracks page views, as follows:</i>	
<ul style="list-style-type: none"> • <i>Pet Waste Video – 47 page views</i> • <i>Rubber Duck Stormwater Runoff – 37 page views</i> • <i>Rubber Duck Stormwater Runoff -Español – 26 page views</i> • <i>Duck Man Interview on Stormwater Runoff – 30 page views</i> • <i>Devil Ducks Stormwater Runoff – 34 page views</i> • <i>Rake Up, Sweep Up Stormwater Runoff – 28 page views</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 CVCC 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>1</i>	Number of instances closed: <i>1</i>	Percent of instances closed: <i>100%</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 activity²	Report on the Metric to measure benefit to water quality	Beneficial to Improving water quality?
<i>Pollution prevention</i>	<i>Implementation and maintenance of storm drain marker program.</i>	<i>All inlets marked. A minimum of 20% of markers inspected and maintained annually.</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>Educational Events</i>	<i>Fall Picnic MS4 Booth w/ brochures, posters and free giveaways on 9/15/22</i>	<i>Between 215 – 225 students engaged with the booth.</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>Educational Events</i>	<i>Held “Stormwater Environmental Impacts” Presentation on 4/18/23</i>	<i>11 attendees</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>Educational Events</i>	<i>Spring Picnic MS4 Booth w/ brochures, posters and free giveaways on 4/27/23</i>	<i>Between 215 – 225 students engaged with the booth.</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

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

² CVCC did not collaborate with any other MS4 permittees for any of the listed activities.

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
If yes, please described necessary BMP modifications to improve effectiveness: N/A	

MCM 3: Illicit Discharge Detection and Elimination

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

BMP 3A – Maintain MS4 Map and Information Table

Annual reporting associated with this BMP requires:

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

Certification Statement: MS4 Map & Information Table Updates	Confirm?
<p><i>“In accordance with the General Permit and the CVCC Program Plan, CVCC 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	
Does the measure of BMP effectiveness require Program Plan modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

BMP 3B – Prohibition of Unauthorized Non-stormwater Discharges

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

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

Illicit Discharge Prohibition Enforcement		
(If applicable, instances are added below of illicit discharges purposefully caused by the CVCC Public)		
No.	Add Instance	Disciplinary action taken? (Yes / No)
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 *CVCC 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 I *CVCC 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 outfalls and points of interconnection with other MS4s screened as part of dry weather screening program.	9
Total number of CVCC outfalls and points of interconnection.	9*
Were 100% of outfalls screened during the reporting year?	Yes

* Note the total number of outfalls has changed based on revised mapping resulting from field reconnaissance during the reporting period. Updated mapping available upon request.

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

MCM 4: Construction Site Stormwater Runoff Control

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

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

Annual reporting associated with this BMP requires:

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

Certification Statement: Adherence to the VCCS Standards & Specifications for ESC	
Confirmation Statement: <i>“In accordance with the General Permit and the CVCC Program Plan, CVCC 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: 3 (<i>Maintenance Plan for Bioretention Facility and Drainage Channel</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 discharges originating from land disturbance activity of the total illicit discharge reports (Illicit Discharge Investigation forms in Appendix A if > zero); and
- ✓ Any potential changes to the subsequent annual standards and specifications to prevent future occurrences.

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 CVCC 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 CVCC Program Plan, CVCC confirms that any 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

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 CVCC’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 for the reporting year is: 2	
Was at least one inspection performed on each CVCC SWM facility during the reporting year?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were any significant maintenance, repair, or retrofit activities necessary to ensure the BMP performs as designed as a result of inspection?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Provide the BMP ID and a description of any significant maintenance, including an assessment of the timeliness of the needed actions. <ul style="list-style-type: none"> • <i>No significant maintenance/repair problems identified. As listed in reporting for BMP 4A, significant maintenance work was performed for BMP #2 (bioretention) during the reporting period. Only minor routine maintenance items identified during annual inspections. The annual inspection reports are available upon request.</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) CVCC submitted SWM facility information through the Virginia Construction Stormwater General Permit database for those land disturbing activities for which coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities was required or (2) CVCC did not complete any projects requiring coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities.
 - If information was not submitted, an explanation as to why with a schedule for submission of the required information.
- ✓ A confirmation statement that CVCC electronically reported, no later than the submission date of this annual report, SWM facilities and BMPs implemented between July 1 and June 30 using the DEQ BMP Warehouse that were installed to control post-development stormwater runoff from land disturbing activities less than one acre in accordance with the Chesapeake Bay Preservation Act regulations (9VAC25-830) and for which a General VPDES Permit for Discharges of Stormwater from Construction Activities was not required and the date on which the information was submitted.
 - If information was not submitted, an explanation as to why with a schedule for submission of the required information.

Certification Statement: Report to Virginia Construction Stormwater General Permit Database (Not Applicable for Reporting Year)	
Confirmation Statement: <i>“CVCC 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 If not applicable (N/A), no projects were completed during the reporting year that required coverage; or if an applicable project was completed, a stormwater management facility was not installed as part of the project. See following certification statement.

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

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

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

Certification Statement: Report to the DEQ BMP Warehouse (Not Applicable for Reporting Year)	
<p>Confirmation Statement: <i>“CVCC did not install SWM facilities and BMPs to control post-development stormwater runoff from land disturbing activities less than one acre in accordance with the Chesapeake Bay Preservation Act Regulations (9VAC25-830) and for which a General VPDES Permit for Discharges of Stormwater from Construction Activities was not required.”</i></p>	<p>Marked box below is confirmation <input checked="" type="checkbox"/></p>

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>

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 CVCC 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 *CVCC Staff Handbook for 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
Total number of illicit discharges originating from campus operations of maintenance activities:	0
Describe any potential changes to the <i>CVCC Staff Handbook for Good Housekeeping and Pollution Prevention</i> to prevent future occurrences, if applicable: <i>N/A</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 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 CVCC apply nutrients during the reporting year?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>CVCC has, and implements, a Nutrient Management Plan for the Lynchburg campus for a total of 20.74 acres that was approved by the Department of Conservation and Recreation and is valid through August 1, 2025.</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 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 *CVCC 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>April 18, 2023</i>
Date of previous training:	<i>June 24, 2021</i>
Has training continued to be provided every other year?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Number of employees that attended the latest training event.	<i>11</i>
Number of employees identified to be required to participate in training (as defined by the general permit and program plan).	<i>11</i>
Percent of those identified that attended training.	<i>100%</i>
Did the percentage of those identified to be required to attend training attend?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
A description of the objective of the latest training event: <i>Familiarize staff with the MS4 program, recognition and reporting of illicit discharges, the Staff Handbook for Good Housekeeping and Pollution Prevention, and priority areas on campus.</i>	
Average quiz score from latest training event.	<i>82%</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

Special Conditions for Total Maximum Daily Load Waste Load Allocations

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

BMP SC1 – Chesapeake Bay TMDL Action Plan

Annual reporting associated with this BMP requires the following:

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

Chesapeake Bay TMDL Action Plan Annual Reporting			
<p><i>During the reporting period, CVCC contracted H2R Engineering to provide a Preliminary Engineering Report (PER) to assess the compliance of the college’s TMDL Action Plan (Plan). The PER currently serves as an amendment to the TMDL Action Plan which will be revised during the current reporting period. The assessment found the Plan, developed by and previously reported on by another consultant, was incorrectly applying DEQ computation methodologies, overestimating reductions that could be achieved from street sweeping. As a result, correct computations identified the inability to achieve the required reductions with street sweeping. The reassessment evaluated all other potential means and methods for achieving reduction targets within the required timeframes. With several scenarios evaluated, due to physical and time constraints, the purchase of nutrient credits was identified as the most feasible cost-effective option. CVCC subsequently procured nutrient credits consistent with §62.1-44.19:21 and §62.1-44.19:21 of the Code of Virginia. The Affidavit of Sale is provided in Appendix B.</i></p>			
Pollutant	Total Annual Reductions Required by 2023 (lbs/yr)	Total Annual Reductions Required by 2028 (lbs/yr)	Perpetual Nutrient Credits Purchased (lbs/yr)
TN	10.37	25.93	33.73
TP	2.62	6.55	6.60
TSS	1,192.12	2,980.3	3,495.37
Are reductions progressing to achieve targets?			Yes - Achieved
Were any modifications made to the action plan?			Yes, as described above.

BMP SC2 – James River - Lynchburg Bacteria TMDL Action Plan

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

James River – Lynchburg Bacteria TMDL Action Plan Status Report	
<p><i>The CVCC James River Bacteria TMDL Action Plan requires characterization of the bacteria loadings from the campus, the WLA and potential bacteria sources that could originate on campus. The Plan also describes the practices in place to ensure bacteria loadings are not increased overtime, specifically with:</i></p> <ul style="list-style-type: none"> • <i>Continued implementation of the existing MS4 Program Plan;</i> • <i>Modifications to the MS4 Program’s supporting documents, as applicable, to incorporate bacteria as a local TMDL pollutant of concern; and</i> • <i>Implementation of at least one strategy from Table 5 of the MS4 General Permit.</i> <p><i>During the reporting period, CVCC:</i></p> <ul style="list-style-type: none"> • <i>Continued implementation of the MS4 Program Plan BMPs described in the Action Plan;</i> • <i>Continued incorporation of modifications to applicable supporting program documents; and</i> • <i>Began implementation of a dumpster inspection strategy as a potential bacteria source on campus (dry weather urban flow strategy from Table 5 of the MS4 General Permit).</i> <p><i>Inspection reports can be provided upon request.</i></p>	
Is the Action plan being implemented?	<i>Yes</i>
Were any modifications made to the action plan?	<i>No</i>
Plan Updates: <i>N/A</i>	

Appendix A – IDDE Documentation

ILLICIT DISCHARGE INVESTIGATION FORM

- 1) Date potential, suspect or obvious Illicit Discharge observed or reported: June 1, 2023
- 2) Initial Characterization (as identified on screening form):
 Potential Suspect Obvious None (reported)
- 3) Description of the potential, suspect or obvious Illicit Discharge:
Masonry work was being completed for a small addition on Framatome hall. The job has been ongoing since December 2022 without issue. Mortar residue was observed near a DI to POI #5, indicating something had been poured in the DI. The masonry subcontractor was in the area cleaning tools and pressure washing the brick. Subcontractor indicated they had poured water down the drain that contained residual mortar.
- 4) Date of the start of the investigation: June 1, 2023
- 5) Investigation methods and findings: See below.
- 6) Was the discharge eliminated (resolved)?
 Yes No
- 7) If “Yes” answered in Item # 6, provide the resolution to eliminate the discharge:
Lee Hixon (H2R Engineering) was contacted immediately. The subcontractor was advised to stop work. The DI cover was removed the next morning and no residue was observed in the sump. In the upper portion of the DI there was a small amount of sand and masonry residue that accumulated from the water and mason mix that they had poured into it. The prime contractor agreed to block-off the discharge pipe from the DI and carefully remove all material that was adhered to the concrete around the upper interior of the DI. They were also advised to never place anything into the outfall. The contractor also agreed to use shovels, brooms, and cleaning clothes to remove any remaining exterior residue. CVCC FMS confirmed completion of clean-up work on June 5, 2023.
- 8) If “No” answered in Item # 6, described the reasons:
- 9) Are any addition follow up action necessary (i.e. the discharge anticipated to recur)?
 Yes No
- 10) If yes, describe follow up actions with a timeline to perform the actions. N/A

Appendix B – Chesapeake Bay TMDL Action Plan – Nutrient Credit Purchase Documentation

Exhibit A

AFFIDAVIT OF PHOSPHORUS CREDIT SALE

Eco-Cap, LLC, a Virginia limited liability company (the "Company"), hereby certifies the following:

- Pursuant to Purchase Order # PO04291431 the Company for the benefit of the Central Virginia Community College ("Buyer"), agreed to sell from its Bush Park Nutrient Bank in Cumberland County, Virginia, **6.60** pounds of nonpoint source phosphorus Credits to Buyer and retire the associated ratio of nonpoint source nitrogen credits at the credit generating facility in the amount of **33.73** pounds of nitrogen credits;
- The Company and the Buyer, as of the date hereof, have closed the transaction and the Company has sold to Buyer the **6.60** pounds of phosphorus Credits.

WITNESS the following signature:

Eco-Cap, LLC, a Virginia limited liability company

By: [Signature]
Casey Jensen of Eco-Cap, LLC

Date: 4/24/23

Commonwealth of Virginia

County of [Signature] City of Powhatan, to-wit:

Sworn to and subscribed before me this 24th day of April, 2023, by Casey J. Jensen, (Authorized Representative), on behalf of Eco-Cap, LLC, a Virginia limited liability company.

My commission expires: 08.31.2026

[Signature]
Notary Public



Project Name: IFB#: VCCS-Multi-23-11888
Permittee: Central Virginia Community College
Phosphorus Credits: 6.60 lbs.
Associated Nitrogen Credit: 33.73 lbs.

Exhibit B

Eco-Cap, LLC

BILL OF SALE

BILL OF SALE, made as of April 25th, 2023, by Eco-Cap, LLC, a Virginia limited liability company ("Seller"), to **Central Virginia Community College** ("Buyer").

WHEREAS, Pursuant to Pursuant to Purchase Order # PO04291431 the Seller for the benefit of the Buyer, agreed to sell from its Bush Park Nutrient Bank in Cumberland County, Virginia, **6.60** pounds of nonpoint source phosphorus Credits to Buyer and retire the associated ratio of nonpoint source nitrogen credits at the credit generating facility in the amount of **33.73** pounds of nitrogen credits;

NOW, THEREFORE, for and in consideration of the payment of the Purchase Price (as defined in the Invoice) and other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, Seller hereby sells, transfers, assigns, conveys, delivers and sets over to Buyer, its successors and assigns, **6.60** pounds of phosphorus Credits and retires **33.73** pounds of nitrogen credits associated with the phosphorous Credits generated at the Bush Park Nutrient Bank.

TO HAVE AND TO HOLD all such phosphorus Credits hereby sold and transferred to Buyer and its successors and assigns forever.

IN WITNESS WHEREOF, Seller has caused this Bill of Sale to be executed by its duly authorized representative as of the date first above written.

Eco-Cap, LLC

By: cf
Casey Jensen of Eco-Cap, LLC

Project Name: IFB#: VCCS-Multi-23-11888
Permittee: Central Virginia Community College
Phosphorus Credits: 6.60 lbs.
Associated Nitrogen Credit: 33.73 lbs.