



Facilities Services Department
14800 Joplin Road
Manassas, VA 20112

Municipal Separate Storm Sewer System Program Plan

For

General Permit No. VAR040100

During

Permit Year 2022 - 2023

From November 1, 2018 until October 31, 2023, in accordance with the VAR040100 General Permit Prince William County Public School (PWCS) is authorized to discharge stormwater and authorized non-stormwater discharges described in 9VAC25-890-20 D from the small municipal separate storm sewer system into surface waters within the boundaries of the Commonwealth of Virginia consistent with 9VAC25-890-30.

June 30, 2023

TABLE OF CONTENTS

APPENDICES ii

LIST OF TABLES ii

ACRONYMS ii

DEFINITIONS..... iv

1.0 MS4 PROGRAM PLAN..... 1

 1.1 Minimum Control Measures..... 1

 1.2 Special Conditions for TMDLs 2

 1.3 Roles and Responsibilities (Part I C 1 a & b) 2

 1.4 Program Modifications (Part I C 4) 2

 1.5 List of Reference Materials (Part I C 1 d) 3

 1.6 Annual Reporting (Part I D)..... 3

2.0 SCHEDULE 4

3.0 PROGRAM PLAN BEST MANAGEMENT PRACTICES..... 5

 BMP 1.1 Public Education and Outreach Program (Part I E 1) 5

 BMP 2.1 Webpage Dedicated to MS4 Program & Stormwater Pollution Prevention (Part 1 E 2 a/b). 9

 BMP 2.2 Public Involvement and Participation (Part 1 E 2 c) 11

 BMP 3.1 Storm Sewer Map and Outfall Information Table (Part 1 E 3 a) 13

 BMP 3.2 Prohibit Non-Stormwater Discharges (Part 1 E 3 b)..... 15

 BMP 3.3 Implement Illicit Discharge Detection and Elimination Procedures (Part 1 E 3 c) 16

 BMP 4.1 ESC Compliance for Land Disturbing Activities (Part 1 E 4)..... 18

 BMP 5.1 Compliance to Post-Construction Stormwater Management Regulation (Part 1 E 5)..... 19

 BMP 5.2 Stormwater Management Facility Tracking and Reporting (Part I E 5 d)..... 21

 BMP 6.1 Pollution Prevention Procedures for Operations & Maintenance Activities (Part 1 E 6)..... 23

 BMP 6.2 Campus Stormwater Pollution Prevention Plan (Part 1 E 6 c) 24

 BMP 6.3 Turf and Landscape Management (Part I E 6 j) 27

 BMP 6.4 Contractor Safeguards, Measures and Procedures (Part I E 6 l) 32

 BMP 6.5 Contractor Certification for Pesticide Application (Part I E 6 m 4)..... 33

 BMP 6.6 Employee Good Housekeeping/Pollution Prevention Training Plan (Part 1 E 6 m)..... 34

 3.1 SPECIAL CONDITIONS FOR THE CHESAPEAKE BAY TMDL 36

 BMP CB-SC.1 Chesapeake Bay TMDL Action Plan (Part II A) 36

 BMP CB-SC.2 Chesapeake Bay TMDL Action Plan Implementation (Part II A) 38

 3.2 SPECIAL CONDITIONS FOR LOCAL TMDLS 39

 BMP SC1.1 Broad Run, Little Bull Run, Bull Run, Occoquan River Bacteria TMDL Action Plan (Part II B) 40

 BMP SC1.2 Neabsco Creek Bacteria TMDL Action Plan Implementation (Part II B) 43

 BMP SC1.3 Cedar Run and Licking Run Bacteria TMDL Action Plan Implementation (Part II B) 44

 BMP SC1.4 Potomac River Tributaries in Prince William County and Stafford Counties Bacteria TMDL Action Plan Implementation (Part II B)..... 45

 BMP SC2.1 Bull Run Sediment TMDL Action Plan (Part II B)..... 46

 BMP SC3.1 Tidal Potomac and Anacostia Rivers PCB TMDL Action Plan (Part II B)..... 51

APPENDICES

No table of figures entries found.

LIST OF TABLES

Table 1: Summary of Critical Items and Deadlines for Program Implementation..... 4
Table 2: Strategies for Public Education and Outreach 5
Table 3: Anticipated Public Education & Outreach Activities for 2022 – 2023 Permit Year..... 6
Table 4: Public Involvement Opportunities 11
Table 5: Anticipated Public Involvement Activities for 2022 – 2023 Permit Reporting Year 11
Table 6: List of Interconnected MS4 Regulated Area(s) 14
Table 7: List of High Priority Facilities 25
Table 8: List of Lands where Nutrient Management Plans are Required 27
Table 9: 2023-2028 Chesapeake Bay TMDL Action Plan Implementation Schedule 38
Table 10: Strategies for Bacteria Reduction Stormwater Control/Management Strategy..... 40
Table 11: Bacteria TMDL Action Plan Summary of Actions..... 42
Table 12: Bacteria TMDL Action Plan Summary of Actions..... 43
Table 13: Bacteria TMDL Action Plan Summary of Actions..... 44
Table 14: Bacteria TMDL Action Plan Summary of Actions..... 45
Table 15: Street Sweeping Using the Lane Mile Approach..... 47
Table 16: Schedule for PWCS’ Sediment TMDL Action Plan..... 49
Table 17: Schedule of Anticipated Actions Planned for Implementation of PCB Reduction..... 51

ACRONYMS

BMP	Best Management Practice
DCR	Virginia Department of Conservation and Recreation
DEQ	Virginia Department of Environmental Quality
ESC	Erosion and Sediment Control
HUC	Hydrologic Unit Code
MEP	Maximum Extent Practicable
MCM	Minimum Control Measure
MS4	Municipal Separate Storm Sewer System
NMP	Nutrient Management Plan
POC	Pollutants of Concern
PWC	Prince William County
PWCS	Prince William County Schools
SWM	Stormwater Management
SWPPP	Stormwater Pollution Prevention Plan
TMDL	Total Maximum Daily Load
VPDES	VAR04 General Virginia Pollutant Discharge Elimination System Permit for Discharges of Stormwater from Small Municipal Separate Storm Sewer Systems
VCACS	Virginia Department of Agriculture and Consumer Services
VESCP	Virginia Erosion and Sediment Control Program
VSMA	Virginia Stormwater Management Act

VSMP
WLA

Virginia Stormwater Management Program
Waste Load Allocation

DEFINITIONS

"Best management practice" means schedules of activities, prohibitions of practices, including both structural and nonstructural practices, maintenance procedures, and other management practices to prevent or reduce the pollution of surface waters and groundwater systems from the impacts of land-disturbing activities.

"Chesapeake Bay Preservation Act land-disturbing activity" means a land-disturbing activity including clearing, grading, or excavation that results in a land disturbance equal to or greater than 2,500 square feet and less than one acre in all areas of jurisdictions designated as subject to the Chesapeake Bay Preservation Area Designation and Management Regulations (9VAC25-830) adopted pursuant to the Chesapeake Bay Preservation Act.

"Chesapeake Bay Watershed" means all land areas draining to the following Virginia river basins: Potomac River Basin, James River Basin, Rappahannock River Basin, Chesapeake Bay and its small coastal basins, and York River Basin.

"Construction activity" means any clearing, grading or excavation associated with large construction activity or associated with small construction activity.

"Date brought online" means the date when PWCS determines that a new stormwater management facility is properly functioning.

"Discharge," when used without qualification, means the discharge of a pollutant.

"Drainage area" means a land area, water area, or both from which runoff flows to a common point.

"High-priority facilities" means facilities owned or operated by PWCS that actively engage in one or more of the following activities: (i) composting, (ii) equipment storage and maintenance, (iii) materials storage, (iv) pesticide storage, (v) storage for public works, (vi) recycling, (vii) salt storage, (viii) solid waste handling and transfer, and (ix) vehicle storage and maintenance.

"Hydrologic Unit Code" means a watershed unit established in the most recent version of Virginia's 6th Order National Watershed Boundary Dataset.

"Illicit discharge" means any discharge to a municipal separate storm sewer that is not composed entirely of stormwater, except discharges resulting from firefighting activities (Discharges or flows from firefighting activities need only be addressed where they are identified as significant sources of pollutants to surface waters.), water line flushing, landscape irrigation, diverted stream flows, rising groundwaters, uncontaminated groundwater infiltration, uncontaminated pumped groundwater, discharges from potable water sources, foundation drains, air conditioning condensation, irrigation water, springs, water from crawl space pumps, footing drains, lawn watering, individual residential car washing, flows from riparian habitats and wetlands, dechlorinated swimming pool discharges, street wash water, noncommercial fundraising car washes if the washing uses only biodegradable, phosphate-free, water-based cleaners; or other activities generating discharges identified by the department as not requiring VPDES authorization.

"Impervious cover" means a surface composed of material that significantly impedes or prevents natural infiltration of water into soil.

"Land disturbance" or "land-disturbing activity" means a manmade change to the land surface that potentially changes its runoff characteristics including clearing, grading, or excavation, except that the term shall not include the following potential activities:

- Land-disturbing activities that disturb less than 2,500 square feet in all areas of the jurisdictions designated as subject to the Chesapeake Bay Preservation Act or activities that are part of a larger common plan of development or sale that is one acre or greater of disturbance;
- Routine maintenance that is performed to maintain the original line and grade, hydraulic capacity, or original construction of the project. The paving of an existing road with a compacted or impervious surface and reestablishment of existing associated ditches and shoulders shall be deemed routine maintenance;
- Land-disturbing activities in response to a public emergency where the related work requires immediate authorization to avoid imminent endangerment to human health or the environment. In such situations, DEQ shall be advised of the disturbance within seven days of commencing the land-disturbing activity, and compliance with the administrative requirements within 30 days of commencing the land-disturbing activity.

"Municipal separate storm sewer system" means a conveyance or system of conveyances including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains.

"MS4 Program Plan" means the completed registration statement and all approved additions, changes and modifications detailing the comprehensive program implemented by the operator under this state permit to reduce the pollutants in the stormwater discharged from its municipal separate storm sewer system (MS4) that has been submitted and accepted by DEQ.

"MS4 regulated service area" or "service area" means for Phase II permittees, the drainage area served by PWCS' MS4 that is located within an urbanized area as determined by the 2010 decennial census performed by the Bureau of the Census. MS4 regulated service area may also be referred to as "served by the MS4" as it pertains to the tables in Part II A of this permit.

"Outfall" means, when used in reference to municipal separate storm sewers, a point source at the point where a MS4 discharges to surface waters and does not include open conveyances connecting two municipal separate storm sewers, or pipes, tunnels or other conveyances which connect segments of the same stream or other surface waters and are used to convey surface waters.

"Physically interconnected" means that one MS4 is connected to a second MS4 in such a manner that it allows for direct discharges to the second system.

"Pollutants of concern" means pollutants specifically identified in a U.S. Environmental Protection Agency approved total maximum daily load report as causing a water quality impairment.

"Public" means, for the purpose of this Program Plan, the students, faculty, and staff population attending or employed by Northern Virginia Community College.

"Point of discharge" means a location at which concentrated stormwater runoff is released.

"State waters" means all water, on the surface and under the ground, wholly or partially within or bordering the Commonwealth or within its jurisdiction, including wetlands.

"Stormwater" means precipitation that is discharged across the land surface or through conveyances to one or more waterways and that may include stormwater runoff, snow melt runoff, and surface runoff and drainage.

"Stormwater management plan" means a document(s) containing material for describing methods for complying with the requirements of the Virginia Stormwater Management Program.

"Total maximum daily load" means the sum of the individual wasteload allocations for point sources, load allocations for nonpoint sources, natural background loading and a margin of safety. TMDLs can be expressed in terms of either mass per time, toxicity, or other appropriate measure. The TMDL process provides for point versus nonpoint source trade-offs.

"Wasteload allocation" or "wasteload" means the portion of receiving surface water's loading or assimilative capacity allocated to one of its existing or future point sources of pollution. WLAs are a type of water quality-based effluent limitation.

"Watershed" means a defined land area drained by a river or stream, karst system, or system of connecting rivers or streams such that all surface water within the area flows through a single outlet.

1.0 MS4 PROGRAM PLAN

The Program Plan when implemented constitutes compliance with the standard of reducing pollutants to the maximum extent practicable (MEP) of the VAR04 General Virginia Pollutant Discharge Elimination System (VPDES) Permit for Discharges of Stormwater from Small Municipal Separate Storm Sewer Systems (MS4s), referred to in the remainder of this Plan as the General Permit.

1.1 Minimum Control Measures

The General Permit requires the Program Plan to include Best Management Practices (BMP) to address the requirements of six minimum control measures (MCMs) described in Part I E of the General Permit. The MCMs are summarized as:

- MCM 1: Public Education and Outreach on Stormwater Impacts
- MCM 2: Public Involvement and Participation
- MCM 3: Illicit Discharge Detection and Elimination
- MCM 4: Construction Site Stormwater Runoff Control
- MCM 5: Post-construction Stormwater Management
- MCM 6: Pollution Prevention/Good Housekeeping for Operations

Section 3.1 of this Program Plan includes BMPs developed to explicitly address the General Permit requirements for each MCM. The title of each BMP is followed with a reference to the corresponding permit section. Each BMP included in the Program Plan is intended to specifically address permit requirements and includes the following information described in Part I C of the General Permit:

- The roles and responsibilities of each of the PWCS divisions and departments in the implementation of the requirements of the permit tasked with ensuring that the permit requirements are met;
- If PWCS utilizes another entity to implement portions of the MS4 Program, a copy of the written agreement. The description of each party's roles and responsibilities, including any written agreements with third parties, shall be updated as necessary;
- For each MCM in Part I E, the following information shall be included:
 - Each specific requirement as listed in Part I E for each MCM;
 - A description of the BMPs or strategies that PWCS anticipates will be implemented to demonstrate compliance with the permit conditions in Part I E;
 - All standard operating procedures or policies necessary to implement the BMPs;
 - 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; and
- A list of documents incorporated by reference including the version and date of the document being incorporated.

1.2 Special Conditions for TMDLs

PWCS is subject to the Special Conditions for the Chesapeake Bay TMDL that requires the development and submission to DEQ, for its review and acceptance, an approvable second phase TMDL Action Plan. PWCS submitted to DEQ the Chesapeake Bay TMDL Action Plan. A BMP is provided in Section 3.2 for development of the Action Plan, and a second BMP is developed for implementation of the Action Plan. BMPs are also provided to ensure PWCS annually determines if a wasteload allocation (WLA) has been assigned during the reporting year and to provide public opportunity for participation in development of new TMDLs.

PWCS is currently subject to several Local TMDLs which include: the Bull Run Benthic TMDL, Tidal Potomac and Anacostia River PCB TMDL, Tributaries of the Potomac Bacteria TMDL, Neabsco Creek Bacteria TMDL, and the Broad Run, Little Bull Run, Bull Run, and Occoquan River Bacteria TMDL. PWCS has submitted Action Plans for these Local TMDLs. Where PWCS is assigned a WLA for a Local TMDL, an action plan will be developed and included by reference in this Program Plan.

1.3 Roles and Responsibilities (Part I C 1 a & b)

Each BMP lists the individual(s) responsible for implementation. At PWCS, the Environmental Project Manager implements the MS4 Program Plan and the Director of Facilities Services is the signatory authority in accordance with Part III K. PWCS uses Prince William County (PWC) to assist with implementation of portions of Minimum Control Measure #4. PWC conducts ESC and VSMP plan review. PWCS provides inspection, enforcement, and reporting for MCM #4.

1.4 Program Modifications (Part I C 4)

Revisions to the MS4 Program plan are expected throughout the life of the General Permit as part of the iterative process to reduce pollutant loading and protect water quality to the MEP. As such, revisions made in accordance with the General Permit because of the iterative process do not require modification of this permit. PWCS shall summarize revisions to the MS4 Program plan as part of the annual report as described in Part I D 2 of the General Permit.

1.5 List of Reference Materials (Part I C 1 d)

The list of documentation below is incorporated into the Program Plan via reference along with any associated maps and forms, where applicable. All necessary documents for implementation not listed here, not provided in the MS4 Program Plan, and may or may not be provided in the annual reports are retained on file for a minimum of 3 years and are available upon request.

- *Illicit Discharge Detection and Elimination Manual, June 2023*
- *Good Housekeeping and Pollution Prevention Manual, June 2023*
- *Post-Construction Stormwater Management Inspection & Maintenance Manual, June 2023*
- *Chesapeake Bay TMDL Action Plan (2018 - 2023 General Permit), November 1, 2019*
- *Bull Run Benthic TMDL Action Plan (2018 – 2023 MS4 General Permit), Update in September 2022*
- *Tidal Potomac and Anacostia Rivers PCB TMDL Action Plan (2018 – 2023 MS4 General Permit), Update September 2022*
- *Tributaries of the Potomac Bacteria TMDL Action Plan (2018 – 2023 MS4 General Permit), Update in September 2022*
- *Neabsco Creek Bacteria TMDL Action Plan, (2018 - 2023 General Permit), Update in September 2022*
- *Broad Run, Little Bull Run, Bull Run, and Occoquan River Bacteria TMDL Action Plan (2018 - 2023 General Permit), October 2022*

1.6 Annual Reporting (Part I D)

This Program Plan includes requirements to satisfy annual reporting of the General Permit:

- PWCS shall submit an annual report to the department no later than October 1 of each year in a format as specified by the department. The report shall cover the previous year from July 1 to June 30.
- The annual report shall include the following general information:
 - PWCS, system name, and permit number;
 - The reporting period for which the annual report is being submitted;
 - A signed certification as per Part III K;
 - Each annual reporting item as specified in an MCM in Part I E; and
 - An evaluation of the MS4 Program implementation, including a review of each MCM, to determine the MS4 Program's effectiveness and whether or not changes to the MS4 Program plan are necessary.
- PWCS shall include a status report on the implementation of the Chesapeake Bay TMDL action plan in accordance with Part II A of this permit including any revisions to the plan.
- When applicable, PWCS shall include a status report on the implementation of the local TMDL action plans in accordance with Part II B including any revisions to the plan.
- For the purposes of the General Permit, the MS4 Program plan and annual report shall be maintained separately and submitted to the department as required by this permit as two separate documents.

2.0 SCHEDULE

Some of the BMPs require Program documents or actions to address permit requirements. Table 1 lists some of these documents and actions with dates critical for assuring compliance with the General Permit. Table 1 is intended to assist with Program Plan implementation.

Table 1: Summary of Critical Items and Deadlines for Program Implementation.		
BMP/Regulation	Necessary Action	Due date*
9VAC-23-890-30	Submit Registration Statement, Draft Chesapeake Bay TMDL Action Plan/Public Comment Period	Completed
9VAC-23-890-40D	Submit Annual Report	Annually (October 1)
2.1	Develop and maintain a stormwater webpage	Completed & Ongoing
2.1	Post updated version of MS4 Program Plan on Permittee's Website	Completed & Ongoing
2.1	Post Annual Report on Website	Annually (Within 30 days)
2.2	Implement Public Participation Activities	4x annually
3.1, 3.5	Update MS4 Map and Information Table	Annually (June 30)
3.1	GIS Shapefile of MS4 Map	Completed
5.2	Update Post Construction electronic database	30 days after new facility online
6.1	Review High Priority Facilities	Annually (June 30)
3.4, 6.1, 6.3	Conduct GHPP/IDDE Training	Once every 24 months
CB-SC.1	Submit Final Chesapeake Bay TMDL Action Plan	Completed
Part III B 1 b	Updated Tributaries of the Potomac Bacteria TMDL Action Plan/Public Comment Period	Completed
Part III B 1 a	Updated Neabsco Creek Bacteria TMDL Action Plan/Public Comment Period	Completed
Part III B 1 a	Updated Broad Run, Little Bull Run, Bull Run, and Occoquan River Bacteria TMDL Action Plan/Public Comment Period	Completed
Part III B 1 a	Updated Bull Run Benthic TMDL Action Plan/Public Comment Period	Completed
Part III B 1 a	Updated Tidal Potomac and Anacostia River PCB TMDL Action Plan/Public Comment Period	Completed

3.0 PROGRAM PLAN BEST MANAGEMENT PRACTICES

This Section includes the BMPs that PWCS will implement to meet the requirements for each MCM and the applicable Special Conditions described in the General Permit.

BMP 1.1 Public Education and Outreach Program (Part I E 1)

Description: PWCS shall implement a public education and outreach program designed to:

- Increase the public's knowledge of how to reduce stormwater pollution, placing priority on reducing impacts to impaired waters and other local water pollution concerns;
- Increase the public's knowledge of hazards associated with illegal discharges and improper disposal of waste, including pertinent legal implications; and
- Implement a diverse program with strategies that are targeted toward individuals or groups most likely to have significant stormwater impacts.

PWCS shall identify no less than three high-priority stormwater issues to meet the goal of educating the public in accordance with Part I E 1 a. High-priority issues may include the following examples: Chesapeake Bay nutrients, pet wastes, local receiving water impairments, TMDLs, high-quality receiving waters, and illicit discharges from commercial sites. The high-priority public education and outreach program, as a whole, shall:

- Clearly identify the high-priority stormwater issues;
- Explain the importance of the high-priority stormwater issues;
- Include measures or actions the public can take to minimize the impact of the high-priority stormwater issues; and
- Provide a contact and telephone number, website, or location where the public can find out more information.

PWCS shall use two or more of the strategies listed in Table 2 below per year to communicate to the public the high-priority stormwater issues identified in accordance with Part I E 1 b including how to reduce stormwater pollution.

Table 2: Strategies for Public Education and Outreach	
Strategies	Examples (not meant to be all inclusive or limiting)
Traditional written materials	Informational brochures, newsletters, fact sheets, utility bill inserts, or recreational guides for targeted groups of citizens
Alternative materials	Bumper stickers, refrigerator magnets, t-shirts, or drink koozies
Signage	Temporary or permanent signage in public places or facilities, vehicle signage, billboards, 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

A summary of the PWCS' anticipated Public Education and Outreach Activities for the permit year are below in Table 3.

Table 3: Anticipated Public Education & Outreach Activities for 2022 – 2023 Permit Year			
#	Water quality Issue	Strategy	Communication
1	Chesapeake Bay Water Quality	Curriculum Materials	2018 Virginia Science Standards of Learning Curriculum Framework taught to students
2	Stormwater Pollution	Speaking Engagements	Custodial Staff Training
3	Illicit Discharge from Local Sources	Traditional Written Materials	Emailed letters to principals and staff
4	Local Waterways	Traditional Written Materials	Northern Virginia Clean Waters Partnership quarterly newsletter

Water Quality Issue No. 1: Chesapeake Bay Water Quality

Rationale: Due to the location of all PWCS schools and sites within Virginia's Coastal Plain, Chesapeake Bay water quality is considered the first high-priority water quality issues.

Public Audience: PWCS students in 4th and 6th grade

Strategy to Communicate High Priority Stormwater Message: Students will be educated and subsequently tested on knowledge of watersheds, stormwater, and water cycles.

Relevant Message: PWCS students will be taught the role clean water plays in the Chesapeake Bay ecosystem and the impact of human actions on water resources to increase individual knowledge about the steps that can be taken to reduce stormwater pollution.

Time Period: The curriculum materials will be taught once during the permit year.

Measurable Goal: PWCS will document the strategies and communication efforts used to teach students the curriculum materials.

Water Quality Issue No. 2: Stormwater Pollution

Rationale: Stormwater pollution training is targeted toward custodial staff, as they are most likely to have significant stormwater impacts.

Public Audience: PWCS custodial staff comprised of approximately 150 employees

Strategy to Communicate High Priority Stormwater Message: Training is provided on the impact of poor housekeeping practices on PWCS properties and how it damages water quality.

Relevant Message: Custodial staff are made aware of the impact of dumping chemicals and cleaning solutions on PWCS properties and are taught the sources and consequences of stormwater pollution. Custodians are trained on IDDE and stormwater for detecting and eliminating illicit discharges on school properties.

Time Period: The custodial training is conducted once within the permit year.

Measurable Goal: PWCS will list the high-priority issues that were addressed and the strategies used to communicate each issue.

Water Quality Issue No. 3: Illicit Discharge from Local Sources

Rationale: It is important to inform schools and staff about stormwater systems at their local facilities and the effects of illicit discharge on water quality.

Public Audience: PWCS schools and staff members

Strategy to Communicate High Priority Stormwater Message: Letters are emailed to inform staff about the stormwater systems at their local facilities.

Relevant Message: Enlist aid in identifying and eliminating any illicit discharge.

Time Period: Letters are emailed once within the permit year.

Measurable Goal: PWCS will list the high-priority issues that were addressed and the strategies used to communicate each issue.

Water Quality Issue No. 4: Local Waterways

Rationale: It is important to educate students and faculty members on drinking water from their local waters and how it affects the stormwater system.

Public Audience: PWCS students and faculty members

Strategy to Communicate High Priority Stormwater Message: A quarterly newsletter is sent from Northern Virginia Clean Waters Partnership.

Relevant Message: Students and faculty are provided information on the importance of local waterways and why they are important. Students learn about their local stormwater system and how they can take action to keep their waterways clean and safe.

Time Period: The newsletter is emailed quarterly within the permit year.

Measurable Goal: PWCS will list the high-priority issues that were addressed and the strategies used to communicate each issue.

Necessary documentation for implementation: (1) Curriculum materials and number of students educated; (2) Training program dates and number of attendees; (3) Dates email letter about stormwater was sent and to whom it was sent; and (4) Quarterly newsletter and dates sent to faculty and staff.

Responsible individual for implementation: PWCS Environmental Project Manager

Implementation schedule: Outreach will be conducted as described above for each water quality issue identified.

Measurable goal: Effectiveness of the BMP will be determined by the completion and necessary documentation of the selected strategies to convey the four water quality issues.

BMP 2.1 Webpage Dedicated to MS4 Program & Stormwater Pollution Prevention (Part 1 E 2 a/b)

Description: PWCS shall develop and implement procedures for the following:

- The public to report potential illicit discharges, improper disposal, or spills to the MS4, complaints regarding land disturbing activities, or other potential stormwater pollution concerns;
- The public to provide input on PWCS' MS4 Program plan;
- Receiving public input or complaints;
- Responding to public input received on the MS4 Program plan or complaints; and
- Maintaining documentation of public input received on the MS4 Program and associated MS4 Program plan and PWCS' response.

When public input or complaints are received concerning the MS4 Program plan via either email or telephone, to either an individual school Facility or directly with the Environmental Project Manager (EPM), the EPM will respond to the input or complaint from the public within a reasonable amount of time. The public input or complaint and the EPM's response will be maintained electronically along with other MS4 related documentation to be reported in the annual report.

No later than February 1, 2019, PWCS shall develop and maintain a webpage dedicated to the MS4 Program and stormwater pollution prevention. The following will be maintained on the PWCS' Stormwater webpage:

- The effective MS4 permit and coverage letter;
- The most current MS4 Program plan or location where the MS4 Program plan can be obtained;
- The annual report for each year of the term covered by this permit no later than 30 days after submittal to the department;
- A mechanism for the public to report potential illicit discharges, improper disposal, or spills to the MS4, complaints regarding land disturbing activities, or other potential stormwater pollution concerns in accordance with Part I E 2 a (1); and
- Methods for how the public can provide input on PWCS' MS4 Program plan in accordance with Part I E 2 a (2)

Webpage address:

https://www.pwcs.edu/departments/facilities/facilities_management/environmental_staff_and_services/stormwater_management

Necessary documentation for implementation: (1) Public input received on the MS4 Program and associated PWCS responses; (2) Effective MS4 Permit and coverage letter; (3) Latest MS4 Program Plan; and (4) All MS4 Annual Reports within permit cycle.

Responsible individual for implementation: PWCS Environmental Project Manager

Implementation schedule: PWCS shall continue to provide mechanisms on the webpage for public input and reporting illicit discharges or complaints. The current Program Plan will be posted on the webpage. Annual reports will be posted on the webpage within 30 days of submittal to DEQ, or by November 1st of each year.

Measurable goal: Effectiveness will be determined by the webpage including: (1) effective MS4 permit and coverage letter;(2) latest MS4 Program Plan; (3) all annual reports developed within the permit cycle no later than 30 days after submittal to the department; (4) a mechanism for the public to report potential illicit discharges, improper disposal, or spills, complaints regarding land disturbing activities, or other potential pollution concerns; (5) methods for public input on the PWCS' MS4 Program Plan and other documents that require a public comment period; (6) responding to public input; and (7) maintaining public input received and PWCS responses.

BMP 2.2 Public Involvement and Participation (Part 1 E 2 c)

Description: PWCS will implement no less than four activities per year for two or more of the categories listed in Table 4 below to provide an opportunity for public involvement to improve water quality and support local restoration and clean-up projects. PWCS may coordinate the public involvement opportunities listed in Table 4 with other MS4 permittees; however, each permittee shall be individually responsible for meeting all of the permit requirements.

Table 5 below provides the anticipated activities for the permit reporting year including:

- A description of the public involvement activities to be implemented by PWCS,
- The anticipated time period the activities will occur, and
- A metric for each activity to determine if the activity is beneficial to water quality. An example of metrics may include the weight of trash collected from a stream cleanup, the number of participants in a hazardous waste collection event, etc.

Table 4: Public Involvement Opportunities	
Public Involvement Opportunity Categories	Examples (provided as example & are not meant to be all inclusive or limiting)
Monitoring	Establish or support citizen monitoring group
Restoration	Stream or watershed clean-up day, adopt-a-water way program,
Educational events	Booth at community fair, demonstration of stormwater control projects, presentation of stormwater materials to schools to meet applicable education Standards of Learning or curriculum requirements, watershed walks, participation on environmental advisory committees
Disposal or collection events	Household hazardous chemicals collection, vehicle fluids collection
Pollution prevention	Adopt-a-storm drain program, implement a storm drain marking program, promote use of residential stormwater BMPs, implement pet waste stations in public areas, adopt-a-street program.

Table 5: Anticipated Public Involvement Activities for 2022 – 2023 Permit Reporting Year			
Category	Activity Description	Time Period Activity to Occur	Metric to Determine Benefit
Educational Event	After The Storm Educational Document	Spring 2023	Date sent out and to whom it was sent
Educational Event	Enviroscape Program	Summer 2023	Date of event and number of students
Educational Event	4H Fair Camp	Summer 2023	Date of event and number of students
Educational Event	Webelos Conservation Good Turn Award	Winter 2023	Date of event and number of scouts

Educational Event	Meaningful Watershed Educational Experience (MWEE)	Spring 2023	Date of event and number of students
Restoration	Tree Planting	Spring 2023	Date of restoration activity and number of students
Educational Event	Conservation Capsules	School Year 2023	Number of teachers and students

Necessary documentation for implementation: (1) A description of public involvement activities to be implemented; (2) Anticipated time period the activities will occur; and (3) Metric for each activity to determine if the activity is beneficial to water quality.

Responsible individual for implementation: PWCS Environmental Project Manager

Implementation schedule: Public participation will be conducted a minimum of four times a year at the anticipated times indicated in Table 5.

Measurable goal: Effectiveness will be determined by the selected metric for each activity.

BMP 3.1 Storm Sewer Map and Outfall Information Table (Part 1 E 3 a)

Description: PWCS shall develop and maintain an accurate MS4 map and information table as follows:

- A map of the storm sewer system owned or operated by PWCS within the census urbanized area identified by the 2010 decennial census that includes, at a minimum:
 - MS4 outfalls discharging to surface waters, except as follows:
 - In cases where the outfall is located outside of the MS4 permittee's legal responsibility, PWCS may elect to map the known point of discharge location closest to the actual outfall; and
 - In cases where the MS4 outfall discharges to receiving water channelized underground, PWCS may elect to map the point downstream at which the receiving water emerges above ground as an outfall discharge location. If there are multiple outfalls discharging to an underground channelized receiving water, the map shall identify that an outfall discharge location represents more than one outfall. This is an option a permittee may choose to use and recognizes the difficulties in accessing outfalls to underground channelized stream conveyances for purposes of mapping, screening, or monitoring.
 - A unique identifier for each mapped item required in Part I E 3;
 - The name and location of receiving waters to which the MS4 outfall or point of discharge discharges;
 - MS4 regulated service area; and
 - Stormwater management facilities owned or operated by PWCS.
- PWCS shall maintain an information table associated with the storm sewer system map that includes the following information for each outfall or point of discharge for those cases in which PWCS elects to map the known point of discharge in accordance with Part I E 3 a (1) (a):
 - A unique identifier as specified on the storm sewer system map;
 - The latitude and longitude of the outfall or point of discharge;
 - The estimated regulated acreage draining to the outfall or point of discharge;
 - The name of the receiving water;
 - The 6th Order Hydrologic Unit Code of the receiving water;
 - 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 PWCS is assigned a wasteload allocation.
- No later than July 1, 2019, PWCS shall submit to DEQ a GIS-compatible shapefile of PWCS' MS4 map as described in Part I E 3 a. If PWCS does not have an MS4 map in a GIS format, PWCS shall provide the map as a PDF document.
- No later than October 1 of each year, PWCS shall update the storm sewer system map and outfall information table to include any new outfalls constructed or TMDLs approved or both during the immediate preceding reporting period.
- PWCS shall provide written notification to any downstream adjacent MS4 of any known physical interconnection established or discovered after the effective date of this permit.

Table 6: List of Interconnected MS4 Regulated Area(s)	
Prince William County	Permit #VA0088595
City of Manassas	Permit #VAR040063
City of Manassas Park	Permit #VAR040070
Town of Dumfries	Permit #VAR040117
Virginia Department of Transportation, Northern Urban Area	Permit #VAR040062
George Mason University, Science and Technology Campus	Permit #VAR040106
Northern Virginia Community College	Permit #VAR040095
US Marine Corps Base Quantico/Federal Bureau of Investigation National Academy	Permit #VAR040069

Necessary documentation for implementation: (1) Storm sewer system map; (2) Outfall Information Table in Appendix B; and (3) GIS compatible shapefile of MS4 map; and (4) If applicable, written notification of physical interconnections to the downstream MS4 will be provided upon request and is incorporated by reference into this Program Plan.

Responsible individual for implementation: PWCS Environmental Project Manager

Implementation schedule: The map and information table will be updated annually at the end of each reporting year. Any new MS4 interconnections will be notified upon discovery.

Measurable goals: Effectiveness will be determined by maintaining an up-to-date map of the storm sewer map and outfall information table and by submitting the GIS-compatible shapefile of the storm sewer map; and notifying any discovered interconnected MS4s.

BMP 3.2 Prohibit Non-Stormwater Discharges (Part 1 E 3 b)

Description: PWCS shall prohibit, through ordinance, policy, standard operating procedures, or other legal mechanism, to the extent allowable under federal, state, or local law, regulations, or ordinances, unauthorized non-stormwater discharges into the storm sewer system. Non-stormwater discharges or flows identified in 9VAC25-890-20 D 3 shall only be addressed if they are identified by PWCS as a significant contributor of pollutants discharging to the MS4. Flows that have been identified by the department as de minimis discharges are not significant sources of pollutants to surface water.

PWCS will prohibit non-stormwater discharges into the storm sewer system through Prince William County's enforcement of Chapter 23.2 Article 2 of the Prince William County Code of Ordinances. As a school system, PWCS does not have regulatory authority and must rely on Prince William County to develop and enforce ordinances. Therefore, the primary tool for preventing the discharge of non-stormwater discharges to the storm sewer system within Prince William County is Chapter 23.2 Article 2 of the Prince William County Code of Ordinances.

For effective prohibition of non-stormwater discharges from contractors operating on PWCS property, refer to BMP 6.4.

Necessary documentation for implementation: Chapter 23.2 Article 2 of the Prince William County Code of Ordinances

Responsible individual for implementation: PWCS Environmental Project Manager

Implementation schedule: PWCS will continue to identify any new or previously unidentified points of discharge from its MS4-regulated facilities. Downstream MS4s will be notified in writing of any known physical interconnection. PWCS will provide training on management and identification of potential illicit discharges to faculty and maintenance staff and report upstream illicit discharges to the applicable authorities.

Measurable goal: PWCS will monitor physical interconnections and notify downstream MS4s in writing if any new physical interconnections are identified. PWCS will submit copies of written notices as appendices to the annual report.

BMP 3.3 Implement Illicit Discharge Detection and Elimination Procedures (Part 1 E 3 c)

Description: PWCS shall maintain, implement, and enforce illicit discharge detection and elimination (IDDE) written procedures designed to detect, identify, and address unauthorized non-stormwater discharges, including illegal dumping, to the small MS4 to effectively eliminate the unauthorized discharge. Written procedures shall include:

- A description of the legal authorities, policies, standard operating procedures or other legal mechanisms available to PWCS to eliminate identified sources of ongoing illicit discharges including procedures for using legal enforcement authorities.
- Dry weather field screening protocols to detect, identify, and eliminate illicit discharges to the MS4. The protocol shall include:
 - A prioritized schedule of field screening activities and rationale for prioritization determined by PWCS based on such criteria as age of the infrastructure, land use, historical illegal discharges, dumping or cross connections;
 - If the total number of MS4 outfalls is equal to or less than 50, a schedule to screen all outfalls annually;
 - If the total number of MS4 outfalls is greater than 50, a schedule to screen a minimum of 50 outfalls annually such that no more than 50% are screened in the previous 12-month period. The 50% criteria is not applicable if all outfalls have been screened in the previous three years; and
 - A mechanism to track the following information:
 - The unique outfall identifier;
 - Time since the last precipitation event;
 - The estimated quantity of the last precipitation event;
 - Site descriptions (e.g., conveyance type and dominant watershed land uses);
 - Whether or not a discharge was observed; and
 - If a discharge was observed, the estimated discharge rate (e.g., width and depth of discharge flow rate) and visual characteristics of the discharge (e.g., odor, color, clarity, floatables, deposits or stains, vegetation condition, structural condition, and biology).
- A timeframe upon which to conduct an investigation to identify and locate the source of any observed unauthorized non-stormwater discharge. Priority of investigations shall be given to discharges of sanitary sewage and those believed to be a risk to human health and public safety. Discharges authorized under a separate VPDES or state permit require no further action under this permit.
- Methodologies to determine the source of all illicit discharges. If PWCS is unable to identify the source of an illicit discharge within six months of beginning the investigation, then PWCS shall document that the source remains unidentified. If the observed discharge is intermittent, PWCS shall document that attempts to observe the discharge flowing were unsuccessful.
- Methodologies for conducting a follow-up investigation for illicit discharges that are continuous or that permittees expect to occur more frequently than a one-time discharge to verify that the discharge has been eliminated except as provided for in Part I E 3 c (4);

- A mechanism to track all illicit discharge investigations to document the following:
 - The dates that the illicit discharge was initially observed, reported, or both;
 - The results of the investigation, including the source, if identified;
 - Any follow-up to the investigation;
 - Resolution of the investigation; and
 - The date that the investigation was closed.

The IDDE procedures described in Part I E 3 c., the storm sewer map and outfall information table are incorporated into the MS4 Program plan by reference. The map shall be made available to the department within 14 days upon request.

Necessary documentation for implementation: (1) Illicit Discharge Detection and Elimination (IDDE) Manual; (2) Outfall information table; (3) Storm sewer map; (4) Outfall screening field forms; and (5) Findings and Follow Up Form.

Responsible individual for implementation: PWCS Environmental Project Manager

Implementation schedule: Annual outfall screening, as described in PWCS' IDDE Program Manual that includes the schedules, mechanisms, and procedures described in this BMP and the General Permit.

Measurable goals: Effectiveness will be determined by maintaining, implementing, and enforcing illicit discharge detection and elimination (IDDE) written procedures. PWCS will track and document illicit discharge enforcement actions in each Annual Report.

BMP 4.1 ESC Compliance for Land Disturbing Activities (Part 1 E 4)

Description: PWCS shall utilize its legal authority, such as ordinances, permits, orders, specific contract language, and interjurisdictional agreements, to address discharges entering the MS4 from regulated construction site stormwater runoff. PWCS controls construction site stormwater runoff as follows:

Erosion and Sediment Control Plan Approval: PWCS is not a Virginia Erosion and Sediment Control Program and relies on PWC for plan review. Any construction plan is required to comply with the following PWC criteria: (1) PWC Code of Ordinances Article I Chapter 25-14 – Erosion and Sediment Control and (2) PWC Design and Construction Standards Manual. Any construction project on PWCS properties is reviewed through formal meetings and inspections with Prince William County officials. The Prince William County Planning and Zoning office reviews all documents prior to construction.

Erosion and Sediment Control Inspections: PWCS conducts all construction inspections and relies upon supervisors, project managers, and VDEQ Certified Erosion and Sediment inspectors to perform erosion and sediment control inspections. PWCS staff have certificates of competence in accordance with 9VAC25-850-40 for its project managers and inspectors. PWCS staff conducts internal erosion and sediment control inspections as required and holds a contract with Wetland Studies and Solutions, Inc to conduct erosion and sediment control inspections at the following frequency: (a) During or immediately following initial installation of erosion and sediment controls; (b) At least once per every two-week period; (c) Within 48 hours following any runoff producing storm event; and (d) At the completion of the project prior to the release of any performance bond.

Erosion and Sediment Control Compliance and Enforcement: PWCS conducts inspections, identifies deficiencies and provides follow-up. Standards for these construction activities are provided through Prince William County Design and Construction Standards Manual (DCSM) and the Virginia Erosion and Sediment Control Handbook. However, PWCS lacks the legal mechanism to provide escalated enforcement procedures such as monetary citations. PWCS will coordinate any necessary legal proceedings through PWC.

Necessary documentation for implementation: (3) Construction Checklists; (4) Documentation of ESC Inspector Certifications; (5) Completed ESC Inspection Forms for each regulated project; and (6) Total number of inspections conducted, number of enforcement actions implemented, and the type of enforcement actions implemented.

Roles and responsible individual for implementation: PWCS Office of Facilities Services Director

Implementation schedule: The implementation of this BMP will be on-going with all regulated land disturbing activities within the jurisdiction.

Measurable goals: Effectiveness will be determined by the implementation of the procedures, review, inspection, and enforcement. A measurable component is the number of enforcement actions (notice to comply or stop-work orders).

BMP 5.1 Compliance to Post-Construction Stormwater Management Regulation (Part 1 E 5)

Description: PWCS shall address post-construction stormwater runoff that enters the MS4 from the following land disturbing activities by implementing a post-construction stormwater runoff management program as follows:

- A third party contractor or PWCS representative will develop an inspection and maintenance program in accordance with Part I E 5 b and conduct annual post construction inspections of all PWCS stormwater management facilities.

PWCS shall implement an inspection and maintenance program for those stormwater management facilities owned or operated by PWCS that discharges to the MS4 as follows:

- PWCS shall develop and maintain written inspection and maintenance procedures in order to ensure adequate long-term operation and maintenance of its stormwater management facilities;
- PWCS shall inspect stormwater management facilities owned or operated by PWCS no less than once per year. PWCS may choose to implement an alternative schedule to inspect these stormwater management facilities based on facility type and expected maintenance needs provided that the alternative schedule and rationale is included in the MS4 Program plan. The alternative inspection frequency shall be no less than once per five years; and
- If during the inspection of the stormwater management facility conducted in accordance with Part I E 5 b (2), it is determined that maintenance is required, PWCS shall conduct the maintenance in accordance with the written procedures developed under Part I E 5 b (1).
- PWCS is not aware of any private stormwater management facilities located on its MS4-regulated properties. If it becomes apparent that private facilities are present or if they are added, PWCS will develop written procedures for inspection, compliance, and enforcement to ensure maintenance is conducted to ensure long-term operation in accordance with approved design.

PWCS shall include in the MS4 Program Plan the following:

- Written inspection procedures and all associated documents utilized during inspection of stormwater management facilities owned or operated by PWCS;
- The roles and responsibilities of each of PWCS' departments, divisions, or subdivisions in implementing the post-construction stormwater runoff control program; and
- The stormwater management facility spreadsheet or database incorporated by reference and the location or webpage address where the spreadsheet or database can be reviewed.

PWCS will ensure post-construction stormwater management (SWM) criteria are met for all regulated land disturbing activities over 2,500 square feet through the PWC plan approval process in accordance with the PWCS Post-Construction Stormwater Manual. Approval from PWC will ensure the SWM plan has been prepared per the VSMP Regulations that, in part, require that stormwater runoff controls:

- are designed and installed in accordance with the appropriate water quality and water quantity design criteria as required in Part II (9VAC25-870-40 et seq.) of 9VAC25-870; and
- have an inspection and maintenance plan.

Implementation of this BMP will be accomplished through the verification of a PWC approved stormwater management plan by a PWC designated ESC and SWM signature authority prior to providing written approval that allows the start of the land disturbance.

PWCS will extract and retain a copy of SWM facility inspection and maintenance plans from the approved stormwater management plan for proposed stormwater management facilities to be used with the implementation of BMP 5.3.

PWCS will perform long-term operations and maintenance of all stormwater facilities on PWCS properties utilizing the inspection and maintenance plans obtained from implementation of BMP 5.1. PWCS will utilize BMP-specific inspection and maintenance instruction from the PWCS Post-Construction Stormwater Manual. Inspections will be performed either:

- As dictated on the schedule provided on the inspection and maintenance plans; or
- A minimum of once annually, whichever are the more frequent criteria.

Inspections will be performed using the best management practice (BMP) inspection and maintenance checklist, corresponding with the type of BMP, as provided in either the PWCS Post-Construction Stormwater Manual or the latest edition of the Virginia Stormwater Management Handbook. The checklists provide lists of potential issues and methods to address the issue. Necessary maintenance identified during inspections will be conducted in a timely manner or depending on the complexity of the maintenance which may result in an alternative schedule indicated on the SWM Facility Tracking Database.

Necessary documentation for implementation: (1) PWCS Post-Construction Stormwater Manual; (2) Virginia Stormwater Management Handbook; (3) PWC approved SWM Plans and Calculations; (5) SWM Facility Inspection and Maintenance Plans; (6) Inspection Forms; and (7) SWM Facility Tracking Database is included in as Appendix C and incorporated by reference in this Program Plan.

Responsible individual for implementation: PWCS Office of Facilities Services Director

Implementation schedule: The implementation of this BMP will be ongoing with all regulated land disturbing activities.

Measurable goal: Effectiveness will be measured by the implementation of the inspection and maintenance program on post-construction stormwater management facilities.

BMP 5.2 Stormwater Management Facility Tracking and Reporting (Part I E 5 d)

Description: PWCS shall maintain an electronic database or spreadsheet of all known PWCS-owned stormwater management facilities that discharge into the MS4. The database shall also include all BMPs implemented by PWCS to meet the Chesapeake Bay TMDL load reduction as required in Part II A. A database shall include the following information as applicable:

- The stormwater management facility or BMP type;
- The stormwater management facility or BMPs location as latitude and longitude;
- The acres treated by the stormwater management 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, PWCS shall use June 30, 2005;
- The 6th Order Hydrologic Unit Code in which the stormwater management facility is located;
- Whether the stormwater management facility or BMP is owned or operated by PWCS;
- Whether or not the stormwater management facility or BMP is part of PWCS' Chesapeake Bay TMDL action plan required in Part II A or local TMDL action plan required in Part II B, or both; and
- The date of PWCS' most recent inspection of the stormwater management facility or BMP.

The electronic database or spreadsheet shall be updated no later than 30 days after a new stormwater management facility is brought online, a new BMP is implemented to meet a TMDL load reduction as required in Part II or discovered if it is an existing stormwater management facility.

PWCS shall use the DEQ Construction Stormwater Database or other application as specified by the department to report each stormwater management facility installed after July 1, 2014, to address the control of post-construction runoff from land disturbing activities for which PWCS is required to obtain a General VPDES Permit for Discharges of Stormwater from Construction Activities.

No later than October 1 of each year, PWCS shall electronically report the stormwater management facilities and BMPs implemented between July 1 and June 30 of each year using the DEQ BMP Warehouse and associated reporting template for any practices not reported in accordance with Part I E 5 f including stormwater management facilities installed to control post-development stormwater runoff from land disturbing activities less than one acre in accordance with the Chesapeake Bay Preservation Act regulations (9VAC25-830) and for which a General VPDES Permit for Discharges of Stormwater from Construction Activities was not required.

Necessary documentation for implementation: (1) SWM Facility Tracking Database in Appendix C and incorporated by reference in this Program Plan.

Responsible individual for implementation: PWCS Environmental Project Manager

Implementation schedule: The implementation of this BMP will be ongoing as inspections are performed as specified for each BMP in the SWM Facility Tracking Database.

Measurable goal: Effectiveness will be measured by the completeness of the annually reported database by October 1 each year.

BMP 6.1 Pollution Prevention Procedures for Operations & Maintenance Activities (Part 1 E 6)

Description: PWCS shall maintain and implement written procedures for those activities at facilities owned or operated by PWCS, such as road, street, and parking lot maintenance; equipment maintenance; and the application, storage, transport, and disposal of pesticides, herbicides, and fertilizers designed to:

- Prevent illicit discharges;
- Ensure the proper disposal of waste materials, including landscape wastes;
- Prevent the discharge of wastewater or permittee vehicle wash water or both into the MS4 without authorization under a separate VPDES permit;
- Require implementation of best management practices 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.

Necessary documentation for implementation: (1) PWCS Good Housekeeping/Pollution Prevention Program Manual; (2) PWCS High-Priority SWPPPs; (3) Training documentation; (4) Completed Comprehensive Evaluation forms.

Responsible individual for implementation: PWCS Environmental Project Manager

Objectives and expected results in meeting measurable goals: The objective is to minimize or prevent pollutant discharges from operations and maintenance activities. The expected result is staff adherence to the PWCS Good Housekeeping/Pollution Prevention Manual during daily activities.

Implementation schedule: Training will be provided at least once every 24 months, and SWPPP evaluations will be performed with the schedule described in BMP 6.2. No later than June 30 of each year, PWCS will annually review any high-priority facility owned or operated by PWCS for which a SWPPP has not been developed to determine if the facility has a high potential to discharge potential pollutants. If the facility is determined to be a high priority facility with a high potential to discharge pollutants, PWCS will develop a SWPPP no later than December 31 of that same year.

Measurable goals: Effectiveness will be measured by the implementation of a Facility-specific Stormwater Pollution Prevention Plan (SWPPP) as described in BMP 6.2, evaluated with a Facility compliance evaluation as described for the measure of effectiveness for BMP 3.4, and the Pollution Prevention training described in BMP 6.3.

BMP 6.2 Stormwater Pollution Prevention Plans (Part 1 E 6 c)

Description: PWCS shall identify which of the high-priority facilities have a high potential of discharging pollutants. PWCS shall maintain and implement a site-specific stormwater pollution prevention plan (SWPPP) for each facility identified. High priority facilities that have a high potential for discharging pollutants are those facilities that are not covered under a separate VPDES permit and which any of the following materials or activities occur and are expected to have exposure to stormwater resulting from rain, snow, snowmelt or runoff:

- Areas where residuals from using, storing or cleaning machinery or equipment remain and are exposed to stormwater;
- Materials or residuals on the ground or in stormwater inlets from spills or leaks;
- Material handling equipment;
- Materials or products that would be expected to be mobilized in stormwater runoff during loading or unloading or transporting activities (e.g., rock, salt, fill dirt);
- Materials or products stored outdoors (except final products intended for outside use where exposure to stormwater does not result in the discharge of pollutants);
- Materials or products that would be expected to be mobilized in stormwater runoff contained in open, deteriorated or leaking storage drums, barrels, tanks, and similar containers;
- Waste material except waste in covered, nonleaking containers (e.g., dumpsters);
- Application or disposal of process wastewater (unless otherwise permitted); or
- Particulate matter or visible deposits of residuals from roof stacks, vents or both not otherwise regulated (i.e., under an air quality control permit) and evident in the stormwater runoff.

Each SWPPP as required in Part I E 6 c shall include the following:

- A site description that includes a site map identifying all outfalls, direction of stormwater flows, existing source controls, and receiving water bodies;
- A description and checklist of the potential pollutants and pollutant sources;
- A description of all potential non-stormwater discharges;
- Written procedures designed to reduce and prevent pollutant discharge;
- A description of the applicable training as required in Part I E 6 m;
- Procedures to conduct an annual comprehensive site evaluation;
- An inspection frequency of no less than once per year and maintenance requirements for site specific source controls. The date of each inspection and associated findings and follow-up shall be logged in each SWPPP; and
- A log of each unauthorized discharge, release, or spill incident reported in accordance with Part III G including the following information:
 - Date of incident;
 - Material discharged, released, or spilled; and
 - Estimated quantity discharged, released or spilled.

No later than June 30 of each year, PWCS shall annually review any high-priority facility owned or operated by the PWCS for which a SWPPP has not been developed to determine if the facility has a high potential

to discharge pollutants as described in Part I E 6 c. If the facility is determined to be a high-priority facility with a high potential to discharge pollutants, PWCS shall develop a SWPPP meeting the requirements of Part I E 6 d no later than December 31 of that same year.

PWCS shall review the contents of any site-specific SWPPP no later than 30 days after any unauthorized discharge, release, or spill reported in accordance with Part III G to determine if additional measures are necessary to prevent future unauthorized discharges, releases, or spills. If necessary, the SWPPP shall be updated no later than 90 days after the unauthorized discharge.

The SWPPP shall be kept at the high-priority facility with a high potential to discharge and utilized as part of staff training required in Part I E 6 m. The SWPPP and associated documents may be maintained as a hard copy or electronically as long as the documents are available to employees at the applicable site.

If activities change at a facility such that the facility no longer meets the criteria of a high-priority facility with a high potential to discharge pollutants as described in Part I E 6 c, PWCS may remove the facility from the list of high-priority facilities with a high potential to discharge pollutants.

PWCS will not apply any deicing agent containing urea or other forms of nitrogen or phosphorus to parking lots, roadways, and sidewalks, or other paved surfaces in accordance with Part I E 6 k. The ingredients of deicers used will be maintained.

The SWPPP will provide instruction for updates, as necessary, to reflect changes on properties, modifications to operations and maintenance procedures, or shortcomings resulting in a reportable spill. Inspection forms will be completed in accordance with the prescribed schedule within the SWPPP and maintained on file with the Facilities Services Director.

PWCS shall provide a list of all high-priority facilities owned or operated by PWCS required in accordance with Part I E 6 c, and whether or not the facility has a high potential to discharge.

Table 7: List of High Priority Facilities	
High Priority Facility	Address
Central Transportation	14855 Dumfries Road Manassas, VA 20112
Gar-Field Transportation	14000 Smoketown Road Woodbridge, VA 22192
Hylton Automotive	14051 Spriggs Road Woodbridge, VA 22193
Hylton Transportation	14051 Spriggs Road Woodbridge, VA 22193
Brentsville Transportation	12153 Hooe Road Bristow, VA 20136
McCuin Transportation	7900 Piney Branch Lane Bristow, VA 20136
Independent Hill Complex	14800 Joplin Road Manassas, VA 20012
Potomac Transportation	3501 Panther Pride Drive Dumfries, VA 22026
Osborn Park Auto Shop	8909 Euclid Avenue Manassas, VA 20111
Western Bus Facility	5728 Wellington Rd Gainesville, VA 20155
Woodbridge Transportation	3001 Old Bridge Road Woodbridge, VA 22191

Necessary documentation for implementation: (1) Good Housekeeping & Pollution Prevention Manual; (2) SWPPPs; and (3) Annual comprehensive site evaluation forms.

Responsible individual for implementation: PWCS Environmental Project Manager

Implementation schedule: By June 30th every year PWCS will review its properties to determine if the facilities meet the criteria of a high priority facility and develop a SWPPP by December 31 of the same permit year. PWCS will also review its properties to determine if the properties no longer meet the criteria of a high priority facility. PWCS will review the Facility SWPPPs no later than 30 days after an unauthorized discharge, release or spill reported in accordance with Part III G to determine if additional measures are necessary to prevent future unauthorized discharges, releases or spills. The SWPPP shall be updated no later than 90 days after the unauthorized discharge. The annual comprehensive site evaluation will be completed once per year.

Measurable goals: Effectiveness will be measured by the completed annual comprehensive site evaluation once per year; a review of the SWPPP within 30 days after an unauthorized discharge, release or spill reported; and an update to the SWPPP within 90 days after an unauthorized discharge. In addition, effectiveness will be measured by the review of PWCS' properties to determine if the properties meet the criteria of a high priority facility and a SWPPP is developed, or no longer meet the criteria of a high priority facility.

BMP 6.3 Turf and Landscape Management (Part I E 6 j)

Description: PWCS applies nutrients to lands regulated under § 10.1-104.4 of the Code of Virginia; and therefore, shall continue to implement turf and landscape nutrient management plans in accordance with this statutory requirement.

PWCS shall implement a Department of Conservation and Recreation (DCR) approved and campus-specific Nutrient Management Plan (NMP) prepared by a Certified Nutrient Management Planner. Fertilizer application records will be maintained with each application using the application record provided in the NMP.

PWCS shall provide a list of lands for which turf and landscape nutrient management plans are required in accordance with Part I E 6 i and j, including the following information:

- The total acreage on which nutrients are applied;
- The date of the most recently approved nutrient management plan for the property; and
- The location in which the individual turf and landscape nutrient management plan is located.

Table 8: List of Lands where Nutrient Management Plans are Required			
Property Name	Management Area Location	NMP Expiration Date	Application Area (ac.)
Alvey E.S.	5300 Waverly Farm Dr. Haymarket, Va 20169	1/1/24	6.7
Antietam E.S.	12000 Antietam Rd. Woodbridge, Va 22192	2/25/24	3.0
Ashland E.S.	15300 Bowmans Folly Dr. Manassas, Va 20112	1/1/24	2.75
Battlefield H.S.	15000 Graduation Dr. Haymarket, Va 20169	6/2/24	9.91
Bel Air E.S.	14151 Ferndale Rd. Woodbridge, Va 22193	1/1/24	2.0
Belmont E.S.	751 Norwood Ln. Woodbridge, Va 22191	1/1/24	3.5
Bennett E.S.	8800 Old Dominion Dr. Manassas, Va 20110	1/1/24	5.0
Benton M.S.	7411 Hoadly Rd. Manassas, Va 20112	1/1/24	10.50
Beville M.S.	4901 Dale Blvd. Woodbridge, Va 22193	2/22/25	7.25
Brentsville H.S.	12109 Aden Rd. Nokesville, Va 20181	5/4/25	6.2
Bristow Run E.S.	8990 Worthington Dr. Bristow, Va 20136	8/2/25	4.6
Buckland E.S.	10511 Wharfdale Pl. Gainesville, Va 20155	10/11/24	2.2
Bull Run M.S.	6308 Catharpin Rd. Gainesville, Va 20155	4/22/24	11.9

Cedar Point E.S.	12601 Braemar Pkwy. Bristow, Va 20136	10/11/24	3.0
Chris Yung E.S.	12612 Fog Light Way Bristow, Va 20136	1/15/25	3.5
Coles E.S.	7405 Hoadly Rd. Manassas, Va 20112	1/1/24	2.0
Dale City E.S.	14450 Brook Dr. Woodbridge, Va 22193	1/1/24	1.0
Dumfries E.S.	3990 Cameron St. Dumfries, Va 22026	1/1/24	2.5
Ellis E.S.	10400 Kim Graham Ln. Manassas, Va 20109	3/1/24	2.0
Enterprise E.S.	13900 Lindendale Rd Woodbridge, Va 22193	1/8/24	2.0
Featherstone E.S.	14805 Blackburn Rd. Woodbridge, Va 22191	7/27/24	.20
Fitzgerald E.S.	15500 Benita Fitzgerald Dr. Woodbridge, Va 22191	1/11/24	1.0
Forest Park H.S.	15721 Forest Park Dr. Woodbridge, Va 22193	7/25/24	7.39
Fred Lynn M.S.	1650 Prince William Pkwy. Woodbridge, Va 22191	4/28/24	8.8
Freedom H.S.	15201 Neabsco Mills Rd. Woodbridge, Va 22191	2/5/24	1.07
Gainesville M.S.	8001 Limestone Dr. Gainesville, Va 20155	3/8/25	7.55
Gar-Field H.S.	14000 Smoketown Rd. Woodbridge, Va 22192	7/27/24	8.07
Glenkirk E.S.	8584 Sedge Wren Dr. Gainesville, Va 20155	10/22/24	2.7
Hampton M.S.	14800 Darbydale Ave. Woodbridge, Va 22193	3/4/25	4.8
Graham Park M.S.	3613 Graham Park Rd. Triangle, Va 22172	2/13/24	8.5
Gravelly E.S.	4670 Waverly Farm Dr. Haymarket, Va 20169	5/13/25	3.0
Haymarket E.S.	15500 Learning Ln. Haymarket, Va 20169	2/1/25	1.75
Henderson E.S.	3799 Waterway Dr. Dumfries, Va 22025	3/27/24	4.03
Hylton H.S.	14051 Spriggs Rd. Woodbridge, Va 22193	4/3/24	4.5
Kerrydale E.S.	13199 Kerrydale Rd. Woodbridge, Va 22193	11/1/24	1.75
Kilby E.S.	1800 Horner Rd. Woodbridge, Va 22191	4/4/24	.40

King E.S.	13224 Nickleson Dr. Woodbridge, Va 22193	4/6/24	2..03
Kelly Leadership Center	14715 Bristow Rd. Manassas, Va 20112	5/5/25	5.61
Lake Ridge E.S.	11970 Hedges Run Dr. Woodbridge, Va 22192	12/5/24	.57
Lake Ridge M.S.	12350 Mohican Rd. Woodbridge, Va 22192	4/11/24	5.05
Leesylvania E.S.	15800 Neabsco Rd. Woodbridge, Va 22191	4/13/24	2.75
Loch Lomond E.S.	7900 Augusta Rd. Manassas, Va 20111	12/6/24	.26
Marshall E.S.	12505 Kahns Rd. Manassas, Va 20112	4/20/24	5.5
Marstellar M.S.	14000 Sudley Manor Dr. Bristow, Va 20136	3/7/25	8.65
Marumsc E.S.	14100 Page St. Woodbridge, Va 22191	12/7/24	.40
McAuliffe E.S.	13540 Princedale Dr. Woodbridge, Va 22193	12/13/24	3.6
Minnieville E.S.	13639 Greenwood Dr. Woodbridge, Va 22193	4/26/24	2.0
Montclair E.S.	4920 Tallowood Dr. Dumfries, Va 22025	5/1/24	3.1
Mountain View E.S.	5600 McLeod Way Haymarket, Va 20169	12/13/24	4.6
Mullen E.S.	8000 Rodes Dr. Manassas, Va 20109	12/18/24	3.8
Neabsco E.S.	3800 Cordell Ave. Woodbridge, Va 22193	5/16/24	5.5
Occoquan E.S.	12915 Occoquan Rd. Woodbridge, Va 22192	5/21/24	2.1
Old Bridge E.S.	3051 Old Bridge Rd. Woodbridge, Va 22192	5/25/24	2.9
Osborn Park H.S.	8909 Euclid Ave. Manassas, Va 20111	4/1/25	6.25
PACE West	14490 John Marshall Hwy. Gainesville, Va 20155	4/4/25	3.4
Parkside M.S.	8602 Mathis Ave. Manassas, Va 20110	3/8/25	6.25
Patriot H.S.	10504 Kettle Run Rd. Nokesville, Va 20181	5/29/24	5.6
Pattie E.S./Washington-Reid	16125 Dumfries Rd. Dumfries, Va 22025	12/19/24	3.2
Penn E.S.	12980 Queen Chapel Rd. Woodbridge, Va 22193	12/20/24	2.86

Pennington Traditional	9305 Stonewall Rd. Manassas, Va 20110	1/2/25	3.6
Piney Branch E.S.	8301 Linton Hall Rd. Bristow, Va 20136	1/3/25	1.7
Porter Traditional	15311 Forest Grove Dr. Woodbridge, Va 22191	5/29/24	2.0
Potomac H.S.	3401 Panther Pride Dr. Dumfries, Va 22026	6/28/24	3.5
Potomac M.S.	3130 Panther Pride Dr. Dumfries, Va 22026	4/11/25	7.08
Potomac View E.S.	14601 Lamar Rd. Woodbridge, Va 22191	10/1/24	.52
Reagan M.S.	15801 Tanning House Pl. Haymarket, Va 20169	3/13/25	8.7
Rippon M.S.	15101 Blackburn Rd. Woodbridge, Va 22191	6/13/24	6.0
River Oaks E.S.	16950 McGuffeys Trl. Woodbridge, Va 22191	6/15/24	2.5
Rockledge E.S.	2300 Mariner Ln. Woodbridge, Va 22192	3/18/25	.75
Rosa Parks E.S.	13446 Princedale Dr. Woodbridge, Va 22193	12/21/24	2.54
Saunders M.S.	13557 Spriggs Rd. Manassas, Va 20112	6/18/24	6.0
Signal Hill E.S.	9553 Birmingham Dr. Manassas, Va 20111	1/7/25	5.0
Sinclair E.S.	7801 Garner Dr. Manassas, Va 20109	1/9/25	3.75
Springwoods E.S.	3815 Marquis Pl. Woodbridge, Va 22192	6/20/24	1.01
Unity Reed H.S.	8820 Rixliew Ln. Manassas, Va 20109	6/22/24	5.8
Unity Braxton M.S.	10100 Lomond Dr. Manassas, Va 20109	7/5/24	8.5
Sudley E.S.	9744 Copeland Dr. Manassas, Va 20109	1/17/25	1.5
Swans Creek E.S.	17700 Wayside Dr. Southbridge, Va 22026	7/9/24	4.5
T. Clay Wood E.S.	10600 Kettle Run Rd. Nokesville, Va 20181	5/18/25	2.4
Triangle E.S.	3615 Lions Field Rd. Triangle, Va 22172	7/9/24	3.5
Tyler E.S.	14500 John Marshall Hwy. Gainesville, Va 20155	1/25/25	5.35
Vaughan E.S.	2200 York Dr. Woodbridge, Va 22191	2/5/25	1.30

West Gate E.S.	8031 Urbanna Rd. Manassas, Va 20109	2/7/25	2.0
West Ridge E.S.	12400 Knightsbridge Dr. Woodbridge, Va 22192	2/12/25	2.0
Williams E.S.	3100 Panther Pride Dr. Dumfries, Va 22026	2/19/25	1.25
Woodbridge M.S.	2201 York Dr. Woodbridge, Va 22191	7/17/24	6.2
Woodbridge H.S.	3001 Old Bridge Rd. Woodbridge, Va 22192	7/23/24	5.67
Yorkshire E.S.	7610 Old Centreville Rd.	7/24/24	2.0
Jenkins E.S.	4060 Prince William Parkway Woodbridge, Va 22192	8/15/23	4.05
The Nokesville School	12375 Aden Rd. Nokesville, Va 20181	8/24/23	2.42
Victory E.S.	12001 Tygaart Lake Drive. Bristow, Va 20136	8/27/23	5.07
Gainesville H.S.	13150 University Blvd. Gainesville, Va 20155	4/7/25	5.34
Potomac Shores M.S.	17851 Woods View Dr. Dumfries, Va. 22026	4/12/25	6.26
Colgan H.S.	13833 Dumfries Rd. Manassas, Va 20112	7/8/25	5.93
Independence Non-Traditional	14550 Aden Rd. Manassas, Va 20112	7/11/25	.10
Kyle Wilson E.S.	5710 Liberty Hill Ct. Woodbridge, Va 22193	7/12/25	1.85
Covington-Harper E.S.	2500 River Heritage Blvd. Dumfries, Va 22026	7/15/25	4.25

Necessary documentation for implementation: (1) PWCS Nutrient Management Plan; and (2) Completed Fertilizer Application Record.

Responsible individual for implementation: PWCS Environmental Project Manager

Implementation schedule: The NMP will continue to be updated and modified as needed. Fertilizer application records will be maintained with each application.

Measurable goals: Effectiveness will be measured by the implementation of the NMP through completion of the application record and periodic updates to the NMP to make necessary adjustments based on soil conditions.

BMP 6.4 Contractor Safeguards, Measures and Procedures (Part I E 6 I)

Description: PWCS shall require through the use of contract language, training, standard operating procedures, or other measures within the PWCS' legal authority that contractors employed by PWCS and engaging in activities with the potential to discharge pollutants use appropriate control measures to minimize the discharge of pollutants to the MS4.

PWCS will use contract language that requires contractors to use appropriate control measures and procedures for stormwater discharges, when applicable. Contract language will require contractors to address items identified during inspections within a time period appropriate to prevent the potential of non-stormwater discharges. The contract language will also allow the school to stop-work, address the problem, and recoup cost for the remedy from the contractor.

Contractors implementing the stormwater program shall obtain the appropriate certifications as required under the Virginia Stormwater Management Act (VSMA) and its attendant regulations.

Contract language described in this BMP is not intended for regulated land disturbing activity addressed with BMPs 4.1, 4.2, and 4.3.

Necessary documentation for implementation: (1) Good Housekeeping and Pollution Prevention Manual; and (2) Contract language.

Responsible individual for implementation: PWCS Environmental Project Manager

Implementation schedule: PWCS will incorporate language into contracts to ensure contractors engaging in activities with the potential to discharge pollutants use appropriate control measures to minimize the discharge of pollutants to the MS4.

Measurable goals: Effectiveness will be measured by all signed contracts executed with contract good housekeeping and pollution prevention language.

BMP 6.5 Contractor Certification for Pesticide Application (Part I E 6 m 4)

Description: Contractors hired by PWCS who apply pesticides and herbicides are trained or certified in accordance with the Virginia Pesticide Control Act (§ 3.2-3900 et seq. of the Code of Virginia). Certification by the Virginia Department of Agriculture and Consumer Services (VDACS) Pesticide and Herbicide Applicator program shall constitute compliance with this requirement.

Necessary documentation for implementation: (1) Contract language; and (2) Proof of certifications

Responsible individual for implementation: PWCS Environmental Project Manager

Implementation schedule: PWCS will continue to obtain proof of certifications from contractors applying pesticide and herbicide.

Measurable goal: Effectiveness will be measured by all signed contracts executed for pesticide and herbicide application maintain proof of certifications on file.

BMP 6.6 Employee Good Housekeeping/Pollution Prevention Training Plan (Part 1 E 6 m)

Description: PWCS shall develop a training plan in writing for applicable staff that ensures the following:

- Field personnel receive training in the recognition and reporting of illicit discharges no less than once per 24 months;
- Employees performing road, street, and parking lot maintenance receive training in pollution prevention and good housekeeping associated with those activities no less than once per 24 months;
- Employees working in and around maintenance, public works, or recreational facilities receive training in good housekeeping and pollution prevention practices associated with those facilities no less than once per 24 months;
- Employees who apply pesticides and herbicides are trained or certified in accordance with the Virginia Pesticide Control Act (§ 3.2-3900 et seq. of the Code of Virginia). Certification by the Virginia Department of Agriculture and Consumer Services (VCACS) Pesticide and Herbicide Applicator program shall constitute compliance with this requirement;
- Employees serving as plan reviewers, inspectors, program administrators, and construction site operators obtain the appropriate certifications as required under the Virginia Erosion and Sediment Control Law and its attendant regulations;
- Employees and contractors implementing the stormwater program obtain the appropriate certifications as required under the Virginia Stormwater Management Act and its attendant regulations; and
- Employees whose duties include emergency response have been trained in spill response. Training of emergency responders such as firefighters and law-enforcement officers on the handling of spill releases as part of a larger emergency response training shall satisfy this training requirement and be documented in the training plan.

PWCS shall maintain documentation of each training event conducted by the permittee to fulfill the requirements of Part I E 6 m for a minimum of three years after the training event. The documentation shall include the following information:

- The date of the training event;
- The number of employees attending the training event; and
- The objective of the training event.

PWCS may fulfill the training requirements in Part I E 6 m, in total or in part, through regional training programs involving two or more MS4 permittees; however, PWCS shall remain responsible for ensuring compliance with the training requirements.

PWCS will incorporate a written training plan into its Good Housekeeping/Pollution Prevention and IDDE Program Manuals, including a schedule of training events. The Program Manuals will serve as the training material and include Appendices to document training and list relevant staff for the following specific training:

- Training at least once every 24 months to relevant field personnel in the recognition and reporting of illicit discharges. Training will utilize the IDDE Manual described in BMP 3.3.

- Training once every 24 months to relevant employees in good housekeeping and pollution prevention practices that are to be employed during road and parking lot maintenance and around maintenance and operations facilities. Training will utilize the PWCS Good Housekeeping/Pollution Prevention Manual described in BMP 6.1.

The plan will also require the following:

- Training or certification in spill response for emergency response employees.
- Training or certification for applying pesticides and herbicides in accordance with the Virginia Pesticide Control Act (§ 3.1-249.27 et seq. of the Code of Virginia) for employees performing applications.

Training required by the General Permit that is not applicable to PWCS includes the following:

- Training to employees in and around recreational facilities.
- Certifications as required under the Virginia Erosion & Sediment Control Law (See BMPs 4.1 and 4.3).
- Certifications as required under the Virginia Stormwater Management Act and its attendant regulations.

Necessary documentation for implementation: (1) Training documentation or appropriate certifications for employees; (2) PWCS IDDE Manual; and (3) PWCS Good Housekeeping/Pollution Prevention Program Manual.

Responsible individual for implementation: PWCS Environmental Project Manager

Implementation schedule: Training for illicit discharge and good housekeeping will occur no less than every 24 months. Certifications will be maintained, and proof of certification updated as appropriate.

Measurable goals: Effectiveness will be determined by the training occurring no less than every 24 months, and proof of certifications updated as appropriate.

3.1 SPECIAL CONDITIONS FOR THE CHESAPEAKE BAY TMDL

BMP CB-SC.1 Chesapeake Bay TMDL Action Plan (Part II A)

Description: PWCS will develop a second phase 2023-2028 Chesapeake Bay TMDL Action Plan that incorporates public comment and includes:

- Any new or modified legal authorities, such as ordinances, permits, policy, specific contract language, orders, and interjurisdictional agreements, implemented or needing to be implemented;
- The load and cumulative reduction calculations for each river basin;
- The total reductions achieved as of July 1, 2018, for each pollutant of concern in each river basin;
- A list of BMPs implemented prior to July 1, 2018, to achieve reductions associated with the Chesapeake Bay TMDL including the date of implementation and the reductions achieved;
- The BMPs to be implemented by PWCS prior to the expiration of this permit to meet the cumulative reductions, including as applicable:
 - Type of BMP;
 - Project name;
 - Location;
 - Percent removal efficiency for each pollutant of concern; and
 - Calculation of the reduction expected to be achieved by the BMP calculated and reported in accordance with the methodologies established for each pollutant of concern.
- A summary of any comments received as a result of public participation, PWCS' response, and any revisions made to the 2023-2028 Chesapeake Bay TMDL action plan as a result of public participation.

The Action Plan development considered DEQ's Chesapeake Bay Action Plan Guidance Memo No. 15-2005 and was revised in accordance with Guidance Memo No. 20-2003.

Prior to submittal of the action plan required in Part II A 11, PWCS shall provide an opportunity for public comment on the additional BMPs proposed to meet the reductions not previously approved by the department in the first phase Chesapeake Bay TMDL action plan for no less than 15 days.

Necessary documentation for implementation: (1) 2023-2028 Chesapeake Bay TMDL Action Plan; (2) Summary of public comments and PWCS' responses; and (3) PWCS Program Plan Updates, as necessary.

Responsible individual for implementation: PWCS Environmental Project Manager

Implementation schedule: The 2018 - 2023 Chesapeake Bay Action Plan was developed by November 1, 2019. The 2023-2028 Chesapeake Bay TMDL Action Plan is under development. The schedule developed in the Action Plan will be implemented thereafter.

Measurable goal: Effectiveness will be determined by the consideration of public comments; and the selection of cost effective BMPs supported by model quantification to achieve the required pollutant reductions.

BMP CB-SC.2 Chesapeake Bay TMDL Action Plan Implementation (Part II A)

Description: PWCS will implement the second phase 2023-2028 Chesapeake Bay TMDL Action Plan per a schedule developed in the 2023-2028 Chesapeake Bay TMDL Action Plan.

Necessary documentation for implementation: 2023-2028 Chesapeake Bay TMDL Action Plan

Responsible individual for implementation: PWCS Environmental Project Manager

Implementation schedule: Table 9 includes the implementation schedule in the 2023-2028 Chesapeake Bay TMDL Action Plan.

Table 9: 2023-2028 Chesapeake Bay TMDL Action Plan Implementation Schedule			
Step	General Description	Measurable Goal	Status
1	Update Chesapeake Bay TMDL Action Plan to demonstrate 40% reduction.	Complete Update	Ongoing

Measurable goal: Effectiveness will be determined by the implementation of the action in the schedule.

3.2 SPECIAL CONDITIONS FOR LOCAL TMDLS

Description: PWCS shall update and implement a local TMDL action plan designed to reduce loadings for pollutants of concern if PWCS discharges the pollutants of concern to an impaired water for which a TMDL has been approved by the U.S. Environmental Protection Agency (EPA) as described below:

- For TMDLs approved by the EPA prior to July 1, 2013, and in which an individual or aggregate wasteload has been allocated to PWCS, PWCS shall update the previously approved local TMDL action plans to meet the conditions of Part II B 3, B 4, B 5, B 6, and B 7 as applicable, no later than 18 months after the permit effective date and continue implementation of the action plan.

PWCS shall complete implementation of the TMDL action plans as soon as practicable. TMDL action plans may be implemented in multiple phases over more than one permit cycle using the adaptive iterative approach provided adequate progress is achieved in the implementation of BMPs designed to reduce pollutant discharges in a manner that is consistent with the assumptions and requirements of the applicable TMDL.

Each local TMDL action plan developed by PWCS shall include the following:

- The TMDL project name;
- The EPA approval date of the TMDL;
- The wasteload allocated to PWCS (individually or in aggregate), and the corresponding percent reduction, if applicable;
- Identification of the significant sources of the pollutants of concern discharging to the MS4 and that are not covered under a separate VPDES permit. For the purposes of this requirement, a significant source of pollutants means a discharge where the expected pollutant loading is greater than the average pollutant loading for the land use identified in the TMDL;
- The BMPs designed to reduce the pollutants of concern in accordance with Parts II B 4, B 5, and B 6;
- Any calculations required in accordance with Part II B 4, B 5, or B 6;
- For action plans developed in accordance with Part II B 4 and B 5, an outreach strategy to enhance the public's education (including employees) on methods to eliminate and reduce discharges of the pollutants; and
- A schedule of anticipated actions planned for implementation during this permit term.

BMP SC1.1 Broad Run, Little Bull Run, Bull Run, Occoquan River Bacteria TMDL Action Plan (Part II B)

Bacteria TMDLs:

PWCS is not an approved VSMP authority; therefore, PWCS shall select at least one strategy listed in Table 10 below designed to reduce the load of bacteria to the MS4 relevant to sources of bacteria applicable within the MS4 regulated service area. Selection of the strategies shall correspond to sources identified in Part II B 3 d.

Table 10: Strategies for Bacteria Reduction Stormwater Control/Management Strategy	
Source	Strategies (provided as an example and not meant to be all inclusive or limiting)
Domestic pets (dogs and cats)	<p>Provide signage to pick up dog waste, providing pet waste bags and disposal containers.</p> <p>Adopt and enforce pet waste ordinances or policies, or leash laws or policies.</p> <p>Place dog parks away from environmentally sensitive areas.</p> <p>Maintain dog parks by removing disposed of pet waste bags and cleaning up other sources of bacteria.</p> <p>Protect riparian buffers and provide unmanicured vegetative buffers along streams to dissuade stream access.</p>
Urban wildlife	<p>Educate the public on how to reduce food sources accessible to urban wildlife (e.g., manage restaurant dumpsters and grease traps, residential garbage, feed pets indoors).</p> <p>Install storm drain inlet or outlet controls.</p> <p>Clean out storm drains to remove waste from wildlife.</p> <p>Implement and enforce urban trash management practices.</p> <p>Implement rooftop disconnection programs or site designs that minimize connections to reduce bacteria from rooftops</p> <p>Implement a program for removing animal carcasses from roadways and properly disposing of the same (either through proper storage or through transport to a licensed facility).</p>

<p>Illicit connections or illicit discharges to the MS4</p>	<p>Implement an enhanced dry weather screening and illicit discharge, detection, and elimination program beyond the requirements of Part I E 3 to identify and remove illicit connections and identify leaking sanitary sewer lines infiltrating to the MS4 and implement repairs.</p> <p>Implement a program to identify potentially failing septic systems.</p> <p>Educate the public on how to determine whether their septic system is failing.</p> <p>Implement septic tank inspection and maintenance program.</p> <p>Implement an educational program beyond any requirements in Part I E 1 though E 6 to explain to citizens why they should not dump materials into the MS4.</p>
<p>Dry weather urban flows (irrigations, car washing, powerwashing, etc.)</p>	<p>Implement public education programs to reduce dry weather flows from storm sewers related to lawn and park irrigation practices, car washing, powerwashing and other nonstormwater flows.</p> <p>Provide irrigation controller rebates.</p> <p>Implement and enforce ordinances or policies related to outdoor water waste.</p> <p>Inspect commercial trash areas, grease traps, washdown practices, and enforce corresponding ordinances or policies.</p>
<p>Birds (Canadian geese, gulls, pigeons, etc.)</p>	<p>Identify areas with high bird populations and evaluate deterrents, population controls, habitat modifications and other measures that may reduce bird-associated bacteria loading.</p> <p>Prohibit feeding of birds.</p>
<p>Other sources</p>	<p>Enhance maintenance of stormwater management facilities owned or operated by the permittee.</p> <p>Enhance requirements for third parties to maintain stormwater management facilities.</p> <p>Develop BMPs for locating, transporting, and maintaining portable toilets used on permittee-owned sites. Educate third parties that use portable toilets on BMPs for use.</p> <p>Provide public education on appropriate recreational vehicle dumping practices.</p>

Necessary documentation for implementation: Broad Run, Little Bull Run, Bull Run, Occoquan River Bacteria TMDL Action Plan

Responsible individual for implementation: PWCS Environmental Project Manager

Implementation schedule: See Table 11 for the implementation schedule.

Table 11: Bacteria TMDL Action Plan Summary of Actions			
Strategies	Method	Timeframe	Metric
Dumpster Inspection and Repairs	PWCS staff or contractors will inspect dumpster areas for potential issues, including illicit discharges. The inspection lids are closed and in good condition to prevent urban wildlife access/food sources. In addition, the inspection will ensure there are no leaking dumpsters to prevent non-stormwater discharges. Dumpsters will be repairs and/or replaced as necessary.	Completed and Ongoing	Number of Repairs and/or Replacements
Education and Outreach	Include information on how to reduce food sources accessible to urban wildlife in employee training.	June 30, 2023	Number of employees and training dates

Measurable goal: Effectiveness will be determined by the consideration of public comments; and the selection of cost effective BMPs and outreach strategies to enhance the public's education.

BMP SC1.2 Neabsco Creek Bacteria TMDL Action Plan Implementation (Part II B)

Description: PWCS will implement a strategy annually per the schedule in the Neabsco Creek Bacteria TMDL Action Plan.

Necessary documentation for implementation: Neabsco Creek Bacteria TMDL Action Plan

Responsible individual for implementation: PWCS Environmental Project Manager

Implementation schedule: The implementation of the Neabsco Creek Bacteria TMDL Action Plan will be according to schedule in Table 12.

Table 12: Bacteria TMDL Action Plan Summary of Actions			
Strategies	Method	Timeframe	Metric
Dumpster Inspection and Repairs	PWCS staff or contractors will inspect dumpster areas for potential issues, including illicit discharges. The inspection lids are closed and in good condition to prevent urban wildlife access/food sources. In addition, the inspection will ensure there are no leaking dumpsters to prevent non-stormwater discharges. Dumpsters will be repairs and/or replaced as necessary.	Completed and Ongoing	Number of Repairs and/or Replacements
Education and Outreach	Include information on how to reduce food sources accessible to urban wildlife in employee training.	June 30, 2023	Number of employees and training dates

Measurable goal: Effectiveness will be determined by the implementation of the actions in the schedule.

BMP SC1.3 Cedar Run and Licking Run Bacteria TMDL Action Plan Implementation (Part II B)

Description: PWCS will implement a strategy annually per the schedule in the Cedar Run and Licking Run Creek Bacteria TMDL Action Plan.

Necessary documentation for implementation: Cedar Run and Licking Run Bacteria TMDL Action Plan

Responsible individual for implementation: PWCS Environmental Project Manager

Implementation schedule: The implementation of the Cedar Run and Licking Run Bacteria TMDL Action Plan will be according to schedule in Table 13.

Table 13: Bacteria TMDL Action Plan Summary of Actions			
Strategies	Method	Timeframe	Metric
Dumpster Inspection and Repairs	PWCS staff or contractors will inspect dumpster areas for potential issues, including illicit discharges. The inspection lids are closed and in good condition to prevent urban wildlife access/food sources. In addition, the inspection will ensure there are no leaking dumpsters to prevent non-stormwater discharges. Dumpsters will be repairs and/or replaced as necessary.	Completed and Ongoing	Number of Repairs and/or Replacements
Education and Outreach	Include information on how to reduce food sources accessible to urban wildlife in employee training.	June 30, 2023	Number of employees and training dates

Measurable goal: Effectiveness will be determined by the implementation of the actions in the schedule.

BMP SC1.4 Potomac River Tributaries in Prince William County and Stafford Counties Bacteria TMDL Action Plan Implementation (Part II B)

Description: PWCS will implement a strategy annually per the schedule in the Potomac River Tributaries in Prince William County and Stafford Counties Bacteria TMDL Action Plan.

Necessary documentation for implementation: Potomac River Tributaries in Prince William County and Stafford Counties Bacteria TMDL Action Plan

Responsible individual for implementation: PWCS Environmental Project Manager

Implementation schedule: The implementation of the Potomac River Tributaries in Prince William County and Stafford Counties Bacteria TMDL Action Plan will be according to schedule in Table 14.

Table 14: Bacteria TMDL Action Plan Summary of Actions			
Strategies	Method	Timeframe	Metric
Dumpster Inspection and Repairs	PWCS staff or contractors will inspect dumpster areas for potential issues, including illicit discharges. The inspection lids are closed and in good condition to prevent urban wildlife access/food sources. In addition, the inspection will ensure there are no leaking dumpsters to prevent non-stormwater discharges. Dumpsters will be repairs and/or replaced as necessary.	Completed and Ongoing	Number of Repairs and/or Replacements
Education and Outreach	Include information on how to reduce food sources accessible to urban wildlife in employee training.	June 30, 2023	Number of employees and training dates

Measurable goal: Effectiveness will be determined by the implementation of the actions in the schedule.

BMP SC2.1 Bull Run Sediment TMDL Action Plan (Part II B)

Local sediment, phosphorous, and nitrogen TMDLs:

The permittee shall reduce the loads associated with sediment, phosphorus, or nitrogen through implementation of one or more of the following:

- One or more of the BMPs from the Virginia Stormwater BMP Clearinghouse listed in 9VAC25-870-65 or other approved BMPs found on the Virginia Stormwater BMP Clearinghouse website;
- One or more BMPs approved by the Chesapeake Bay Program; or
- Land disturbance thresholds lower than Virginia's regulatory requirements for ESC and post-development SWM.

The permittee may meet the local TMDL requirements for sediment, phosphorus, or nitrogen through BMPs implemented to meet the requirements of the Chesapeake Bay TMDL in Part II A as long as the BMPs are implemented in the watershed for which local water quality is impaired. The permittee shall calculate the anticipated load reduction achieved from each BMP and include the calculations in the action plan required in Part II B 3 f. No later than 36 months after the effective date of this permit, the permittee shall submit to the department the anticipated end dates by which the permittee will meet each WLA for sediment, phosphorus, or nitrogen. The proposed end date may be developed in accordance with Part II B 2.

Street Sweeping

The mass loading approach was used until June 30, 2022, and future sediment reduction calculations, if necessary, for street sweeping will be updated in the following Action Plan from previous Action Plan submittals to match the guidelines in the *Recommendations of the Expert Panel to Define Removal Rates for Street and Storm Drain Cleaning Practices* final report approved by the CBP dated May 19, 2016 (referred to here as the Expert Panel Report). The Expert Panel Report recommended phasing out the previous methods of calculating sediment reduction from street sweeping in favor of the lane-mile based approach reflected in Table 15.

In lieu of the mass loading approach to quantify reductions, PWCS may use the lane mile approach from the 2016 Expert Panel Report. Additional evaluation is needed to determine the most effective methods to meet the required sediment reduction (162.32 tons/year or 324,640 lbs./year) for future sediment loads to achieve the WLA (see schedule in Table 16).

Table 15: Street Sweeping Using the Lane Mile Approach

PWCS TSS TMDL WLA Reduction Scenarios				
Street Cleaning Practices Available for Credit				Removal Rate
Practice	Description*	Passes/Yr.	TSS	
Advanced Sweeping Technology	SCP-1	2 passes per week	100	0.21
	SCP-2	1 pass per week	50	0.16
	SCP-3	1 pass per 2 weeks	25	0.11
	SCP-4	1 pass every 4 weeks	10	0.06
	SCP-5	1 pass every 8 weeks	6	0.04
	SCP-6	1 pass every 12 weeks	4	0.02
	SCP-7	Seasonal scenario 1 or 2	15	0.07
	SCP-8	Seasonal scenario 3 or 4	20	0.1
Mechanical Broom Technology	SCP-9	2 passes per week	100	0.01
	SCP-10	1 pass per week	50	0.005
	SCP-11	1 pass every 4 weeks	10	0.001

*Seasonal scenarios are defined as follows:

S1: Spring - One pass every week from March to April. Monthly otherwise.

S2: Spring – One pass every other week from March to April. Monthly otherwise.

S3: Spring and fall – One pass every week (March to April, October to November). Monthly otherwise.

S4: Spring and fall – One pass every other week during the season. Monthly otherwise.

Land Use Change

In 2016, Stonewall Middle School converted 4 acres of land use type pervious grass to land use type forest. Reductions are calculated using the reduction values found in Table V.H.1 of the 2015 VDEQ Chesapeake Bay Action Plan Guidance Document.

Retrofit BMPs

PWCS has installed BMPs at Pace West Special, Tyler ES, Sinclair ES, Sudley Elementary School, and West Gate Elementary School. Calculations for TSS load are completed using the Pollutant of Concern Load (Potomac) found in the Table 2b. Reductions are calculated using the appropriate methods in Table V.A.1 and Table V.C.1 of the 2015 Guidance Document.

Education and Outreach

PWCS incorporates education of the effects of human activity on water quality and how we as humans affect it into public science education courses at multiple grade levels. Through the Virginia Standards of Learning (SOLs), students learn the importance of protecting and maintaining our water resources and how it affects their watershed. PWCS implements all Virginia SOLs and specifically incorporates water quality issues into grade 4 and 6 earth science courses.

PWCS provides a Sewer Science Wastewater Laboratory class for high schools that introduce students to municipal wastewater treatment. Students learn where wastewater comes from and how it impacts the

environment if left untreated. Students learn to treat wastewater through these processes: primary sedimentation, biological treatment, secondary sedimentation, filtration, and disinfection.

PWCS offers the Enviroscope Program to Grades K-8 which addresses the SOLs for Science Grade 4 Section 9 (Earth Resources) a) watersheds and water resources, and SOLs for Science Grade 6 Section 5 (Matter) e) the importance of water for agriculture, power generation, and public health and f) the importance of protecting and maintaining water resources, Section 7 (Living Systems) f) major conservation, health, and safety issues associated with watersheds, and Section 9 (Earth Resources) a) management of renewable resources, b) management of nonrenewable resources, c) the mitigation of land- use and environmental hazards through preventive measures, and d) cost/benefit trades in conservation polices. This presentation to students includes discussion of wastewater treatment, water reclamation, watershed management, and water quality on public health.

PWCS also is involved with NOAA's B-WET program that takes students on a field trip to learn about watershed management and environmental protection. NOAA's B-WET Meaningful Watershed Educational Experience (MWEE) also includes discussion of groundwater protection and pollution prevention in their watershed.

Employee Training

Sediment impacts has been incorporated into annual employee training programs. Training addresses identification, risk factors, and significant sources within the PWCS system. PowerPoint presentations during annual training provide material about the TMDL and the WLA. Custodial staff, snow crews, and operations and maintenance staff receive specific training in the following concepts:

- The consequences of suspended sediment in local waters
- Sand/salt application rates
- Sand/salt storage conditions at individual schools and at storage facilities
- Erosion identification

Necessary documentation for implementation: (1) Bull Run Sediment TMDL Action Plan; (2) Program Plan Updates as necessary

Responsible individual for implementation: PWCS Environmental Project Manager

Implementation schedule: The implementation of the Bull Run Sediment TMDL Action Plan will be according to schedule in Table 16.

Table 16: Schedule for PWCS' Sediment TMDL Action Plan			
Step	General Description	Measurable Goal	Completion Date
1	Revise Action Plan to calculate appropriate sediment reduction requirements. Quantify existing BMP reductions from 2014 to 2019.	Quantify sediment reductions. Revise Action Plan to reflect actual required reductions.	October 1, 2022
2	Quantify sediment reductions for all BMPs installed after the Bull Run TMDL model simulation period.	Begin quantifying sediment reductions to take credit for BMPs installed from 2005 to 2014.	June 30, 2023
3	Evaluate additional reductions and schedule required to meet the WLA.	Finalize sediment reductions to take credit for BMPs installed from 2005 to 2014.	June 30, 2024
4	Develop a plan for implementing additional BMPs as necessary. Begin to coordinate with Prince William County and VDOT on credit partnerships to determine if a partnership is feasible. If Street Sweeping is proposed, the lane mile approach will be utilized.	Evaluate additional BMPs.	June 30, 2025
5	Evaluate Street Sweeping program if necessary. Develop documentation. Begin to develop planning documents for additional BMP implementation. This includes any necessary documentation for funding sources.	Develop appropriate documentation.	June 30, 2026
6	Provide a phased approach for BMP implementation, which includes design and construction of BMPs necessary to meet the wasteload allocation.	Design and installation of BMPs.	June 30, 2027 to June 30, 2032

7	Target date to meet wasteload allocation.	Annual reporting of sediment reductions that meet the wasteload allocation.	June 30, 2033
---	---	---	---------------

Measurable goal: Effectiveness will be measured by the implementation of the TMDL Action Plan measurable goals outlined in Table 16.

BMP SC3.1 Tidal Potomac and Anacostia Rivers PCB TMDL Action Plan (Part II B)

Local Polychlorinated biphenyl (PCB TMDLs):

For each PCB TMDL action plan, the permittee shall include an inventory of potentially significant sources of PCBs owned or operated by the permittee that drains to the MS4 that includes the following information:

- (1) Location of the potential source;
- (2) Whether or not the potential source is from current site activities or activities previously conducted at the site that have been terminated (i.e. legacy activities); and
- (3) A description of any measures being implemented or to be implemented to prevent exposure to stormwater and discharge of PCBs from the site.

If at any time during the permit term, the permittee discovers a previously unidentified significant source of PCBs within the MS4 regulated service area, they shall notify DEQ in writing within 30 days of discovery.

Necessary documentation for implementation: (1) Tidal Potomac and Anacostia Rivers PCB TMDL Action Plan; (2) Program Plan Updates, as necessary.

Responsible individual for implementation: PWCS Environmental Project Manager

Implementation schedule: See Table 17 for the implementation schedule.

Table 17: Schedule of Anticipated Actions Planned for Implementation of PCB Reduction			
Strategies	Method	Timeframe	Metric
Identification of significant sources of PCBs	Assessment of PWCS Properties	Completed	SWPPP developed
Site-specific SWPPPs for PWCS properties with the potential to discharge PCBs	SWPPP developed, implemented and maintained for Facilities	Completed and ongoing	SWPPP inspections conducted annually
MS4 Program MCMs developed to address and minimize PCBs	MCMs 1 - 4 and 6 developed and implemented to specifically address and minimize PCBs	Completed and ongoing	Annual reporting
New discoveries previously unidentified significant sources of PCBs reported, if found	Notification to DEQ in writing within 30 days of discovery, if found	Ongoing	Letter, if applicable

Measurable goal: Effectiveness will be measured by the implementation of the TMDL Action Plan strategies and reporting on the metrics as outlined in Table 13.

Appendix A - BMP 3.1 Outfall Information Table (Incorporated By Reference)

Appendix B – Documentation of Written Notifications of Interconnected MS4s (Incorporated By Reference)

Appendix C - BMP 5.2 SWM Facility Tracking Database (Incorporated By Reference)