

NEABSCO CREEK BACTERIA TMDL ACTION PLAN

**A Plan to Address PWCS'
Assigned Wasteload Allocation
for Neabsco Creek TMDL**



Permit#: VAR040010
Prepared: September 2022

This document addresses Part II B of the General VPDES Permit for Discharges of Stormwater from Small Municipal Separate Storm Sewer Systems. This document serves as a PWCS-specific TMDL Action Plan to identify the best management practices and other interim milestone activities to be implemented to address the bacteria wasteload allocation assigned to PWCS' regulated MS4 area in the "Bacteria TMDL for Neabsco Creek Prince William County, Virginia" approved by the Environmental Protection Agency on July 10, 2008.

**Prince William County
Public Schools**

EXECUTIVE SUMMARY

Prince William County Schools (PWCS) is authorized to discharge stormwater from its municipal separate storm sewer system (MS4) under the Virginia Pollutant Discharge Elimination System (VPDES) General Permit for Discharge of Stormwater from Small MS4s (MS4 General Permit). To maintain permit compliance, PWCS implements an MS4 Program Plan that includes best management practices (BMPs) to address six minimum control measures (MCMs) and special conditions for the Total Maximum Daily Loads (TMDL) in which PWCS has been assigned a wasteload allocation (WLA). The Environmental Protection Agency (EPA) describes a TMDL as a “pollution diet” that identifies the maximum amount of a pollutant the waterway can receive and still meet water quality standards. A WLA determines the required reduction in pollutant of concern loadings from the MS4s to meet water quality standards. The MS4 General Permit serves as the regulatory mechanism for addressing the load reductions described in the TMDL, predominantly through the requirement of a TMDL Action Plan.

The purpose of this Action Plan is to address the WLA assigned to PWCS within the “Bacteria TMDL for Neabsco Creek Prince William County, Virginia,” approved by the EPA on July 10, 2008. The TMDL assigns PWCS a WLA for *Escherichia coli* (*E. coli*) equivalent to a 75% reduction in the existing conditions to meet water quality standards in Neabsco Creek. The expectation of the TMDL is for MS4 permittees, such as PWCS, to address the TMDL WLAs through the iterative implementation of programmatic BMPs. PWCS’ stormwater program BMPs are described in this TMDL Action Plan, specifically to their application to reductions in *E. coli* discharges to the MS4. The Action Plan addresses *E. coli* in accordance with the special conditions of the MS4 General Permit and expectations of the TMDL by demonstrating that the iterative implementation of programmatic BMPs to reduce or eliminate *E. coli* to the maximum extent practicable. Compliance to the special conditions is demonstrated through:

- ✓ Summary of BMPs already included in the PWCS Program Plan that address *E. coli*;
- ✓ PWCS’ MS4 Public Education and Outreach strategy and plan;
- ✓ An assessment of PWCS-owned and operated properties; and
- ✓ A methodology to measure Action Plan effectiveness through MS4 annual reporting.

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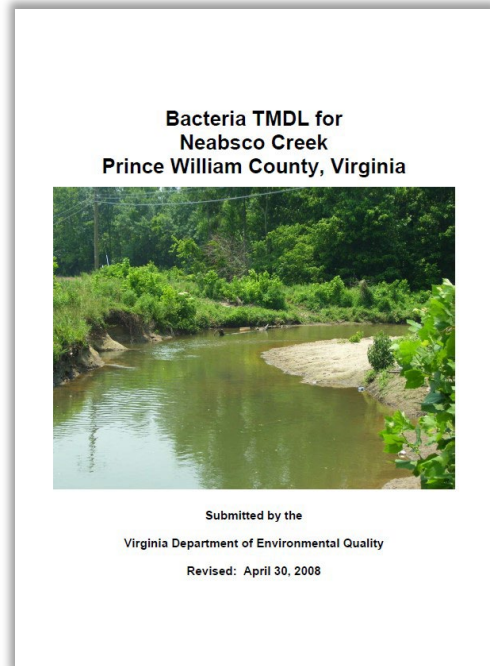
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Acronyms

BMP	Best Management Practice
DEQ	Department of Environmental Quality
EPA	Environmental Protection Agency
I&I	Inflow and Infiltration
IDDE	Illicit Discharge Detection and Elimination
LA	Load Allocation
MCM	Minimum Control Measure
MOS	Margin of Safety
MS4	Municipal Separate Storm Sewer System
NPDES	National Pollutant Discharge Elimination System
PWCS	Prince William County Schools
SWPPP	Stormwater Pollution Prevention Plan
SWM	Stormwater Management
TMDL	Total Maximum Daily Load
VSMP	Virginia Stormwater Management Program
WLA	Wasteload Allocation

1.0 Introduction and Purpose

Mandated by Congress under the Clean Water Act, the National Pollutant Discharge Elimination System (NPDES) storm water program includes the Municipal Separate Storm Sewer System (MS4), Construction, and Industrial General Permits. In Virginia the NPDES Program is administered by the Virginia Department of Environmental Quality (DEQ) through the Virginia Stormwater Management Program (VSMP) and the Virginia Pollutant Discharge Elimination System (VPDES). Prince William County Schools (PWCS) is authorized to discharge stormwater from its MS4 under the VPDES General Permit for Discharge of Stormwater from Small MS4s (MS4 General Permit). As part of the MS4 General Permit authorization, PWCS developed and implements a MS4 Program Plan with best management practices (BMPs) to address the six minimum control measures (MCMs) and the special conditions for applicable total maximum daily loads (TMDL), as outlined in the MS4 General Permit. Implementation of these BMPs is consistent with the provisions of an iterative MS4 Program constituting compliance with the standard of reducing pollutants to the "maximum extent practicable."



In 1998, DEQ listed segments of Neabsco Creek on their biennial 303(d) TMDL Priority List and Report due to violations of the state's water quality standard for fecal coliform bacteria, now expressed as *E. coli*. As a consequence, the "Bacteria TMDL for Neabsco Creek Prince William County, Virginia," were developed and approved by the Environmental Protection Agency (EPA) on July 10, 2008.

The TMDL assigned PWCS an aggregate wasteload allocation (WLA) for PWCS, Prince William County, VDOT – Northern Urban Area, and Northern Virginia Community College for *Escherichia coli* (*E. coli*) of $1.05E+12$ colony forming units per year (cfu/yr), representing a 75% reduction in the existing loads to meet water quality standards in Neabsco Creek from MS4. The WLA represents the allowable bacteria load from PWCS' MS4 to prevent instances of exceedance of bacteria discharge water quality standards. The expectation from PWCS to address the WLAs is through iterative implementation of programmatic BMPs. PWCS' programmatic BMPs applicable to the pollutant of concern are described herein and only failing to implement the BMPs would be considered a violation of the MS4 General Permit.

1.1 Total Maximum Daily Loads

A TMDL is the amount of pollutant a water body can assimilate and still meet water quality standards for its designated use. Typically, TMDLs are represented numerically in three main components:

- WLA for point source contributions and MS4 Permit operators
- Load Allocations (LA) for non-point source contributions and natural background sources
- Margin of Safety (MOS)

Point source pollution is any single identifiable source from which pollutants are discharged. If point source discharges, including a permitted MS4, are present in the TMDL watershed, then any allocations assigned to that permittee must be in the form of a WLA. PWCS' MS4 outfalls are defined as point source discharges and therefore fall under this category in the TMDL. Pollution that is not from an identifiable source, such as a pipe or a ditch, but rather originates from multiple sources over a relatively large area, are considered to be non-point source pollution. These sources are typically categorized into agricultural, livestock, and wildlife, with LAs assigned for each. The MOS is a required component that accounts for the modeling uncertainty in the response of the waterbody to loading reductions and is implicitly incorporated into a TMDL computation. The TMDL is expressed in the following equation:

$$\text{TMDL} = \sum \text{WLA} + \sum \text{LA} + \text{MOS}$$

The TMDL represents the sum of calculable sources plus a margin of safety that is required to not exceed the state water quality standard for recreation of a 30-day geometric mean of 126 cfu/100 ml and an instantaneous water quality standard of 235 cfu/100 ml. The cfu/ml unit represents a volumetric concentration of viable bacteria cells that can multiply under controlled conditions.

1.2 TMDL Special Conditions

PWCS operates its regulated MS4 within the Neabsco Creek bacteria TMDL watershed and is therefore subject to the TMDL WLAs assigned in the TMDL. The special conditions for the TMDL listed in the MS4 General Permit require PWCS to develop a TMDL Action Plan designed to reduce loadings for pollutants of concern where PWCS is given a WLA to an impaired water for which a TMDL has been approved by the 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; and

- For TMDLs approved by EPA on or after July 1, 2013, and prior to June 30, 2018, and in which an individual or aggregate wasteload has been allocated to PWCS, PWCS shall develop and initiate implementation of action plans to meet the conditions of Part II B 3, B 4, B 5, B 6, and B 7 as applicable for each pollutant for which wasteloads have been allocated to PWCS' MS4 no later than 30 months after the permit effective date.

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 PWCS' 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.

1.3 PWCS' Neabsco Creek TMDL Action Plan

The purpose of PWCS' Action Plan for Neabsco Creek bacteria TMDL is to address each of the Local TMDL special conditions listed in Part II B. As an adaptive and iterative approach to meet surface water quality goals, the Action Plan may be revised from time to time to reduce *E. coli* discharges from PWCS' MS4 to the maximum extent practicable. The Action Plan is incorporated, by reference, into PWCS' MS4 Program Plan, which outlines the BMPs that address the entirety of the conditions set forth in the MS4 General Permit.

2.0 Neabsco Creek Bacteria TMDL

The impaired segment extends from the confluence of Neabsco Creek with an unnamed tributary to Neabsco Creek, near Dale City and approximately 0.4 river miles downstream from Route 784 (on the tributary), downstream to the end of the free-flowing portion of Neabsco Creek at the Route 1 bridge crossing. The impaired segment is 8.42 miles in length. The drainage area of the impaired portion of the Neabsco Creek watershed is approximately 15.6 square miles. MS4-regulated PWCS properties in Prince William County discharge into the Neabsco Creek [PL49 HUC] watershed. The bacterial impairment is due to bacterial violations to water quality standards for *E. coli*. The “*Bacteria TMDL for Neabsco Creek Prince William County, Virginia*” assigns a WLA for *E. coli*. These particular bacteria are typically found in the lower intestines of warm-blooded organisms. Certain strains of the bacteria can be harmful and can survive for a limited amount of time outside of a host. Fecal contamination from these organisms, if ingested by another host, can cause serious poisoning. A WLA was calculated for existing point sources, including MS4 permit operators, along with LAs and the MOS to meet the water quality standard and reduce the risk of waterborne illness. The TMDL was established based on scenarios where no violations of either the *E. coli* geometric mean standard or the instantaneous *E. coli* standard would occur. The selected TMDL scenario for establishing WLAs included reductions from sources as shown in Table 1.

2.1 Wasteload Allocation

The TMDL considered potential sources of *E. coli* bacteria from the sources identified in Table 1:

Table 1: Load Reduction Required to Meet *E. coli* Standards

<i>Neabsco Creek (A26R-02-BAC)</i>			
Humans	Livestock	Pets	Wildlife
0%	75%	75%	75%

Sources identified in Table 1 can be summarized as the following:

- Humans – Human sources can come from straight pipes, failing septic systems, and land applied biosolids.
- Livestock – Livestock inventory within the TMDL watershed consists of cows, hogs & pigs, sheep & lambs, and horses & ponies. Whereas indirect wildlife sources are those that are carried to the stream from the surrounding land via rain and runoff events, direct sources are those that are directly deposited into the stream.
- Pets – This category includes MS4s as the nonpoint source runoff that ultimately discharges through the MS4. *E. coli* sources incorporated into the TMDL within the urban area include pet waste, primarily cats and dogs.
- Wildlife – Potential sources of bacteria include run-off from wildlife sources.

The TMDL assigned PWCS an aggregate WLA for PWCS, Prince William County, VDOT – Northern Urban Area, and Northern Virginia Community College for *E. coli* of $1.05E+12$ cfu/yr, representing a 75% reduction in the existing loads in Neabsco Creek from MS4. The expectation of the TMDL is for PWCS to address the WLAs through the “iterative implementation of BMPs in the watershed.” The TMDL states, *“It should be noted that the implementation of the WLAs for MS4 permits will focus on achieving the percent reductions required by the TMDL, rather than the individual numeric WLAs. The MS4 WLAs are aggregated by geographic boundary. It is not intended that individual numeric WLAs will be applied towards each permit. Rather, the MS4 permittees are expected to implement programmatic controls aimed at achieving the pollutant reductions identified in this TMDL. Additionally, it is anticipated that the implementation of MS4 WLAs will focus on reducing anthropogenic sources of the pollutant of concern.”*

3.0 PWCS Characterization in the TMDL Watershed

A review of the TMDLs, PWCS’s MS4 Program Plan and a field investigation of PWCS-owned and operated properties resulted in the characterization related to potential *E. coli* sources described in the following sub-sections.

3.1 Potential PWCS Sources of *E. coli* and Implemented Measures

E. coli is a bacteriological organism that is found in the intestinal tract of warm-blooded animals such as humans, pets, livestock, and wildlife. Sources of *E. coli* may include sanitary sewer systems, septic systems, livestock, wildlife, pets, and land application of manure and biosolids.

The most effective means to identify, reduce, and eliminate *E. coli* is to assess sources from PWCS properties in the impacted watershed. For the purposes of this assessment, a significant source of pollutants from a facility of concern means a discharge where the expected pollutant loading is greater than the average pollutant loading for the land use identified in the TMDL.

Table 2: PWCS Properties by Watershed

Watershed	HUC	Acres	Schools
Neabsco Creek	PL49	593.23	Ann Ludwig Support Bel-Air Elementary Beville Middle Dale City Elementary Enterprise Elementary Freedom High Gar-Field High and Transportation Hampton (Godwin) Middle Hylton High and Transportation Kerrydale Elementary King Elementary Leesylvania Elementary Marumsco Hills Elementary McAuliffe Elementary Minnieville Elementary Neabsco Elementary Penn Elementary Porter Traditional Rippon Middle Rosa Parks Elementary Saunders Middle Woodbridge Middle

Per the 2008 Bacteria TMDL for Neabsco Creek, the majority of the impaired watershed area is developed (51.2%), forested (33.1%), and agricultural (14.9%) land. Possible significant sources of *E. coli* include livestock, manure applications, industrial processes, residential septic/sewer releases, and domestic pet wastes. Significant bacteriological sources are unlikely on PWCS properties in the watershed but may include leaking/malfunctioning sanitary sewer piping, temporary portable toilets at construction sites, and pet waste from field areas.

3.1.1 Pet Waste

Waste from service animals is regulated under General School Administration Regulation 271-2, Service Animals, Section V.B.3 Provision Once Access Granted. Under this provision, a “pet area” will be designated somewhere on the school grounds to which the primary handler takes the service animal to urinate or defecate. The handler must correctly dispose of any solid waste produced by the service animal.

There are no current regulations excluding pets from exterior areas of PWCS properties. Per Prince William County Parks and Recreation’s Guidelines Governing Use of PWC Park and School Facilities, all animals on school grounds must be restrained. There are no current regulations addressing non-service animal pet waste at PWCS properties. Pet waste left on school fields within the watershed serves as a potential source of *E. coli* bacteria discharge.

3.1.2 Sanitary Sewers

No leaking or malfunctioning sanitary sewer systems have been identified at PWCS properties within the aforementioned watersheds.

3.1.3 Portable Toilets

Portable toilets are typically used on construction sites. They require regular maintenance and must be emptied to reduce anthropogenic bacteria discharge. In 2014-2015, construction activity within the Neabsco Creek watershed included the completion of a new facility, the Gar-Field Fuel Center, an addition to King ES, and the installation of a synthetic turf field at Woodbridge MS. In 2015-2016, additions were made to Beville MS, Enterprise ES, Kerrydale ES, McAuliffe ES, Neabsco ES, Rippon MS, and Saunders MS. In 2016-2017, Wilson ES was constructed, and additions were made to Dale City ES, McAuliffe ES, Minnieville ES, Neabsco ES, and Saunders ES. In 2017-2018, additions were made to Dale City ES, McAuliffe ES, Minnieville ES, Neabsco ES, and a pedestrian access was constructed at Woodbridge MS. In 2018-2019, an ADA (Americans with Disabilities Act) accessible walkways were constructed at Woodbridge MS for access to the baseball, softball, and football fields, and to the IH storage building #2. PWCS regularly monitors the condition of portable toilets on its property and includes interior and exterior checks in the annual Illicit Discharge Detection and Elimination (IDDE) inspections to prevent any discharge to

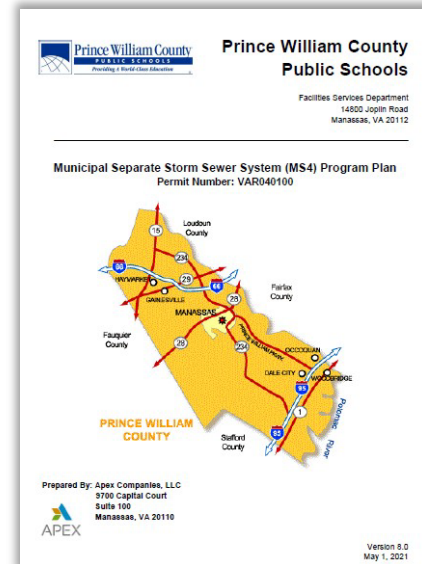
the storm sewer system. In 2019, a contracted stormwater site inspector noticed evidence of an overflowing portable toilet at Graham Park MS. The PWCS Facilities Services was notified and measures were taken to remove and replace the portable toilet to prevent *E. coli* introduction into the storm sewer system.

4.0 Applicable Overview of PWCS' MS4 Program

PWCS' MS4 Permit covers stormwater discharges from areas included within census urbanized areas. PWCS' collective efforts, as described in the PWCS MS4 Program Plan, result in significant reduction of pollutants that may be discharged from its regulated MS4.

4.1 Minimum Control Measures

The General Permit requires the Program Plan to include BMP's to address the requirements of six MCMs described in Part I E of the General Permit. BMPs already included in the PWCS Program Plan that address *E. coli* are summarized below.



4.1.1 MCM 1 Public Education and Outreach on Stormwater Impacts

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.

- Grade One: Curriculum includes identification of natural resources, factors that affect air and water quality, and recycling, reusing, and reducing consumption of natural resources.
- Grade Three: Curriculum includes aquatic ecosystems, the effects of human activity on air/water/habitat quality.
- Grade Four: Curriculum includes Virginia natural resources, watersheds and water resources, ocean environment, and the influences of human activity on ecosystems.
- Grade Five: Curriculum includes the human role in conserving limited resources.
- Grade Six: Curriculum includes the importance of protecting and maintaining water resources, the location and structure of Virginia's regional watershed systems, conservation/health/safety issues associated with watersheds, wetlands, and estuaries.
- Grade Nine: Earth Science class curriculum includes dependence on freshwater resources and the effects of human usage on water quality, regional Virginia watersheds (including the Bay and its tributaries), economic and public policy issues concerning the oceans and the coastal zone (including the Chesapeake Bay), conservation issues, and watershed monitoring.

PWCS participates in the Northern Virginia Clean Waters Partnership which educates and provides information to students and faculty on the importance of local waterways.

Students and faculty learned about their local stormwater system and how they can take action to keep their waterways clean. PWCS promotes awareness of where stormwater goes once it leaves PWCS property by labeling storm drains.

PWCS provides Custodial Advisory Training Sessions (CATS) on the impact of dumping chemicals and cleaning solutions on PWCS properties. This makes custodial staff aware of the sources and consequences of stormwater pollution. Custodial Staff Training will be provided on IDDE and stormwater for detecting and eliminating illicit discharges on school properties. 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.

4.1.2 MCM 2 Public Involvement and Participation

PWCS will post this Action Plan on their stormwater pollution prevention webpage at the https://www.pwcs.edu/departments/facilities/facilities_management/environmental_staff_and_services/stormwater_management. Availability of the Action Plan will increase awareness of the TMDL with web page visitors.

4.1.3 MCM 3 Illicit Discharge Detection and Elimination

PWCS' MS4 Program includes an IDDE Program with written procedures to detect, identify, and address non-stormwater discharges, including illegal dumping, to the small MS4 with policies and procedures for when and how to use legal authorities. PWCS prohibits non-stormwater discharges into the storm sewer system through language provided within an Illicit Discharge Ordinance. The IDDE Program includes a proactive approach to reduce illicit discharges with annual outfall screening to detect and eliminate non-stormwater discharges into the MS4. This is completed for outfalls on an annual basis.

4.1.4 MCM 4 Construction Site Stormwater Runoff Control

PWCS' Construction Program includes mechanisms to ensure compliance and enforcement on regulated construction sites that are enforced through PWCS' stormwater management (SWM) and Erosion and Sediment Control (ESC) Ordinances that are consistent with the Virginia Erosion and Sediment Control and SWM Laws and Regulations and includes:

- Required plan approval prior to commencement of a regulated land disturbance activity;
- Construction site inspections and enforcement; and
- Certification of post-construction SWM facilities

Through inspections and enforcement, especially in regard to construction SWPPP inspections, potential for *E. coli* discharges (i.e. port-a-johns) is minimized. MCM 4 BMPs in the PWCS MS4 Program Plan describe construction site runoff control BMPs.

4.1.5 MCM 5 Post-Construction Stormwater Management

PWCS's MS4 Program includes a Post-Construction SWM Program that ensures water quality criteria in the Virginia Stormwater Management Regulations has been achieved on new developments and developments on prior developed land through implementation of a SWM Ordinance. Included within the ordinance are requirements for as-built certifications for SWM BMPs and long-term maintenance covenants to ensure that SWM facilities are designed and installed in accordance with appropriate law and regulations. Although the facilities are designed to achieve target phosphorus reductions, many water quality BMPs also are effective at *E. coli* removal. MCM 5 in the PWCS MS4 Program Plan describes post-construction stormwater management BMPs.

4.1.6 MCM 6 Pollution Prevention/Good Housekeeping for Operations

PWCS's MS4 Program includes a Pollution Prevention/Good Housekeeping Program that includes policies and procedures to ensure that day-to-day operations minimize the exposure of pollutants to rainfall on PWCS-owned and operated properties to the maximum extent practicable. The program is supported with PWCS' Pollution Prevention & Good Housekeeping Manual and training for applicable staff. MCM 6 in the PWCS MS4 Program Plan describes pollution prevention and good housekeeping BMPs.

No new policies and procedures or modifications to existing policies and procedures were identified as necessary to meet the requirements of the special conditions.

4.1.7 Legal Authority

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 *E. coli* bacteria to the storm sewer system within Prince William County is Chapter 23.2 Article 2 of the Prince William County Code of Ordinances.

Section 23.2-4.3 of this ordinance states "If any activity listed in subsection 23.2-4.1(b) of this chapter is found by the director to be a source of pollutants to waters of the United States, the director shall serve a written notice on the party responsible for the activity which orders that the activity be ceased or conducted in a manner that will avoid the discharge of pollutants to the stormwater system. The notice shall state the date by which the activity shall cease or be conducted without pollution.

Failure to comply with any such order within the time stated in the notice shall constitute a violation. For any violations of this chapter, the owner must comply with the director's orders within the time specified in the notice. Failure to comply with such order shall constitute a violation of this chapter.

In addition to any penalty imposed for each violation, a judge hearing the case may direct the person responsible to remediate or correct, and each day's default in such remediation or correction shall constitute a violation of and a separate offense under this section." (Ordinance 03-87, 9-16-03)

The Prince William County Code of Ordinances directly addresses pet waste in Chapter 4.

Chapter 4 – Animals and Fowl Article 1 Section 4-11 – Allowing animals to urinate or defecate: "It shall be unlawful for any person knowingly or willingly to allow any animal belonging to that person to urinate or defecate on any public property, or the property of another without the consent of the owner of the property, or his agent, provided that it shall not be unlawful to allow urination or defecation by such animal within the curb or gutter area of a public street or roadway, and provided further that defecation by an animal on public property shall not be unlawful if the owner of the animal removes the animal's excrement immediately and disposes of it in a public trash receptacle or in a public sanitary sewer, or on the owner's own property in a lawful manner." (Ordinance Number 85-17, 2-19-85)

Chapter 4 – Animals and Fowl Article 3 Section 4-26 – Urinating or defecating on property of others or public property: "It shall be unlawful for the owner of a dog to allow such dog to urinate or defecate on the private property of other persons or on publicly owned property, except parts of parks posted as dog run areas. For the purposes of this section, private property shall include townhouse, condominium or RPC property held in common." (Code 1965, 3-17.3; Ordinance Number 77-43-32, 11-29-77)

Even though PWCS does not have regulatory authority, PWCS has developed regulations to reduce the discharge of pet waste from their properties. Regulation 271-2 V.B.3 General School Administration dated June 12, 2019 for Service Animals states that once the request for a service animal is approved, the principal should establish "a designated "pet area" somewhere on the school grounds to which the primary handler takes the animal to urinate or defecate. The handler must correctly dispose of any solid waste produced by the service animal."

5.0 Implementation of the Strategy to Reduce Bacteria

In an effort to detect and eliminate bacteriological loads from anthropogenic sources, PWCS has incorporated the detection of sewage odors into MS4 annual outfall inspections and Illicit Discharge Detection and Elimination (IDDE) program. The PWCS properties within the impaired watersheds are inspected manually as part of the MS4 program. Sewage odors above the human odor threshold serve as an early warning sign of a leaking sewer line. Routine inspections may identify and stop leaks before discharge into the impaired watersheds.

PWCS adopted more restrictive ordinances and provided waste disposal methods to reduce bacteriological loads from pet waste sources. To reduce bacteriological loads from pet waste sources, PWCS implemented and enforced additional requirements addressing pet waste at PWCS properties. New guidelines state that service animal caretakers are responsible for clean-up of pet waste on PWCS grounds.

PWCS will continue to implement and update its IDDE inspections as needed to address bacteriological discharges from properties within the impaired watersheds.

PWCS is not an approved VSMP authority; therefore, PWCS shall select at least one strategy listed in Table 3 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) of the General Permit.

Table 2: Strategies for Bacteria Reduction Stormwater Control/Management Strategy

Source	Strategies (provided as an example and not meant to be all inclusive or limiting)
Urban Wildlife	Implement and enforce urban trash management practices.
Urban Wildlife	Educate the public on how to reduce food sources accessible to urban wildlife.

These strategies will be included in the annual MS4 Program Plan update and implementation will be reported during the annual MS4 reporting process.

6.0 Schedule

PWCS will implement the practices and controls described in Section 4 and 5 to reduce the potential of *E. coli* discharged to surface waters to the maximum extent practicable. In accordance with Part II B 2 and Part II B 3 (h), respectively, PWCS will complete implementation of the TMDL action plan as soon as practicable, with the schedule of one or more of the following Table 4 actions per the MS4 permit. The method of assessment is implemented through the annual reporting process with the review of the effectiveness of each MS4 Program Plan BMP.

Table 3: Schedule of Anticipated Actions Planned for Implementation of Bacteria Reduction

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

In proceeding Annual Reports, PWCS will provide a report on the implementation of the TMDL Action Plan and associated evaluation including the results of any monitoring conducted as part of the evaluation.