



Prince William County Public Schools, Virginia

Municipal Separate Storm Sewer System Program Plan

For

General Permit No. VAR040100

During

Permit Years 2023 - 2028

From November 1, 2023, until October 31, 2028, in accordance with the VAR04 General Permit Prince William County Public Schools 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 9VAC25-890-40.

August 2026, Version 4.0

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ACRONYMS

BMP	Best Management Practice
DCR	Virginia Department of Conservation and Recreation
DEQ	Virginia Department of Environmental Quality
CUA	Census Urbanized Area/Census Urban Area
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
PCB	Polychlorinated biphenyl
PWC	Prince William County
PWCS	Prince William County Public Schools
SLAF	Stormwater Local Assistance Fund
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
VESMA	Virginia Erosion and Stormwater Management Act
VESMP	Virginia Erosion and Stormwater Management Program
WLA	Waste Load Allocation

DEFINITIONS

"Annual practice" means a nonstructural best management practice such as street or storm drain cleaning that reduces pollution for one compliance year upon implementation.

"Best management practice" (BMP) 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 TMDL Pollutants of concern" or "POC" means total nitrogen and total phosphorus.

"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.

"Ecosystem restoration projects" means practices implemented to reestablish and maintain natural systems that prevent, reduce, or remediate pollutant loadings. Examples of ecosystem restoration projects include stream restoration, shoreline restoration, land-use conversion, and reforestation.

"Existing sources" means pervious and impervious urban land uses served by the MS4 as of June 30, 2009.

"High-priority facilities" means facilities owned or operated by PWCS with drainage to any permitted MS4 that actively engage in one or more of the following activities: (i) composting; (ii) equipment storage, cleaning, and maintenance; (iii) long-term bulk materials storage; (iv) pesticide, herbicide, and fertilizer storage; (v) recycling; (vi) anti-icing and deicing agent storage, handling, and transfer; (vii) solid waste handling and transfer, and (viii) permittee owned or operated vehicle washing, maintenance, and salvage." Hydrologic Unit Code" means a watershed unit established in the most recent version of Virginia's 6th Order National Watershed Boundary Dataset.

"Hydrologic Unit Code" (HUC) 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 the permittee's MS4 that is located within the 2020 census urban areas with a population of at least 50,000 or the 2000 and 2010 decennial censuses urbanized area as determined 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.

"New sources" means pervious and impervious urban land uses served by the MS4 developed or redeveloped on or after July 1, 2009.

"Nontraditional MS4 permittee" or "nontraditional permittee" means a government entity that operates a regulated MS4 that is not under the authority of a county board of supervisors, a city council, or a town council.

"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 Prince William County Public Schools.

"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.

"The Department" means the Virginia Department of Environmental Quality

"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.

"Transitional sources" means regulated land disturbing activities that are temporary in nature and discharge through the MS4.

"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 3.0 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 PWCS's divisions and departments in the implementation of the requirements of the permit tasked with ensuring that the permit requirements are met (Part I.C.1.a);
- 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 (Part I.C.1.b);
- For each MCM in Part I.E, the following information shall be included (Part I.C.1.c):
 - Each specific requirement as listed in Part I.E for each MCM (Part I.C.1.c.(1));
 - A description of the BMPs or strategies that PWCS anticipates will be implemented to demonstrate compliance with the permit conditions in Part I.E (Part I.C.1.c.(2));
 - All standard operating procedures or policies necessary to implement the BMPs (Part I.C.1.c.(3));
 - The measurable goal by which each BMP or strategy will be evaluated (Part I.C.1.c.(4)); and
 - The persons, positions, or departments responsible for implementing each BMP or strategy (Part I.C.1.c.(5)); and
- A list of documents incorporated by reference including the version and date of the document being incorporated (Part I.C.1.d).

1.2 Special Conditions for TMDLs (Part II A, B & C)

Prince William County Schools (PWCS) is subject to the Special Conditions for the Chesapeake Bay TMDL that requires the development and submission to DEQ, a third phase TMDL Action Plan in accordance with Table 1. A BMP is provided in Section 3.1 for development of the Action Plan, and a second BMP is developed for implementation of the Action Plan.

In accordance with Table 1, BMPs are also provided to ensure PWCS determines if a wasteload allocation (WLA) has been assigned to PWCS within an approved TMDL during the reporting year and to provide public opportunity for participation in development of new TMDL Action Plans and revisions to existing TMDL Action Plans.

PWCS is subject to the Special Conditions of 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 that require an update to the previously developed local TMDL Action Plan on the progress made toward achieving local TMDL action plan goals and the anticipated end date by which PWCS will meet the sediment wasteload allocation in accordance with the deadline provided Table 1.

No additional TMDLs have been approved by the EPA between July 1, 2018, and June 30, 2023, applicable to PWCS, therefore PWCS is not required to develop or implement any TMDL action plans beyond those previously discussed.

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 IV.K. PWCS uses Prince William County (PWC) to assist with implementation of portions of Minimum Control Measure #4. PWC conducts ESC and VESMP plan review. PWCS provides inspection, enforcement, and reporting for MCM #4.

1.4 Program Modifications (Part I.C.3 & 4)

PWCS shall update the MS4 program plan to meet the requirements of this permit no later than six months (May 1, 2024) after the effective date of this permit unless otherwise specified in another permit condition (Part I.C.3) and shall post the most up-to-date version of MS4 program plan on the PWCS's website or location where the MS4 program plan can be obtained as required by Part I.E.2 within 30 days (June 1, 2024) of updating the MS4 program plan (Part I.C.4). Revisions to the MS4 program plan are expected throughout the life of this 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 this permit as a result 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.3 (Part I.C.5).

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 2026
- Good Housekeeping and Pollution Prevention Manual, June 2026
- Post-Construction Stormwater Management Inspection & Maintenance Manual, June 2026
- Phase III Chesapeake Bay TMDL Action Plan, May 2025
- Bull Run Benthic TMDL Action Plan, April 2025
- Tidal Potomac and Anacostia Rivers PCB TMDL Action Plan, April 2025
- Tributaries of the Potomac Bacteria TMDL Action Plan, April 2025
- Neabsco Creek Bacteria TMDL Action Plan, April 2025
- Broad Run, Little Bull Run, Bull Run, & Occoquan River Bacteria TMDL Action Plan, April 2025
- Outfall Information Table, June 2026
- SWM Facility Inventory, June 2026
- Nutrient Management Plans
- Notice of Interconnection Notifications
- MS4 General Permit Coverage Letter, November 2023
- Interconnection Letters to eight (8) downstream MS4s, June 2026

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 method, (i.e., how PWCS must submit) and format (i.e., how the report shall be laid out) as specified by the department; the required content of the annual report is specified in Part I.E and Part II.B. The report shall cover the previous year from July 1 to June 30 (Part I.D.1). Following notification from the department of the start date for the required electronic submission of annual reports, as provided for in 9VAC25-31-1020, such forms and reports submitted after that date shall be electronically submitted to the department in compliance with this section and 9VAC25-31-1020. There shall be at least a three-month notice provided between the notification from the department and the date after which such forms and reports must be submitted electronically (Part I.D.2).
- The annual report shall include the following general information (Part I.D.3):
 - PWCS, system name, and permit number (Part I.D.3.a);
 - The reporting period for which the annual report is being submitted (Part I.D.3.b);
 - A signed certification as per Part IV.K (Part I.D.3.c);
 - Each annual reporting item as specified in an MCM in Part I.E (Part I.D.3.d); 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 (Part I.D.3.e).
- 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 (Part I.D.5).

The MS4 program plan and, annual report reports, the Chesapeake Bay TMDL action plan, and Chesapeake Bay TMDL implementation annual status reports shall be maintained as separate documents and submitted to the department as required by this permit as separate documents (Part I.D.6).

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: Schedule for Program Implementation		
Annual Schedule		
BMP / Regulation	Necessary Action	Timeline*
6.5 / Part I.E.6.k	Review and Update SWPPP After an Unauthorized Discharge, Release or Spill Reported, if Applicable	30 Days (Review), and 90 Days (Update)
6.6 / Part I.E.6.s	Implement a Nutrient Management Plan After Final Stabilization of a Land Disturbance Project	6 Months After Final Stabilization
6.6 / Part I.E.6.u	Nutrient Management Plans Submitted to DCR	30 Days Prior to Expiration
SC3.1 / Part II.B.7	Notify DEQ in Writing of a Previously Unidentified Significant Source of PCBs within the MS4 Area	30 Days of Discovery
2.2 / Part I.E.2.d	Implement Four Public Involvement and Participation Activities	June 30
6.5 / Part I.E.6.k	Annually Review High-Priority Facilities without SWPPPs and Develop SWPPP if Required, Maintain a List of High-Priority Facilities	June 30 (Review) and December 31 (Develop)
3.1 / Part I.E.3.a.(5)	Update MS4 Map, Information Table, and Check for Any Approved TMDLs	October 1
3.4 / Part III.B, D, & E	Report BMPs Implemented and Inspected Using DEQ BMP Warehouse	October 1
1.6 & CB-SC.2 / Part I.D	Submit Annual Report and Chesapeake Bay TMDL Implementation Annual Status Report	October 1
2.1 / Part I.E.2.b.(3)	Post Annual Report and Chesapeake Bay TMDL Implementation Annual Status Report on the Stormwater Webpage	November 1 (30 Days After October 1)
Permit Cycle Schedule		
BMP/Regulation	Necessary Action	Timeline*
9VAC25-890-30	Submit Registration Statement, Draft Chesapeake Bay TMDL Action Plan	Completed (October 1, 2023)

2.1 / Part I.E.2.b	Update and Maintain a Stormwater Webpage	Completed February 1, 2024 (3 months)
6.6 / Part I.E.6.u	Nutrient Management Plans Expired on 11/1/2023 submitted to DCR	Completed May 1, 2024 (6 months)
1.4 / Part 1.C.3	Update the MS4 Program Plan	Completed May 1, 2024 (6 months)
1.4 & 2.1 / Part 1.C.3	Post an Updated MS4 Program Plan on Stormwater Webpage	Completed June 1, 2024 (30 days after 6 months)
CB-SC.1 / Part II.A.12.b	Submit Phase III Chesapeake Bay TMDL Action Plan / Public Comment Period Prior to Submittal to DEQ	Completed November 1, 2024 / 15 days (12 months)
6.5 / Part I.E.6.g	Identify Any New High-Priority Facilities within Expanded 2020 CUA	Completed November 1, 2024 (12 months)
6.6 / Part I.E.6.q	Identify Areas within Expanded 2020 CUA Requiring Nutrient Management Plans	Completed November 1, 2024 (12 months)
SC1.1, SC1.2 & SC2.1 & SC2.2 / Part II.B.2.a	Update Bull Run Sediment, Tidal Potomac and Anacostia River PCB, Tributaries of the Potomac Bacteria, Neabsco Creek Bacteria, and the Broad Run, Little Bull Run, Bull Run, and Occoquan River Bacteria TMDL as Applicable / Public Comment Period Prior to Submittal to DEQ	Completed May 1, 2025 / 15 days (18 months)
6.4 / Part I.E.6.d	Conduct GHPP/IDDE Training	Completed June 30, 2024 (Once per 24 months)
3.1 / Part I.E.3.a.(1)	Update MS4 Map	Completed November 1, 2025 (24 months)
3.1 / Part I.E.3.a.(3)	Submit GIS Geodatabase or Shapefiles of Outfalls and MS4 Area with Attribute Tables	Completed November 1, 2025 (24 months)
6.1 / Part I.E.6.b.(1)(a)	Update Anti-icing and Deicing GHPP Procedures	Completed November 1, 2025 (24 months)
3.2 / Part II.B.2.b	Develop and Initiate Implementation of TMDLs Approved by EPA on or after July 1, 2018, and Prior to October 31, 2023, in which a WLA has been Allocated / Public Comment Period Prior to Submittal to DEQ	Not Applicable May 1, 2026 / 15 days (30 months)

SC2.1 / Part II.B.6.d	Submit to DEQ an Update on the Progress Made Toward Achieving Local Sediment, Phosphorus and Nitrogen TMDL Action Plan Goals and Anticipated End Dates / Public Comment Period Prior to Submittal to DEQ	To be Completed November 1, 2026 / 15 days (36 months)
SC3.1 / Part II.B.8.c	Review GHPP Procedures for Anti-icing and Deicing Agent Application, Handling, Storage and Transport Activities / Public Comment Period Prior to Submittal to DEQ	Completed November 1, 2026 / 15 days (36 months)
6.6 / Part I.E.6.r	Develop and Implement Nutrient Management Plans on Areas within the Expanded 2020 CUA.	To be Completed November 1, 2026 (36 months)
6.6 / Part I.E.6.u	No Nutrient Management Plans Expired	To be Completed November 1, 2026 (36 months)
6.1 / Part I.E.6.b.(2)	Update Renovation and Significant Exterior Maintenance GHPP Procedures	Completed November 1, 2026 (36 months)
6.5 / Part I.E.6.h	Develop and Implement New High Priority Facility SWPPP(s), if Applicable	Not Applicable November 1, 2026 (36 months)
3.3 / Part II.C.1	Develop and Maintain Written Inspection and Maintenance Procedures for Ecosystem Restoration Projects	To be Completed November 1, 2026 (36 months)
6.4 / Part I.E.6.d	Conduct GHPP/IDDE Training	To be Completed June 30, 2026 (Once per 24 months)
3.3 / Part II.C.2	Inspect Ecosystem Restoration Projects Implemented as Part of a Current TMDL Action Plan	To be Completed November 1, 2028 (once every 60 months)
CB-SC.1 / Part II.A.12.b.(5)	Implement BMPs to Meet Cumulative Reductions Calculated in the Phase III Chesapeake Bay TMDL Action Plan	To be Completed November 1, 2028 (60 months)
CB-SC.1 / Part II.A.15	Update the Phase III Chesapeake Bay TMDL Action Plan to Offset Increased Loads from New Sources Initiating Construction between July 1, 2009, and October 31, 2023, Located in the Expanded 2020 CUA	To be Completed November 1, 2028 (60 months)
CB-SC.1 / Part II.A.16	Update the Phase III Chesapeake Bay TMDL Action Plan to Offset Increased Loads from Grandfathered Projects that Began Construction After July 1, 2014.	To be Completed November 1, 2028 (60 months)

*Not bolded text indicates schedule item is complete or not applicable. **Bolded** text indicates the schedule item is not complete or is completed continuously throughout the permit cycle.

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 (Part I.E.1.a):

- 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 fewer 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, litter control, BMP maintenance, anti-icing and deicing agent application, planned green infrastructure redevelopment, planned ecosystem restoration projects, and illicit discharges from commercial sites (Part I.E.1.b). The high-priority public education and outreach program, as a whole, shall (Part I.E.1.c):

- Clearly identify the high-priority stormwater issues (Part I.E.1.c.(1));
- Explain the importance of the high-priority stormwater issues (c Part I.E.1.c.(2));
- Include measures or actions the public can take to minimize the impact of the high-priority stormwater issues (Part I.E.1.c.(3)); and
- Provide a contact and telephone number, website, or location where the public can find out more information (Part I.E.1.c.(4)).

PWCS shall use two or more of the strategies listed in Table 2 per year to communicate to the target audience the identified high-priority stormwater issues including how to reduce stormwater pollution (Part I.E.1.d).

PWCS may coordinate its public education and outreach efforts with other MS4 permittees; however, each permittee shall be individually responsible for meeting all of its state permit requirements (Part I.E.1.e).

PWCS may identify staff, students, and faculty operated by PWCS as the target audience for education and outreach strategies (Part I.E.1.f.(4)). Staff training required for Good Housekeeping and Pollution Prevention does not qualify as a strategy for public education and outreach (Part I.E.1.f.(6)).

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, newspaper, or GIS story maps
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
Public education activities	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, or watershed walks
Public meetings	Public meetings on proposed community stormwater management retrofits, green infrastructure redevelopment, ecosystem restoration projects, TMDL development, [climate change's effects on stormwater management, voluntary residential low impact development, or other stormwater issues

A summary of PWCS's anticipated Public Education and Outreach Activities for the permit year is in Table 3. Activities will be tracked in the MS4 Tracking spreadsheet as they are completed.

Table 3: Anticipated Public Education & Outreach Activities				
#	High Priority Stormwater Issue	Strategy	Communication	Anticipated Time Period
1	Chesapeake Bay Water Quality	Curriculum Materials	Watershed education for students	July 1 – June 30
2	Illicit Discharge from Local Sources	Media Materials	Email distributing link to webpage for staff and faculty	July 1 – June 30
3	Local Waterways	Media Materials	Northern Virginia Clean Waters Partnership quarterly electronic Newsletter for staff and faculty	July 1 – June 30
4	PWCS Chesapeake Bay TMDL Action Plan	Signage or Public Education Activities	"No Mow Zone" signage and/or educational activities at the land conversion sites for staff and students	July 1 – June 30

Below is a list of high-priority stormwater issues PWCS will communicate to the public as part of the public education and outreach program (Part I.E.1.f.(1)).

High Priority Stormwater Issue No. 1: Chesapeake Bay Water Quality

Rationale (Part I.E.1.f.(2)): The location of all PWCS properties are within the Chesapeake Bay watershed.

Target Audience (Part I.E.1.f.(3)): PWCS students in 4th and 6th grade.

Strategy to Communicate High Priority Stormwater Message (Part I.E.1.f.(7)): Students will be educated and subsequently tested on knowledge of watersheds, stormwater, and water cycles.

Relevant Message (Part I.E.1.f.(7)): 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 (Part I.E.1.f.(8)): The curriculum materials will be taught once during the permit year.

Measurable Goal (Part I.E.1.i.(7)): PWCS will document the strategies and communication efforts used to teach students the curriculum materials.

High Priority Stormwater Issue No. 2: Illicit Discharge from Local Sources

Rationale (Part I.E.1.f.(2)): It is important to inform staff members and faculty about stormwater systems and associated BMP maintenance at their local facilities and the effects of illicit discharge on water quality.

Target Audience (Part I.E.1.f.(3)): PWCS staff members and faculty.

Strategy to Communicate High Priority Stormwater Message (Part I.E.1.f.(7)): Letters are emailed to inform staff about the stormwater systems at their local facilities.

Relevant Message (Part I.E.1.f.(7)): Enlist aid in identifying and eliminating any illicit discharge.

Time Period (Part I.E.1.f.(8)): Letters are emailed once within the permit year.

Measurable Goal (Part I.E.1.i.(7)): PWCS will list the high-priority issues that were addressed and the strategies used to communicate each issue.

High Priority Stormwater Issue No. 3: Local Waterways

Rationale (Part I.E.1.f.(2)): It is important to educate students and staff members on how stormwater affects local drinking water quality, and where local drinking water comes from.

Target Audience (Part I.E.1.f.(3)): PWCS staff members.

Strategy to Communicate High Priority Stormwater Message (Part I.E.1.f.(7)): An electronic quarterly newsletter is sent from Northern Virginia Clean Waters Partnership.

Relevant Message (Part I.E.1.f.(7)): 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 (Part I.E.1.f.(8)): The newsletter is emailed quarterly within the permit year.

Measurable Goal (Part I.E.1.i.(7)): PWCS will list the high-priority issues that were addressed and the strategies used to communicate each issue.

High Priority Stormwater Issue No. 4: PWCS Chesapeake Bay TMDL Action Plan

Rationale (Part I.E.1.f.(2)): PWCS is subject to the Chesapeake Bay TMDL Action Plan reductions and is using land conversions as a best management practice towards meeting its wasteload allocation.

Target Audience (Part I.E.1.f.(3)): PWCS students and staff members.

Strategy to Communicate High Priority Stormwater Message (Part I.E.1.f.(7)): Signage targeting both maintenance staff and students and educational activities targeting students at the “No Mow Zones.”

Relevant Message (Part I.E.1.f.(7)): The signage serves to inform maintenance staff not to mow in the “No Mow Zones.” The signage along with accompanying educational activities to teach students about the purposes of “No Mow Zones.”

Time Period (Part I.E.1.f.(8)): The signage is permanently installed at the “No Mow Zones” and can be viewed by maintenance staff and students all year. Additionally, the educational activities occur once during the permit year.

Measurable Goal (Part I.E.1.i.(7)): 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 with dates and number of students educated; (2) Letters emailed with dates and number of staff sent to; (3) Quarterly newsletters emailed with dates and number of students and faculty sent to; and (4) Spreadsheet of “No Mow Zones” with or without signage; or list of implemented educational activities and dates.

Responsible individual for implementation: PWCS MS4 Stormwater Project Manager/Inspector

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

BMP 2.1 Webpage Dedicated to MS4 Program & Stormwater Pollution Prevention (Part I.E.2)

Description: PWCS shall develop and implement procedures to allow for the following (Part I.E.2.a):

- 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 (Part I.E.2.a.(1));
- The public to provide comments on PWCS's MS4 Program plan (Part I.E.2.a.(2));
- Responding to public comments received on the MS4 Program plan or complaints (Part I.E.2.a.(3)); and
- Maintaining documentation of public comments received on the MS4 Program and associated MS4 Program plan and PWCS's response (Part I.E.2.a.(4)).

Procedures for Public Comments or Complaints concerning the MS4 Program Plan

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 PWCS MS4 Stormwater Project Manager/Inspector, they 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 three months after the permit's effective date (February 1, 2024), PWCS shall update and maintain the webpage dedicated to the MS4 Program and stormwater pollution prevention (Part I.E.2.b). The following will be maintained on the PWCS's Stormwater webpage:

- The effective MS4 permit and coverage letter (Part I.E.2.b.(1));
- The most current MS4 Program plan or location where the MS4 Program plan can be obtained (Part I.E.2.b.(2));
- The annual report for each year of the term covered by this permit no later than 30 days after submittal to the Department (Part I.E.2.b.(3));
- The most current Chesapeake Bay TMDL action plan or location where the Chesapeake Bay TMDL action plan can be obtained (Part I.E.2.b.(4));
- The Chesapeake Bay TMDL implementation annual status reports for each year of the term covered by this permit no later than 30 days after submittal to the department (Part I.E.2.b.(5));
- 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 (Part I.E.2.b.(6));
- Methods for how the public can provide comments on PWCS's MS4 Program plan in accordance with Part I.E.2.a.(2); and if applicable, the Chesapeake Bay TMDL action plan in accordance with Part II A 13 (Part I.E.2.b.(7)).

Webpage address:

https://www.pwcs.edu/about/departments/risk_safety/environmental_services/stormwater_management

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

Responsible individual for implementation: PWCS MS4 Stormwater Project Manager/Inspector

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 (November 1) to DEQ 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's 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 I.E.2)

Description: PWCS will implement, promote, participate in, or coordinate on no fewer than four activities per year for two or more of the categories listed in Table 4 to provide an opportunity for public involvement to improve water quality and support local restoration and clean-up projects (Part I.E.2.d).

- 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 (Part I.E.2.e).
- PWCS may also include staff and students in public participation events; however, the activity cannot solely include or be limited to staff participants with stormwater, groundskeeping, and maintenance duties in order for an event to qualify as a public participation event (Part I.E.2.f).
- Staff training required in accordance with Part I.E.6.d does not qualify as a public participation event unless the training activity solicits participation from target audiences beyond staff or contractors with stormwater, groundskeeping, and maintenance duties (Part I.E.2.g).

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, watershed, shoreline, beach, or park clean-up day, adopt-a-waterway program, tree plantings, and riparian buffer plantings.
Public education activities	Booth at community fair, demonstration of stormwater control projects, climate change's effects on stormwater management, presentation of stormwater materials to schools to meet applicable education Standards of Learning or curriculum requirements, or watershed walks.
Public meetings	Public meetings on proposed community stormwater management retrofits, green infrastructure redevelopment, ecosystem restoration projects, TMDL development, voluntary residential low impact development, climate change's effects on stormwater management, or other stormwater issues
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 provides the anticipated activities for the permit reporting year including (Part I.E.2.h.(3)):

- 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.

Activities are tracked in the MS4 Tracking spreadsheet as they are completed.

Table 5: Anticipated Public Involvement Activities			
Category	Activity Description	Anticipated Time Period for the Activity to Occur	Metric to Determine Benefit to Water Quality
Pollution Prevention	Adopt a GeoCurve Inlet Filter and Educational Program	July 1 – June 30	Number of adopted GeoCurves and educational materials
Educational Event	Meaningful Watershed Educational Experience (MWEE)	July 1 – June 30	Date of event and number of students
Restoration	Students seed the “No Mow Zone”	April	Date of restoration activity and number of students
Educational Event	Student Environmental Action Showcase Event (SEAS)	July 1 – June 30	Date of event and 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 MS4 Stormwater Project Manager/Inspector

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 I.E.3)

Description: PWCS shall develop and maintain an accurate MS4 map and information table as follows (Part I.E.3.a):

- An updated map of the MS4 owned or operated by PWCS within MS4 regulated service area no later than 24 months (November 1, 2025) after the permit effective date that includes, at a minimum (Part I.E.3.a.(1)):
 - MS4 outfalls discharging to surface waters, except as follows (Part I.E.3.a.(1)(a)):
 - In cases where the outfall is located outside of the PWCS'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 PWCS 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 (Part I.E.3.a.(1)(b));
 - The name and location of receiving waters to which the MS4 outfall or point of discharge discharges (Part I.E.3.a.(1)(c));
 - MS4 regulated service area (Part I.E.3.a.(1)(d)); and
 - Stormwater management facilities owned or operated by PWCS (Part I.E.3.a.(1)(e)).
- PWCS shall maintain an outfall information table associated with the MS4 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). The outfall information table may be maintained as a shapefile attribute table. The outfall information table shall contain the following (Part I.E.3.a.(2)):
 - A unique identifier as specified on the MS4 map (Part I.E.3.a.(2)(a));
 - The latitude and longitude of the outfall or point of discharge (Part I.E.3.a.(2)(b));
 - The estimated regulated acreage draining to the outfall or point of discharge (Part I.E.3.a.(2)(c));
 - The name of the receiving water (Part I.E.3.a.(2)(d));
 - The 6th Order Hydrologic Unit Code of the receiving water (Part I.E.3.a.(2)(e));
 - An indication as to whether the receiving water is listed as impaired in the Virginia 2022 305(b)/303(d) Water Quality Assessment Integrated Report (Part I.E.3.a.(2)(f)); and
 - The name of any EPA approved TMDLs for which PWCS is assigned a wasteload allocation (Part I.E.3.a.(2)(g)).
- No later than 24 months (November 1, 2025) after permit issuance, PWCS shall submit to DEQ a format file geodatabase or two shapefiles that contain at a minimum (Part I.E.3.a.(3)):
 - A point feature class or shapefile for outfalls with an attribute table containing outfall data elements required in accordance with Part I.E.3.a.(2) (Part I.E.3.a.(3)(a)); and

- A polygon feature class or shapefile for the MS4 service area as required in accordance with Part I.E.3.a.(1)(d) with an attribute table containing the following information (Part I.E.3.a.(3)(b)):
 - MS4 operator name;
 - MS4 permit number (VAR04); and
 - MS4 service area total acreage rounded to the nearest hundredth.
- All file geodatabase feature classes or shapefiles shall be submitted in the following data format standards (Part I.E.3.a.(4)):
 - Point data in NAD83 or WGS84 decimal degrees global positional system coordinates (Part I.E.3.a.(4)(a));
 - Data projected in Virginia Lambert Conformal Conic format (Part I.E.3.a.(4)(b));
 - Outfall location accuracy shall be represented in decimal degrees rounded to at least the fifth decimal place for latitude and longitude to ensure point location accuracy (e.g., 37.61741, -78.15279) (Part I.E.3.a.(4)(c)); and
 - Metadata that shall provide a description of each feature class or shapefile dataset, units of measure as applicable, coordinate system, and projection (Part I.E.3.a.(4)(d)).
- No later than October 1 of each year, PWCS shall update the MS4 map and outfall information table to include any new outfalls constructed or approved or both during the immediate preceding reporting period (Part I.E.3.a.(5)).
- 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 (Part I.E.3.a.(6)).

Table 6: List of Interconnected MS4 Regulated Area(s)

Prince William County City of Manassas	Town of Dumfries
City of Manassas Park	Virginia Department of Transportation, Northern Urban Area
George Mason University, Science and Technology Campus	Northern Virginia Community College
US Marine Corps Base Quantico/Federal Bureau of Investigation National Academy	City of Manassas

Necessary documentation for implementation: (1) Storm sewer system map; (2) Outfall Information Table; and (3) GIS compatible geodatabase or shapefiles of MS4 map; and (4) If applicable, written notification of physical interconnections to the downstream MS4.

Responsible individual for implementation: PWCS MS4 Stormwater Project Manager/Inspector

Implementation schedule: The MS4 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 geodatabase or shapefiles 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 MS4. 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 (Part 1.E.3.b).

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 6.2.

Necessary documentation for implementation: (1) Chapter 23.2 Article 2 of the Prince William County Code of Ordinances.

Responsible individual for implementation: PWCS MS4 Stormwater Project Manager/Inspector

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 I.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 MS4 to effectively eliminate the unauthorized discharge. Written procedures shall include (Part I.E.3.c):

- 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 (Part I.E.3.c.(1)).
- Dry weather field screening protocols to detect, identify, and eliminate illicit discharges to the MS4. The protocol shall include (Part I.E.3.c.(2)):
 - 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 (Part I.E.3.c.(2)(a));
 - If the total number of MS4 outfalls is equal to or less than 50, a schedule to screen all outfalls annually (Part I.E.3.c.(2)(b));
 - 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 (Part I.E.3.c.(2)(c));
 - PWCS may adopt a risk-based approach to dry weather screening identifying observation points based upon illicit discharge risks upstream of an outfall. Observation points may include points of interconnection, manholes, points of discharge, conveyances, or inlets suspected to have a high likelihood of receiving illicit discharges (Part I.E.3.c.(2)(d));
 - Each observation point screened may be counted as one outfall screening activity equivalent and counted towards the requirements of Part I.E.3.c.(2)(b) or Part I.E.3.c.(2)(c); however, at least 50% of the minimum annual screening events must include outfall screening (Part I.E.3.c.(2)(e));
 - Illicit discharges reported by the public and subsequent investigations may not be counted as screening events; however, once the resolution of the investigation and the date the investigation was closed has been documented, an observation point may be established for future screening events (Part I.E.3.c.(2)(f)); and
 - A checklist or mechanism to track the following information for dry weather screening events (Part I.E.3.c.(2)(g)):
 - The unique identifier for the outfall or observation point;
 - 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);
 - Observed indicators of possible illicit discharge events, such as floatables, deposits, stains, and vegetative conditions (e.g., dying or dead vegetation, excessive vegetative growth);
 - Whether or not a discharge was observed;
 - If a discharge was observed, the estimated discharge and visual characteristics of the discharge (e.g., odor, color, clarity) and the physical condition of the outfall; and
 - For observation points, the location, downstream outfall unique identifier, and risk factors or rationale for establishing the observation point.

- 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 (Part I.E.3.c.(3)).
- 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 (Part I.E.3.c.(4)).
- Methodologies for conducting a follow-up investigation for illicit discharges that are continuous or that PWCS expects 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). (Part I.E.3.c.(5)); and
- A mechanism to track all illicit discharge investigations to document the following (Part I.E.3.c.(6)):
 - The dates that the illicit discharge was initially observed, reported, or both (Part I.E.3.c.(6)(a));
 - The results of the investigation, including the source, if identified (Part I.E.3.c.(6)(b));
 - Any follow-up to the investigation (Part I.E.3.c.(6)(c));
 - Resolution of the investigation (Part I.E.3.c.(6)(d)); and
 - The date that the investigation was closed (Part I.E.3.c.(6)(e)).

The IDDE procedures described in Part I.E.3.c, the MS4 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.

The outfall information table is maintained in the MS4 Tracking spreadsheet. The MS4 Tracking spreadsheet is used to document the annual outfall screening results and any IDDEs.

Necessary documentation for implementation: (1) Illicit Discharge Detection and Elimination (IDDE) Manual; (2) Outfall information table; (3) MS4 map; and (4) Outfall screening field forms.

Responsible individual for implementation: PWCS MS4 Stormwater Project Manager/Inspector

Implementation schedule: Annual outfall screening, as described in PWCS's 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.

BMP 4.1 ESC Compliance for Land Disturbing Activities (Part I.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 shall control construction site stormwater runoff as follows (Part I.E.4):

- PWCS is a school board or other local government body and shall inspect those projects resulting in a land disturbance as defined in § 62.1-44.15.51 of the Code of Virginia occurring on lands owned or operated by PWCS that result in the disturbance of 10,000 square feet or greater, 2,500 square feet or greater in accordance with areas designated under the Chesapeake Bay Preservation Act, or in accordance with more stringent thresholds established by the local government, as follows (Part I.E.4.a.(5)):
 - During or immediately following initial installation of erosion and sediment controls (Part I.E.4.a.(5)(a));
 - At least once per every two-week period (Part I.E.4.a.(5)(b));
 - Within 48 hours following any runoff producing storm event (Part I.E.4.a.(5)(c)); and
 - At the completion of the project prior to the release of any performance bond (Part I.E.4.a.(5)(d)).
- PWCS shall require implementation of appropriate controls to prevent non-stormwater discharges to the MS4, such as wastewater, concrete washout, fuels and oils, and other illicit discharges identified during land disturbing activity inspections. The discharge of non-stormwater discharges other than those identified in 9VAC25-890-20 D through the MS4 is not authorized by this state permit (Part I.E.4.b).
- PWCS employees and contractors serving as plan reviewers, inspectors, program administrators, and construction site operators shall obtain the appropriate certifications as required under the Virginia Erosion and Stormwater Management Act and its attendant regulations (Part I.E.4.c).
- A description of the legal authorities utilized to ensure compliance with Part I.E.4. for erosion and sediment control and construction site stormwater runoff control such as ordinances, permits, orders, specific contract language, policies, and interjurisdictional agreements (Part I.E.4.d.(4));
- Written inspection procedures that include the following (Part I.E.4.d.(6)):
 - An inspection checklist for documenting onsite erosion and sediment control structures and systems are properly maintained and repaired as needed to ensure continued performance of their intended function (Part I.E.4.d.(6)(a)); and
 - A list of all associated documents utilized for inspections, including checklists, department approved erosion and sediment control plans, or the most recently department approved annual standards and specifications, and any other documents utilized (Part I.E.4.d.(6)(b));
- Written procedures for requiring compliance with department approved erosion and sediment control plans through corrective action or enforcement action to the extent allowable under federal, state, or local law, regulation, ordinance, or other legal mechanisms (Part I.E.4.d.(8)); and
- The roles and responsibilities of each of PWC's departments, divisions, or subdivisions in implementing the erosion and sediment control and construction site stormwater runoff control requirements in Part I.E.4. (Part I.E.4.d.(9)).

Prince William County (PWC) is the VESMP authority and conducts plan review, inspections, and enforcement for PWCS. PWC and PWCS have an agreement, Designation of VESMP Authority and Oversight for Prince William County Schools, and established roles and responsibilities under the VESMP. PWCS is the permit holder of construction sites on PWCS property and holds a contract with a third-party consulting firm to conduct self-inspections. PWC provides the following:

- **Erosion and Sediment Control and Stormwater Management Plan Approval:** PWCS does not operate a Virginia Erosion and Stormwater Management 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; (2) PWC Design and Construction Standards Manual; (3) the Virginia Stormwater Management Handbook; and (4) Prince William County construction implementation documents (i.e. inspection forms).
- **Erosion and Sediment Control and Stormwater Management Inspections:** PWC conducts all construction oversight inspections and relies upon DEQ certified inspectors to perform each inspection. PWC staff have certificates of competence in accordance with 9VAC25-850-40 for its project managers and inspectors. PWCS conducts construction permit self-inspections at the frequency required by the Construction General Permit.
- **Erosion and Sediment Control and Stormwater Management Compliance and Enforcement:** PWC conducts inspections, identifies deficiencies and provides follow-up.

Necessary documentation for implementation: (1) ESC & SWM Plan(s) approved by PWC; and (2) Completed PWC Inspection Forms and follow-up for each regulated project.

Roles and responsible individual for implementation: PWCS MS4 Stormwater Project Manager/Inspector

Implementation schedule: The implementation of this BMP will be ongoing 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 (Part I.E.5.a):

- Since PWCS is a school board or other local government body, PWCS shall implement a post-construction stormwater runoff control program through compliance with 9VAC25-875 or in accordance with more stringent local requirements, if applicable, and with the implementation of a maintenance and inspection program consistent with Part I.E.5.a.(6).

PWCS shall implement an inspection and maintenance program for those stormwater management facilities owned or operated by PWCS as follows (Part I.E.5.b):

- Within six months (May 1, 2024) of the permit effective date, 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 may use inspection and maintenance specifications available from the Virginia Stormwater BMP Clearinghouse or inspection and maintenance plans developed in accordance with the department's Stormwater Local Assistance Fund (SLAF) guidelines (Part I.E.5.b.(1));
- Employees and contractors implementing the stormwater program shall obtain the appropriate certifications as required under the Virginia Stormwater Management Act and its attendant regulations (Part I.E.5.b.(2));
- PWCS shall inspect stormwater management facilities owned or operated by PWCS no less frequently 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 often than once per five years (Part I.E.5.b.(3)); 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) (Part I.E.5.b.(4)).

PWCS shall include in the MS4 Program Plan the following (Part I.E.5.d):

- A description of the legal authorities utilized to ensure compliance with Part I.E.5.a for post-construction stormwater runoff control such as ordinances (provide citation as appropriate), permits, orders, specific contract language, and interjurisdictional agreements (Part I.E.5.d.(3));
- Written inspection and maintenance procedures and other associated template documents utilized during inspection and maintenance of stormwater management facilities owned or operated by PWCS (Part I.E.5.d.(4)); and
- The roles and responsibilities of each of PWCS's departments, divisions, or subdivisions in implementing the post-construction stormwater runoff control program (Part I.E.5.d.(5)).

PWCS will ensure post-construction stormwater management (SWM) for all regulated land disturbing activities 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 VESMP 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 V (9VAC25-875-470 et seq.) of 9VAC25-875; 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 5.1.

PWCS will perform long-term operations and maintenance of all stormwater facilities utilizing the inspection and maintenance plans obtained from implementation of BMP 5.1. Where inspection and maintenance plans are not available from approved SWM plans, PWCS will utilize BMP-specific inspection and maintenance instruction from the Virginia Stormwater Management Handbook or 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 every (5) five years in accordance with the Post-construction Stormwater Management Inspection and Maintenance Manual Section 3.0 Inspection Frequency.

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 Inventory.

Necessary documentation for implementation: 1) PWCS Post-Construction Stormwater Manual; (2) Virginia Stormwater Management Handbook; (3) PWC approved SWM Plans and Calculations; (4) SWM Facility Inspection and Maintenance Plans; (5) Inspection Forms; and (6) SWM Facility Inventory.

Responsible individual for implementation: PWCS MS4 Stormwater Project Manager/Inspector

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

Description: PWCS shall maintain and implement written good housekeeping procedures for those activities listed in Part I.E.6.b at facilities owned or operated by PWCS designed to meet the following objectives (Part I.E.6.a):

- Prevent illicit discharges (Part I.E.6.a.(1));
- Ensure PWCS staff or contractors properly dispose of waste materials, including landscape wastes and prevent waste materials from entering the MS4 (Part I.E.6.a.(2));
- Prevent the discharge of wastewater or wash water not authorized in accordance with 9VAC25-890-20 D.3.u, into the MS4 without authorization under a separate VPDES permit (Part I.E.6.a.(3)); and
- Minimize the pollutants in stormwater runoff (Part I.E.6.a.(4)).

PWCS shall develop and implement written good housekeeping procedures that meet the objectives established in Part I.E.6.a for the following activities (Part I.E.6.b):

- Road, street, sidewalk, and parking lot maintenance and cleaning (Part I.E.6.b.(1)):
 - Within 24 months (November 1, 2025) of permit issuance, PWCS shall update and implement procedures in accordance with Part I.E to include implementation of best management practices for anti-icing and deicing agent application, transport, and storage (Part I.E.6.b.(1)(a));
 - Procedures developed in accordance with Part I.E shall prohibit the application of any anti-icing or deicing agent containing urea or other forms of nitrogen or phosphorus (Part I.E.6.b.(1)(b));
- Renovation and significant exterior maintenance activities (e.g., painting, roof resealing, and HVAC coil cleaning) not covered under a separate VESMP construction general permit. PWCS shall develop and implement procedures no later than 36 months (November 1, 2026) after permit issuance (Part I.E.6.b.(2));
- Discharging water pumped from construction and maintenance activities not covered by another permit covering such activities (Part I.E.6.b.(3));
- Temporary storage of landscaping materials (Part I.E.6.b.(4));
- Maintenance of PWCS owned or operated vehicles and equipment (i.e., prevent pollutant discharges from leaking PWCS owned vehicles and equipment) (Part I.E.6.b.(5));
- Application of materials, including pesticides and herbicides shall not exceed manufacturer's recommendations (Part I.E.6.b.(6)); and
- Application of fertilizer shall not exceed maximum application rates established by applicable nutrient management plans. For areas not covered under nutrient management plans where fertilizer is applied, application rates shall not exceed the manufacturer's recommendations (Part I.E.6.b.(7)).

A list of written good housekeeping procedures for the operations and maintenance activities as required by Part I.E.6.a and b are included in the Good Housekeeping and Pollution Prevention Program Manual incorporated by reference (Part I.E.6.x.(1)).

Necessary documentation for implementation: (1) PWCS Good Housekeeping/Pollution Prevention Program Manual; (2) PWCS High-Priority SWPPPs; (3) Training documentation; and (4) Completed Comprehensive Evaluation forms. All documentation is incorporated into the PWCS Good Housekeeping/Pollution Prevention Program Manual; and (4) Nutrient Management Plans.

Responsible individual for implementation: PWCS MS4 Stormwater Project Manager/Inspector

Implementation schedule: Training will be provided once every 24 months, and comprehensive evaluations will be performed annually. 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 6.5, evaluated with a comprehensive evaluation as described for the measure of effectiveness for BMP 6.1, and the Pollution Prevention training described in BMP 6.4.

BMP 6.2 Contractor Safeguards, Measures and Procedures (Part I.E.6.c)

Description: PWCS shall require through the use of contract language, training, written procedures, or other measures within PWCS's legal authority that contractors employed by PWCS and engaging in activities described in Part I.E.6.b follow established good housekeeping procedures and use appropriate control measures to minimize the discharge of pollutants to the MS4.

All contractors performing work on PWCS's MS4 property shall be subject to the current Virginia regulation 9VAC25-890-40 The General VPDES Permit for Discharges of Stormwater from Small Municipal Separate Storm Sewer Systems (MS4); and the latest versions of PWCS's MS4 Program Plan, Good Housekeeping and Pollution Prevention Manual, and Nutrient Management Plan provided on the webpage below. Contractors implementing the stormwater program shall obtain the appropriate certifications as required under the Virginia Stormwater Management Act (VSMA) and its attendant regulations.

A Contractor Good Housekeeping and Pollution Prevention log is utilized to make Contractors aware of the documented procedures that they will adhere to in order to perform work on PWCS property.

<https://law.lis.virginia.gov/admincode/title9/agency25/chapter890/section40/>

https://www.pwcs.edu/about/departments/risk_safety/environmental_services/stormwater_management

This BMP is not intended for regulated land disturbing activity addressed with BMPs 4.1, 5.1, and 6.1.

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

Responsible individual for implementation: PWCS MS4 Stormwater Project Manager/Inspector

Implementation schedule: PWCS will ensure contractors engaging in activities with the potential to discharge pollutants are made aware of and have access to written procedures to minimize the discharge of pollutants to the MS4.

Measurable goals: Effectiveness will be measured by all contractors were made aware of and have access to the MS4 Program Plan and Good Housekeeping and Pollution Prevention manual via PWCS's stormwater webpage.

BMP 6.3 Contractor Certification for Pesticide Application (Part I.E.6.d.(6))

Description: Employees and 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. Contracts for the application of pesticide and herbicides executed after the effective date of this permit shall require contractor certification (Part I.E.6.d.(6)).

Necessary documentation for implementation: (1) Contract requiring certification; and/or (2) Proof of staff certifications.

Responsible individual for implementation: PWCS MS4 Stormwater Project Manager/Inspector

Implementation schedule: PWCS will continue to ensure contractor and/or staff certifications for the application of pesticides and herbicides.

Measurable goal: Effectiveness will be measured by all signed contracts executed for pesticide and herbicide application and/or staff will maintain their certifications.

BMP 6.4 Employee Good Housekeeping/Pollution Prevention Training Plan (Part 1.E.6.d)

Description: The written procedures established in accordance with Part I.E.6.a and b shall be utilized as part of the employee training program, and PWCS shall develop a written training plan for applicable field personnel that ensures the following (Part I.E.6.d):

- Applicable field personnel shall receive training in the prevention, recognition, and elimination of illicit discharges no less often than once per 24 months (Part I.E.6.d.(1));
- Employees performing road, street, sidewalk, and parking lot maintenance shall receive training in good housekeeping procedures required under Part I.E.6.b.(1) no less often than once per 24 months (Part I.E.6.d.(2));
- Employees working in and around facility maintenance, public works, or recreational facilities shall receive training in applicable Part I E 6 a and b good housekeeping procedures required no less often than once per 24 months (Part I.E.6.d.(3));
- Employees working in and around high-priority facilities with a stormwater pollution prevention plan (SWPPP) shall receive training in applicable site specific SWPPP procedures no less often than once per 24 months (Part I.E.6.d.(4));
- Employees whose duties include emergency spill control and response shall be trained in spill control and response. Emergency responders, such as firefighters and law-enforcement officers, trained on the handling of spill control and response as part of a larger emergency response training shall satisfy this training requirement and be documented in the training plan (Part I.E.6.d.(5)); and
- Employees and contractors hired by PWCS who apply pesticides and herbicides shall be trained and 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. Contracts for the application of pesticide and herbicides executed after the effective date of this permit shall require contractor certification (Part I.E.6.d.(6)).

PWCS shall maintain documentation of each training activity conducted by PWCS to fulfill the requirements of Part I.E.6.d for a minimum of three years after the training activity completion. The documentation shall include the following information (Part I.E.6.e):

- The date when applicable employees have completed the training activity (Part I.E.6.e.(1));
- The number of employees who have completed the training activity (Part I.E.6.e.(2)); and
- The training objectives and good housekeeping procedures required under Part I.E.6.a covered by training activity (Part I.E.6.e.(3)).

PWCS may fulfill the training requirements in Part I.E.6.d, 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 (Part I.E.6.f).

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

- Training to employees in and around recreational facilities (Part I.E.6.d.(3)); and
- Emergency responders such as firefighters and law-enforcement officers, trained on the handling of spill control and response as part of a larger emergency response training (Part I.E.6.d.(5)).

The PWCS MS4 Stormwater Project Manager provides some applicable employees with a link via email to watch a MS4 Training video via SurveyMonkey. SurveyMonkey provides a record of the people who took the training. The PWCS MS4 Stormwater Project Manager also performs an in-person training for some applicable employees where the MS4 Training video is presented and the employees sign an MS4 training roster as record of completion of the MS4 training. PWCS staff are required to call Prince William County emergency responders trained in handling spill control and emergency response. See Table 7 for training of applicable employees within the permit cycle. Training is documented in the MS4 Tracking spreadsheet.

Table 7: Anticipated Training			
Permit Requirement	Employee Type	Training Type	Method
Part I.E.6.d.(1), (2) & (4)	Facilities Maintenance	IDDE, GHPP & SWPPP	Video module
Part I.E.6.d.(6)	Pesticide Applicators	Pesticide certification	In-person or virtual class

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

Responsible individual for implementation: PWCS MS4 Stormwater Project Manager/Inspector

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.

BMP 6.5 Stormwater Pollution Prevention Plan (Part 1.E.6.g)

Description: Within 12 months (November 1, 2024) PWCS shall identify any new high-priority facilities located in expanded 2020 census urban areas with a population of at least 50,000 (Part 1.E.6.g); and within 36 months (November 1, 2026) PWCS shall implement SWPPPs for high-priority facilities meeting the conditions of Part 1.E.6.i and which are located in expanded 2020 census urban areas with a population of at least 50,000 (Part 1.E.6.h). PWCS shall maintain and implement a site-specific SWPPP for each high priority facility as defined in 9VAC25-890-1 that does not have or require separate VPDES permit coverage, 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 (Part 1.E.6.i):

- Areas where residuals from using, storing or cleaning machinery or equipment remain and are exposed to stormwater (Part 1.E.6.i.(1));
- Materials or residuals on the ground or in stormwater inlets from spills or leaks (Part 1.E.6.i.(2));
- Material handling equipment (Part 1.E.6.i.(3));
- 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) (Part 1.E.6.i.(4));
- Materials or products stored outdoors (except final products intended for outside use where exposure to stormwater does not result in the discharge of pollutants) (Part 1.E.6.i.(5));
- 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 (Part 1.E.6.i.(6));
- Waste material except waste in covered, nonleaking containers (e.g., dumpsters) (Part 1.E.6.i.(7));
- Application or disposal of process wastewater (unless otherwise permitted) (Part 1.E.6.i.(8)); 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 (Part 1.E.6.i.(9)).

Each SWPPP as required in Part 1.E.6.g shall include the following (Part 1.E.6.j):

- A site description that includes a site map identifying all outfalls, direction of stormwater flows, existing source controls, and receiving water bodies (Part 1.E.6.j.(1));
- A description and checklist of the potential pollutants and pollutant sources (Part 1.E.6.j.(2));
- A description of all potential non-stormwater discharges (Part 1.E.6.j.(3));
- A description of all structural control measures, such as stormwater management facilities and other pollutant source controls, applicable to SWPPP implementation (e.g., permeable pavement or oil-water separators that discharge to sanitary sewer are not applicable to the SWPPP), such as oil-water separators, and inlet protection designed to address potential pollutants and pollutant sources at risk of being discharged to the MS4 (Part 1.E.6.j.(4));
- A maintenance schedule for all stormwater management facilities and other pollutant source controls applicable to SWPPP implementation described in Part 1.E.6.h.(4) (Part 1.E.6.j.(5));
- Site specific written procedures designed to reduce and prevent pollutant discharge that incorporate by reference applicable good housekeeping procedures required under Part 1.E.6.a and b (Part 1.E.6.j.(6));
- A description of the applicable training as required in Part 1.E.6.d.(4) (Part 1.E.6.j.(7));
- An inspection frequency of no less often 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 (Part 1.E.6.j.(8));

- A log of each unauthorized discharge, release, or spill incident reported in accordance with Part IV G including the following information (Part I.E.6.j.(9)):
 - Date of incident;
 - Material discharged, released, or spilled; and
 - Estimated quantity discharged, released or spilled.
- A log of modifications to the SWPPP made as the result of any unauthorized discharge, release, or spill in accordance Part I.E.6.j or changes in facility activities and operation requiring SWPPP modification (Part I.E.6.j.(10)); and
- The point of contact for SWPPP implementation (Part I.E.6.j.(11)).

No later than June 30 of each year, PWCS shall annually review any high-priority facility owned or operated by the PWCS for which an SWPPP has not been developed to determine if the facility meets any of the conditions described in Part I.E.6.g. If the facility is determined to need an SWPPP, PWCS shall develop an SWPPP meeting the requirements of Part I.E.6.h no later than December 31 of that same year. PWCS shall maintain a list of all high-priority facilities owned or operated by PWCS not required to maintain an SWPPP in accordance with Part I.E.6.g and this list shall be available upon request (Part I.E.6.k).

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 IV 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 (Part I.E.6.l).

The SWPPP shall be kept at the high-priority facility and utilized as part of employee SWPPP training required in Part I.E.6.d(4). 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 (Part I.E.6.m).

If activities change at a facility such that the facility no longer meets the definition of a high-priority facility, PWCS may remove the facility from the list of high-priority facilities with a high potential to discharge pollutants (Part I.E.6.n).

If activities change at a facility such that the facility no longer meets the criteria requiring SWPPP coverage as described in Part I.E.6.g, PWCS may remove the facility from the list of high-priority facilities that require SWPPP coverage (Part I.E.6.o).

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 (Part I.E.6.b.(1)(b)).

The SWPPP will provide instructions for updates, as necessary, to reflect changes, 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 and kept with the SWPPP. The MS4 Tracking spreadsheet documents any spills and subsequent modifications to the SWPPPs.

PWCS shall provide a list of all high-priority facilities owned or operated by PWCS required to maintain a SWPPP in accordance with Part I.E.6.g that includes the facility name, facility location, and the location of the SWPPP hardcopy or electronic document being maintained. The SWPPP for each high-priority facility shall be incorporated by reference (Part I.E.6.x.(2)).

Table 8: List of High Priority Facilities		
High Priority Facility	Address	Location of SWPPP
Gar-Field Transportation	14000 Smoketown Road Woodbridge, VA 22192	14800 Joplin Rd. in Building 52 in the Environmental shop
Hylton High School	14051 Spriggs Road Woodbridge, VA 22193	14800 Joplin Rd. in Building 52 in the Environmental shop
McCuin Transportation	7900 Piney Branch Lane Bristow, VA 20136	14800 Joplin Rd. in Building 52 in the Environmental shop
Potomac Transportation	3501 Panther Pride Drive Dumfries, VA 22026	14800 Joplin Rd. in Building 52 in the Environmental shop
Osborn Park Auto Shop	8909 Euclid Avenue Manassas, VA 20111	14800 Joplin Rd. in Building 52 in the Environmental shop
Woodbridge Transportation	3001 Old Bridge Road Woodbridge, VA 22191	14800 Joplin Rd. in Building 52 in the Environmental shop
Western Bus Facility	5728 Wellington Rd Gainesville, VA 20155	14800 Joplin Rd. in Building 52 in the Environmental shop

Necessary documentation for implementation: (1) Good Housekeeping & Pollution Prevention Manual; (2) SWPPP's; and (3) SWPPP inspection forms.

Responsible individual for implementation: PWCS MS4 Stormwater Project Manager/Inspector

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 SWPPP no later than 30 days after an unauthorized discharge, release or spill reported in accordance with Part IV.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 SWPPP inspection will be completed once per year.

Measurable goals: Effectiveness will be measured by the completed SWPPP inspection 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's 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 6.6 Turf and Landscape Management (Part I.E.6.p)

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 (Part I.E.6.p and w).

Within 12 months of permit coverage, PWCS shall identify contiguous areas greater than one acre located in expanded 2020 census urban areas with population of at least 50,000 and within the permittee's MS4 service area requiring turf and landscape nutrient management plans (Part I.E.6.q).

Within 36 months of permit coverage, PWCS shall implement turf and landscape nutrient management plans on contiguous areas greater than one acre located in expanded 2020 census urban areas with a population of at least 50,000 and within the permittee's MS4 service area (Part I.E.6.r).

If nutrients are being applied to achieve final stabilization of a land disturbance project, application shall follow the manufacturer's recommendations. For newly established turf where nutrients are applied to a contiguous area greater than one acre, PWCS shall implement a nutrient management plan no later than six months after the site achieves final stabilization (Part I.E.6.s). PWCS shall implement a Department of Conservation and Recreation (DCR) approved and Nutrient Management Plan (NMP) prepared by a Certified Nutrient Management Planner (Part I.E.6.t). Fertilizer application records will be maintained with each application using the application record provided in the NMP.

Nutrient management plans that are expired as of the effective date of this permit shall be submitted to DCR for renewal within six months (May 1, 2024) after the effective date of this permit. Thereafter, all nutrient management plans shall be submitted to DCR at least 30 days prior to nutrient management plan expiration. Within 36 months (November 1, 2026) of permit coverage, no nutrient management plans maintained by PWCS in accordance with Part I.E.6.n shall be expired due to DCR documented noncompliance with 4VAC50-85-130 provided to PWCS (Part I.E.6.u).

Nutrient management plans may be maintained as a hard copy or electronically as long as the documents are available to employees at the applicable site (Part I.E.6.v).

PWCS shall provide a list of locations for which turf and landscape nutrient management plans are required in accordance with Part I.E.6.p and s, including the following information (Part I.E.6.x.(3)):

- The total acreage covered by each nutrient management plan (Part I.E.6.x.(3)(a));
- The DCR approval date and expiration date for each nutrient management plan (Part I.E.6.x.(3)(b)); and
- The location of the nutrient management plan hardcopy or electronic document being maintained (Part I.E.6.x.(3)).

Table 9: List of Lands where Nutrient Management Plans are Required

Property Name	Total Area (ac.)	DCR Approval Date	Expiration Date	Location of NMPs
Alvey E.S.	6.7	5/10/24	1/1/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Antietam E.S.	3.0	5/10/24	2/25/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Ashland E.S.	2.75	5/14/24	1/1/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Battlefield H.S.	9.91	9/18/24	6/2/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Bel Air E.S.	2.0	5/14/24	1/1/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Belmont E.S.	3.5	5/14/24	1/1/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Bennett E.S.	5.0	5/16/24	1/1/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Benton M.S.	6.5	5/23/24	1/1/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Beville M.S.	7.25	3/4/25	2/22/28	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Brentsville H.S.	6.2	5/2/25	5/4/28	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Bristow Run E.S.	4.6	8/11/25	8/2/28	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Buckland Mills E.S.	2.2	9/18/24	10/11/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Bull Run M.S.	11.9	5/23/24	4/22/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Cedar Point E.S.	3.0	9/18/24	10/11/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Chris Yung E.S.	3.5	01/16/24	01/15/28	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Coles E.S.	2.0	5/23/24	1/1/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Colgan H.S.	5.93	6/30/25	7/8/28	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Covington-Harper E.S.	4.25	8/1/25	7/15/28	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Dale City E.S.	1.0	5/23/24	1/1/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Dumfries E.S.	2.5	5/29/24	1/1/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Ellis E.S.	2.0	5/29/24	3/1/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator

Table 9: List of Lands where Nutrient Management Plans are Required

Property Name	Total Area (ac.)	DCR Approval Date	Expiration Date	Location of NMPs
Enterprise E.S.	2.62	5/29/24	1/8/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Fannie Fitzgerald E.S.	1.78	5/29/24	1/11/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Featherstone E.S.	.20	9/18/24	7/27/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Forest Park H.S.	7.39	9/18/24	7/25/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Fred Lynn M.S.	8.8	5/29/24	4/28/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Freedom H.S.	1.07	5/31/24	2/5/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Gainesville H.S.	5.34	4/03/25	4/7/28	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Gainesville M.S.	7.55	3/25/25	3/8/28	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Gar-Field H.S.	8.07	9/19/24	7/27/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Glenkirk E.S.	2.7	9/26/24	10/22/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Graham Park M.S.	3.4	6/4/24	2/13/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Gravely E.S.	3.0	5/2/25	5/13/28	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Hampton M.S.	4.8	5/25/25	3/4/28	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Haymarket E.S.	1.75	02/13/25	2/1/28	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Henderson E.S.	4.03	6/4/24	3/27/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Hylton H.S.	3.25	6/4/24	4/3/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Independence Nontraditional	.10	6/30/25	7/11/28	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Innovations E.S.	4.0	8/17/26	10/25/29	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Jenkins E.S.	4.05	6/18/26	8/15/29	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Kelly Leadership Center	5.61	5/2/25	5/5/28	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Kerrydale E.S.	1.75	10/15/24	11/1/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator

Table 9: List of Lands where Nutrient Management Plans are Required

Property Name	Total Area (ac.)	DCR Approval Date	Expiration Date	Location of NMPs
Kilby E.S.	.40	6/4/24	4/4/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
King E.S.	2.03	6/4/24	4/6/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Kyle Wilson E.S.	1.85	6/30/25	7/12/28	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Lake Ridge E.S.	.57	10/25/24	12/5/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Lake Ridge M.S.	5.05	6/6/24	4/11/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Leesylvania E.S.	2.75	6/6/24	4/13/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Loch Lomond E.S.	1.66	11/20/24	12/6/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Marshall E.S.	5.5	6/7/24	4/20/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Marstellar M.S.	8.65	3/25/25	3/7/28	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Marumsko E.S.	.40	11/20/24	12/7/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
McAuliffe E.S.	3.6	11/20/24	12/13/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Minnieville E.S.	2.0	6/7/24	4/26/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Montclair E.S.	3.1	6/7/24	5/1/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Mountain View E.S.	4.6	11/20/24	12/13/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Mullen E.S.	3.8	12/3/24	12/18/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Neabsco E.S.	2.14	6/11/24	5/16/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Occoquan E.S.	.50	6/11/24	5/21/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Old Bridge E.S.	2.9	6/11/24	5/25/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Osborn Park H.S.	5.72	3/26/25	4/1/28	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
PACE West E.S.	3.4	4/02/25	4/4/28	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Parkside M.S.	6.25	3/25/25	3/8/28	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator

Table 9: List of Lands where Nutrient Management Plans are Required

Property Name	Total Area (ac.)	DCR Approval Date	Expiration Date	Location of NMPs
Patriot H.S.	5.6	6/11/24	5/29/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Pattie E.S./Washington-Reid	3.2	12/17/24	12/19/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Penn E.S.	2.86	12/17/24	12/20/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Pennington Traditional	3.6	12/18/24	01/02/28	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Piney Branch E.S.	1.7	12/18/24	01/03/28	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Porter Traditional	2.0	6/11/24	5/29/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Potomac H.S.	3.5	9/19/24	6/28/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Potomac M.S.	5.88	4/15/25	4/11/28	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Potomac Shores M.S.	6.26	4/15/25	4/12/28	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Potomac View E.S.	.52	9/18/24	11/1/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Reagan M.S.	8.7	3/25/25	3/13/28	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Rippon M.S.	6.0	9/18/24	6/13/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
River Oaks E.S.	2.2	9/18/24	6/15/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Rockledge E.S.	.75	3/26/25	3/18/28	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Rosa Parks E.S.	2.54	12/17/24	12/21/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Saunders M.S.	6.0	9/18/24	6/18/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Signal Hill E.S.	5.0	12/18/24	1/07/28	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Sinclair E.S.	3.75	1/16/25	1/09/28	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Springwoods E.S.	1.01	9/18/24	6/20/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Sudley E.S.	1.5	1/16/25	1/17/28	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Swans Creek E.S.	4.5	9/18/24	7/9/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator

Table 9: List of Lands where Nutrient Management Plans are Required

Property Name	Total Area (ac.)	DCR Approval Date	Expiration Date	Location of NMPs
T. Clay Wood E.S.	2.4	5/27/24	5/18/28	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
The Nokesville School	2.42	6/18/26	8/24/29	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Triangle E.S.	3.5	9/18/24	7/9/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Tyler E.S.	5.35	2/13/25	1/25/28	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Unity Braxton M.S.	6.34	9/18/24	7/5/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Unity Reed H.S.	5.8	9/18/24	6/22/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Vaughan E.S.	.50	2/13/25	2/5/28	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Victory E.S.	5.07	6/18/26	8/27/29	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
West Gate E.S.	2.0	2/13/25	2/7/28	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
West Ridge E.S.	2.0	3/4/25	2/12/28	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Williams E.S.	1.25	3/4/25	2/19/28	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Woodbridge H.S.	5.67	9/18/24	7/23/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Woodbridge M.S.	4.25	9/18/24	7/17/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Woodbridge E.S.	1.80	8/26/26	8/15/29	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator
Yorkshire E.S.	2.0	9/18/24	7/27/27	14800 Joplin Rd. in Building 51 by the Landscaping Coordinator

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

Responsible individual for implementation: PWCS MS4 Stormwater Project Manager/Inspector

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.

3.1 SPECIAL CONDITIONS FOR THE CHESAPEAKE BAY TMDL

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

Description: A third phase reduction of at least 100% of the L2 Scoping Run based on lands within the 2000 and 2010 expanded Census urbanized areas required by October 31, 2028 (Part II.A.3.(iv)).

No later than October 31, 2028, PWCS shall offset 100% of the increased loads from new sources initiating construction between July 1, 2009, and October 31, 2023, and designed in accordance with 9VAC25-875 Part V (9VAC25-875-670 et seq. et seq.) if the following conditions apply (Part II.A.4):

- The activity disturbed one acre or greater (Part II.A.4.a); and
- The resulting total phosphorous load was greater than 0.45 lb./acre/year, which is equivalent to an average land cover condition of 16% impervious cover (Part II.A.4.b).

PWCS shall utilize Table 4 of Part II.A.5 to develop the equivalent pollutant load for new sources of nitrogen meeting the requirements of this condition.

No later than October 31, 2028, PWCS shall offset the increased loads from projects grandfathered in accordance with 9VAC25-875-490 that begin construction after July 1, 2019, if the following conditions apply (Part II.A.5):

- The activity disturbs one acre or greater; and
- The resulting total phosphorous load was greater than 0.45 lb./acre/year, which is equivalent to an average land cover condition of 16% impervious cover.

PWCS shall utilize Table 4 of Part II.A.5 to develop the equivalent pollutant load for grandfathered sources of nitrogen meeting the requirements of this condition.

Reductions achieved in accordance with the General VPDES Permit for Discharges of Stormwater from Small Municipal Separate Storm Sewer Systems effective July 1, 2013, and November 1, 2018, shall be applied toward the total reduction requirements to demonstrate compliance with Part II.A.3, A.4, and A.5 (Part II.A.6). 40% of L2 reductions for total nitrogen and total phosphorus shall be maintained by PWCS during the permit term (Part II.A.7). Reductions shall be achieved in each river basin as calculated in Part II.A.3 or for reductions in accordance with Part II.A.4 and A.5 in the basin in which the new source or grandfathered project occurred (Part II.A.8). Loading and reduction values greater than or equal to 10 pounds calculated in accordance with Part II.A.3, A.4, and A.5 shall be calculated and reported to the nearest pound without regard to mathematical rules of precision. Loading and reduction values of less than 10 pounds reported in accordance with Part II.A.3, A.4, and A.5 shall be calculated and reported to two significant digits (Part II.A.9).

Reductions required in Part II.A.3, A.4, and A.5 shall be achieved through one or more of the following (Part II.A.10):

- BMPs approved by the Chesapeake Bay Program (Part II.A.10.a);
- BMPs approved by the department (Part II.A.10.b); or
- A trading program described in Part II.A.11 (Part II.A.10.c).

PWCS may acquire and use total nitrogen and total phosphorus credits in accordance with § 62.1-44.19:21 of the Code of Virginia for purposes of compliance with the required reductions in Table 3a, Table 3b, Table 3c, and Table 3d of Part II.A.3; Part II.A.4; and Part II.A.5, provided the use of credits has been approved by the department. The exchange of credits is subject to the following requirements (Part II.A.11):

- The credits are generated and applied to a compliance obligation in the same calendar year (Part II.A.11.a);
- The credits are generated and applied to a compliance obligation in the same tributary (Part II.A.11.b);
- The credits are acquired no later than June 1 immediately following the calendar year in which the credits are applied (Part II.A.11.c);
- No later than June 1 immediately following the calendar year in which the credits are applied, PWCS certifies on an MS4 Nutrient Credit Acquisition Form that PWCS has acquired the credits (Part II.A.11.d); and
- Total nitrogen and total phosphorus credits shall be either point source credits generated by point sources covered by the Watershed Permit for Total Nitrogen and Total Phosphorus Discharges and Nutrient Trading in the Chesapeake Bay Watershed general permit issued pursuant to § 62.1-44.19:14 of the Code of Virginia or nonpoint source credits certified pursuant to § 62.1-44.19:20 of the Code of Virginia (Part II.A.11.e).

No later than 12 months (November 1, 2024) after the permit effective date, PWCS shall submit a third phase Chesapeake Bay TMDL Action Plan for the reductions required in Part II.A.3, A.4, and A.5. (Part II.A.12.b):

- Any new or modified legal authorities, such as ordinances, permits, policy, specific contract language, orders, and interjurisdictional agreements, implemented or needing to be implemented to meet the requirements of Part II.A.3, A.4, and A.5 (Part II.A.12.b.(1));
- The load and cumulative reduction calculations for each river basin calculated in accordance with Part II.A.3, A.4, and A.5 (Part II.A.12.b.(2));
- The total reductions achieved as of November 1, 2023, for each pollutant of concern in each river basin (Part II.A.12.b.(3));
- A list of BMPs implemented prior to November 1, 2023, to achieve reductions associated with the Chesapeake Bay TMDL, including (Part II.A.12.b.(4)):
 - The date of implementation (Part II.A.12.b.(4)(a)); and
 - The reductions achieved (Part II.A.12.b.(4)(b)).
- The BMPs to be implemented by PWCS within 60 months (November 1, 2028) of the effective date of this permit to meet the cumulative reductions calculated in Part II.A.3, A.4, and A.5, including as applicable (Part II.A.12.b.(5)):
 - Type of BMP (Part II.A.12.b.(5)(a));
 - Project name (Part II.A.12.b.(5)(b));
 - Location (Part II.A.12.b.(5)(c));
 - Percent removal efficiency for each pollutant of concern (Part II.A.12.b.(5)(d));
 - 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 (Part II.A.12.b.(5)(e)); and
 - A preliminary schedule for implementation of the BMPs included in the Chesapeake Bay TMDL action plan (Part II.A.12.b.(5)(f)).

- A summary of any comments received as a result of public participation required in Part II.A.13, PWCS's response, identification of any public meetings to address public concerns, and any revisions made to Chesapeake Bay TMDL action plan as a result of public participation (Part II.A.12.b.(6)).

Prior to submittal of the action plan required in Part II.A.12.a and b, PWCS shall provide an opportunity for public comment for no fewer than 15 days on the additional BMPs in the third phase Chesapeake Bay TMDL action plan (Part II.A.13).

Within 60 months (November 1, 2028) after permit issuance, PWCS shall update the Phase III Chesapeake Bay TMDL action plan to offset the increased loads from new sources initiating construction between July 1, 2009, and October 31, 2023, that are located in the expanded 2020 census urban areas with a population of at least 50,000, and within PWCS's MS4 service area, and designed in accordance with 9VAC25-875 Part V (9VAC25-875-670 et seq.), if the following conditions apply (Part II.A.15):

- The activity disturbed one acre or greater (Part II.A.15.a); and
- The resulting total phosphorous load was greater than 0.45 pounds per acre per year, which is equivalent to an average land cover condition of 16% impervious cover (Part II.A.15.b).

PWCS shall utilize Table 4 of Part II.A.5 to develop the equivalent nitrogen pollutant load for new sources meeting the requirements of this condition.

Within 60 months (November 1, 2028) after permit issuance, PWCS shall update the Phase III Chesapeake Bay TMDL action plan to offset the increased loads from projects grandfathered in accordance with 9VAC25-875-490 that are located in the expanded 2020 census urban areas with a population of least 50,000, and within PWCS's MS4 service area, and began construction after July 1, 2014, if the following conditions apply (Part II.A.16):

- The activity disturbs one acre or greater (Part II.A.15.a); and
- The resulting total phosphorous load was greater than 0.45 pounds per acre per year, which is equivalent to an average land cover condition of 16% impervious cover (Part II.A.15.b).

PWCS shall utilize Table 4 of Part II.A.6 to develop the equivalent nitrogen pollutant load for grandfathered sources meeting the requirements of this condition.

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

Responsible individual for implementation: PWCS MS4 Stormwater Project Manager/Inspector

Implementation schedule: No later than 12 months (November 1, 2024), PWCS shall submit a third phase Chesapeake Bay TMDL Action Plan including reductions of at least 60% of the L2 Scoping Run based on lands within the 2000 and 2010 expanded CUA. Within 60 months (November 1, 2028) PWCS shall offset the increased loads from new sources and grandfathered projects located in the expanded 2020 CUA.

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 Annual Status Report (Part II.A.14)

Description: PWCS will submit a Chesapeake Bay TMDL implementation annual status report in a method (i.e., how PWCS must submit) and format (i.e., how the report shall be laid out) as specified by the department no later than October 1 of each year. The report shall cover the previous year from July 1 to June 30 (Part II.A.14.a).

Following notification from the department of the start date for the required electronic submission of Chesapeake Bay TMDL implementation annual status reports, as provided for in 9VAC25-31-1020, such forms and reports submitted after that date shall be electronically submitted to the department in compliance with 9VAC25-31-1020 and this section. There shall be at least a three-month notice provided between the notification from the department and the date after which such forms and reports must be submitted electronically (Part II.A.14.b).

The year two Chesapeake Bay TMDL implementation annual status report shall contain a summary of any public comments on the Chesapeake Bay TMDL action plan received and how PWCS responded (Part II.A.14.c).

Each Chesapeake Bay TMDL implementation annual status report shall include the following information (Part II.A.14.d):

- A list of Chesapeake Bay TMDL action plan BMPs, not including annual practices, implemented prior to the reporting period that includes the following information for reported BMP (Part II.A.14.d.(1));
 - The number of BMPs for each BMP type (Part II.A.14.d.(1)(a));
 - The estimated reduction of pollutants of concern achieved by each BMP type and reported in pounds of pollutant reduction per year (Part II.A.14.d.(1)(b)); and
 - A confirmation statement that PWCS electronically reported Chesapeake Bay TMDL action plan BMPs inspected using the DEQ BMP Warehouse in accordance with Part III.B.5 (Part II.A.14.d.(1)(c)).
- A list of newly implemented BMPs including annual practices implemented during the reporting period that includes the following information for each reported BMP or a statement that no BMPs were implemented during the reporting period (Part II.A.14.d.(2));
 - The BMP type and a description of the location for each BMP (Part II.A.14.d.(2)(a));
 - The estimated reduction of pollutants of concern achieved by each BMP and reported in pounds of pollutant reduction per year (Part II.A.14.d.(2)(b)); and
 - A confirmation statement that PWCS electronically reported BMPs using the DEQ BMP Warehouse in accordance with Part III.B.3 (Part II.A.14.d.(2)(c)).
- If PWCS acquired credits during the reporting period to meet all or a portion of the required reductions in Part II A 3, A 4, or A 5, a statement that credits were acquired (Part II.A.14.e).
- Pollutant load reductions generated by annual practices, such as street and storm drain cleaning, shall only be applied to the compliance year in which the annual practice was implemented (Part II.A.14.f).
- The progress, using the final design efficiency of the BMPs, toward meeting the required cumulative reductions for total nitrogen and total phosphorus (Part II.A.14.g).
- Any revisions made to the Chesapeake Bay TMDL action plan (Part II.A.14.h).
- A list of BMPs that are planned to be implemented during the next reporting period (Part II.A.14.i).

Necessary documentation for implementation: Third phase Chesapeake Bay TMDL Action Plan

Responsible individual for implementation: PWCS MS4 Stormwater Project Manager/Inspector

Implementation schedule: The third phase Chesapeake Bay TMDL Action Plan Implementation Annual Report will be submitted to DEQ no later than October 1 of each year.

Measurable goal: Effectiveness will be determined by the submittal of the third phase Chesapeake Bay TMDL Action Plan Implementation Annual Status Report.

3.2 SPECIAL CONDITIONS FOR LOCAL TMDLS

Description: PWCS shall develop and maintain 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 (Part II.B.2):

- For TMDLs approved by EPA prior to July 1, 2018, and in which an individual or aggregate wasteload has been allocated to PWCS, PWCS shall develop and initiate or update as applicable the local TMDL action plans to meet the conditions of Part II.B.4, B.6, B.7, and B.8, as applicable, no later than 18 months (May 1, 2025) after the permit effective date and continue implementation of the action plan; Updated action plans shall include (Part II.B.2.a):
 - An evaluation of the results achieved by the previous action plan (Part II.B.2.a.(1)); and
 - Any adaptive management strategies incorporated into updated action plans based on action plan evaluation (Part II.B.2.a.(2)).
- For TMDLs approved by EPA on or after July 1, 2018, and prior to October 31, 2023, 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.4, B.5, B.6, B.7, and B.8, as applicable no later than 30 months (May 1, 2026) after the permit effective date (Part II.B.2.b). PWCS shall complete implementation of the TMDL action plans as determined by the schedule. 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 (Part II.B.3).

PWCS shall complete implementation of the TMDL action plans as determined by the schedule. 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 (Part II.B.3).

Each local TMDL action plan developed by PWCS shall include the following (Part II.B.4):

- The TMDL project name (Part II.B.4.a);
- The EPA approval date of the TMDL (Part II.B.4.b);
- The wasteload allocated to PWCS (individually or in aggregate), and the corresponding percent reduction, if applicable (Part II.B.4.c);
- Identification of the significant sources of the pollutants of concern discharging to the MS4 that are not covered under a separate VPDES permit. For the purposes of this requirement, a significant source of pollutants 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 (Part II.B.4.d);
- The BMPs designed to reduce the pollutants of concern in accordance with Parts II.B.5, B.6, B.7, and B.8 (Part II.B.4.e);
- Any calculations required in accordance with Part II.B.5, B.6, B.7, or B.8 (Part II.B.4.f);
- For action plans developed in accordance with Part II.B.5, B.6, and B.8, an outreach strategy to enhance the public's education (including employees) on methods to eliminate and reduce discharges of the pollutants (Part II.B.4.g); and
- A schedule of anticipated actions planned for implementation during this permit term (Part II.B.4.h).

Prior to submittal of the action plan required in Part II.B.2, PWCS shall provide an opportunity for public comment for no fewer than 15 days on the proposal to meet the local TMDL action plan requirements (Part II.B.9).

The MS4 program plan as required by Part I.B of this permit shall incorporate each local TMDL action plan. Local TMDL action plans may be incorporated by reference into the MS4 program plan provided that the program plan includes the date of the most recent local TMDL action plan and identification of the location where a copy of the local TMDL action plan may be obtained (Part II.B.9).

For each reporting period, each annual report shall include a summary of actions conducted to implement each local TMDL action plan (Part II.B.9).

BMP SC1.1 Local Bacteria TMDL Action Plans and Implementation (Part II.B.5)

Description: PWCS is a nontraditional permittee, therefore, PWCS shall select at least one strategy listed in Table 9 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.4.d (Part II.B.5.b).

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)	Provide signage to pick up dog waste, providing pet waste bags and disposal containers. Adopt and enforce pet waste ordinances or policies, or leash laws or policies. Place dog parks away from environmentally sensitive areas. Maintain dog parks by removing disposed of pet waste bags and cleaning up other sources of bacteria. Protect riparian buffers and provide unmanicured vegetative buffers along streams to dissuade stream access.
Urban wildlife	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). Install storm drain inlet or outlet controls. Clean out storm drains to remove waste from wildlife. Implement and enforce urban trash management practices. Implement rooftop disconnection programs or site designs that minimize connections to reduce bacteria from rooftops. 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).
Illicit connections or illicit discharges to the MS4	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. Implement a program to identify potentially failing septic systems. Educate the public on how to determine whether their septic system is failing. Implement septic tank inspection and maintenance program. Implement an educational program beyond any requirements in Part I.E.1 though Part I.E.6 to explain to citizens why they should not dump materials into the MS4.

Dry weather urban flows (irrigations, car washing, powerwashing, etc.)	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. Provide irrigation controller rebates. Implement and enforce ordinances or policies related to outdoor water waste. Inspect commercial trash areas, grease traps, washdown practices, and enforce corresponding ordinances or policies.
Birds (Canadian geese, gulls, pigeons, etc.)	Identify areas with high bird populations and evaluate deterrents, population controls, habitat modifications and other measures that may reduce bird-associated bacteria loading. Prohibit feeding of birds.
Other sources	Enhance maintenance of stormwater management facilities owned or operated by the permittee. Enhance requirements for third parties to maintain stormwater management facilities. 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. Provide public education on appropriate recreational vehicle dumping practices.

Necessary documentation for implementation: (1) PWCS's Local Bacteria TMDL Action Plans

Responsible individual for implementation: PWCS MS4 Stormwater Project Manager/Inspector

Implementation schedule: Update PWCS's Local Bacteria TMDL Action Plans (3) no later than 18 months (May 1, 2025) after the permit effective date and continue implementation of the action plan.

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 Local Bacteria TMDL Action Plan Implementation (Part II.B.5)

Description: PWCS will implement a strategy annually per the schedule in the Broad Run, Little Bull Run, Bull Run, Occoquan River, Neabsco Creek, and Potomac River Tributaries in Prince William County and Stafford Counties Bacteria TMDL Actions Plans.

Necessary documentation for implementation: Broad Run, Little Bull Run, Bull Run, Occoquan River, Neabsco Creek, and Potomac River Tributaries in Prince William County and Stafford Counties Bacteria TMDL Actions Plans

Responsible individual for implementation: PWCS MS4 Stormwater Project Manager/Inspector

Implementation schedule: The implementation of the Broad Run, Little Bull Run, Bull Run, Occoquan River, Neabsco Creek, and Potomac River Tributaries in Prince William County and Stafford Counties Bacteria TMDL Actions Plans will be according to the schedule in Table 11.

Table 11: Local Bacteria TMDL Action Plans Implementation		
Strategies	Method	Timeframe
Dumpster Inspections	PWCS staff or contractors will inspect dumpster areas for potential issues including illicit discharges, lids are closed, dumpsters are not leaking, and dumpsters are in good condition to prevent urban wildlife access to food sources. Dumpsters will be replaced as necessary.	Completed and ongoing
Portable Toilet Inspections	PWCS will develop an inspection checklist to document the portable toilet inspections annually.	By June 30, 2026, and inspected annually thereafter
Sanitary Sewer Overflow Standard Operating Procedures	PWCS will develop and implement a Sanitary Sewer Overflow SOP to be incorporated in the Good Housekeeping and Pollution Prevention Manual	June 30, 2027
Bacteria TMDL Training	Incorporate information concerning the dumpster inspections, portable toilet inspections, and sanitary sewer overflow SOPs into the biennial MS4 training.	June 30, 2028

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

BMP SC2.1 Sediment TMDL Action Plan and Implementation (Part II.B.6)

Description: For local sediment TMDLs (Part II.B.6):

- PWCS shall reduce the loads associated with sediment through implementation of one or more of the following (Part II.B.6.a):
 - One or more of the BMPs from the Virginia Stormwater Management Handbook listed in 9VAC25-875-590 or other approved BMPs found on the Virginia Stormwater BMP Clearinghouse website (Part II.B.6.a.(1));
 - One or more BMPs approved by the Chesapeake Bay Program. Pollutant load reductions generated by annual practices, such as street and storm drain cleaning, shall only be applied to the compliance year in which the annual practice was implemented (Part II.B.6.a.(2)); or
 - Land disturbance thresholds lower than Virginia’s regulatory requirements for erosion and sediment control and post development stormwater management (Part II.B.6.a.(3)).
- PWCS may meet the local TMDL requirements for sediment through BMPs implemented or sediment credits acquired. BMPs implemented and nutrient and sediment credits acquired to meet the requirements of the Chesapeake Bay TMDL in Part II.A may also be utilized to meet local TMDL requirements as long as the BMPs are implemented, or the credits are generated in the watershed for which local water quality is impaired (Part II.B.6.b).
- PWCS shall calculate the anticipated load reduction achieved from each BMP and include the calculations in the action plan required in Part II.B.4.f (Part II.B.6.c).
- No later than 36 months (November 1, 2026) after the effective date of this permit, PWCS shall submit to the department an update on the progress made toward achieving Accotink Creek Sediment TMDL action plan goals and the anticipated end dates by which PWCS will meet each wasteload allocation for sediment. The proposed end date may be developed in accordance with Part II.B.3 (Part II.B.6.d).

Land Conversion Efforts

PWCS’ has identified land areas that can be converted from managed turf to other landcover types throughout their properties. These projects have included no mow zones (managed turf to open space) as well as reforestation projects (managed turf to forested). Guidance Memo GM20-2003 provides quantification of sediment reductions based on land cover conversion type. In addition, PWCS has utilized land conversion locations to educate faculty and students as to the benefits of non-managed areas and their environmental benefits. Moving forward PWCS plans to continue land conversion efforts for the benefit of sediment reductions to meet the Bull Run TMDL.

Street Sweeping

PWCS has historically taken significant credit toward its street sweeping efforts, particularly under the “mass loading approach.” This approach allowed PWCS to account for the effectiveness of its street sweeping program in reducing stormwater pollution by tracking the mass of debris and contaminants collected during each sweeping operation. By using this method, PWCS was able to demonstrate a commitment to improving stormwater quality and fulfilling regulatory requirements related to pollution prevention. This credit was important in meeting environmental goals and showcasing PWCS’ dedication to maintaining clean streets and reducing the potential for contaminants entering the stormwater system.

However, with the shift in methodology from the “mass loading approach” to the “lane mile approach,” which emphasizes the length of streets swept rather than the mass of debris removed, PWCS has not formalized a structured street sweeping program that aligns with the new requirements. The change in approach has prompted the need for a reevaluation of how the PWCS measures and tracks its street sweeping efforts, as the lane mile approach involves more specific metrics related to the area covered by street sweeping operations. While PWCS has continued its street sweeping activities, the transition to the new methodology has highlighted the need for PWCS to develop a more organized and structured program that aligns with the updated standards.

Due to these challenges, PWCS has elected to discontinue the use of Street Sweeping to meet the WLA.

Resilience Plan

A Resilience Plan has been identified as a potential sediment removal technique that could be developed. A Resilience Plan could include a thorough evaluation and field assessment of potential resilience projects that have the co-benefit of sediment reduction to help meet the TMDL waste load allocation and reducing flooding within the properties. The plan, once completed, will identify resilience projects which may include outfall stabilization, stream restoration, stormwater system upgrades/repair and dredging projects. Upon completion of the Resilience Plan, PWCS could apply for grants to obtain the necessary funding to implement these projects.

Outfall Stabilization and Stream Restoration Feasibility Study

Similarly, an Outfall Stabilization and Stream Restoration Feasibility Study could be developed to assist in meeting the sediment TMDL removal rates. This document would be used to identify the extent of stream bank erosion within critical watersheds. The primary goal would be to develop a prioritization plan for future restoration activities based on observed conditions.

The assessment would include a comprehensive background investigation, including a review of historical studies focusing on stream stability and health within the school district's jurisdiction. Additionally, during field investigations, streams can be categorized into sections with similar geomorphic and hydraulic characteristics. The Bank Assessment for Non-Point Source Consequences of Sediment Index (BANCS) method would be employed to quantify the potential for stream bank scour. Visual assessments will also be conducted to evaluate accessibility, impact on adjacent properties and natural resources, and proximity to utilities. Upon completion of assessments, BANCS scores can be aggregated and mapped to reveal areas with a high potential for bank degradation. These results, along with data on costs, potential functional improvements, and public education opportunities, will inform a prioritization analysis.

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

Responsible individual for implementation: PWCS MS4 Stormwater Project Manager/Inspector

Implementation schedule: Update the Bull Run Sediment TMDL Action Plan no later than 18 months (May 1, 2025) after the permit effective date and continue implementation of the action plan.

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 and outreach strategies to enhance the public's education.

Description: PWCS will implement a step annually per the schedule in the Bull Run Sediment TMDL Action Plan.

Necessary documentation for implementation: Bull Run Sediment TMDL Action Plan

Responsible individual for implementation: PWCS MS4 Stormwater Project Manager/Inspector

Implementation schedule: The implementation of the Bull Run Sediment TMDL Action Plan will be according to the schedule in Table 12.

Table 12: Bull Run Sediment TMDL Action Plan Implementation			
Step	General Description	Measurable Goal	Completion Date
1	Programmatic Planning of Reductions	Evaluate funding for Resilience Plan Development. Continue evaluation and implementation of land use conversions. Continue education efforts as to the benefit of non-managed areas.	June 30, 2026
2	Implementation and planning of Strategies	Prepare a Resilience Plan to identify potential projects. Outfall Stabilization and Stream Restoration Feasibility Study. Assess the numerical progress toward meeting the WLA. Consider implementation of additional strategies. Continue evaluation and implementation of land use conversions. Continue education efforts as to the benefit of non-managed areas.	June 30, 2028

3	Continued Implementation and planning of Strategies. Program Evaluation.	Continue evaluation of strategies from Section 5.0. Continue evaluation and implementation of land use conversions. Continue education efforts as to the benefit of non-managed areas. Annual evaluation of practices and assessment of future efforts to meet the WLA.	June 30, 2029 – June 30, 2040
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Measurable goal: Effectiveness will be determined by the implementation of the actions in the schedule.

BMP SC3.1 PCB TMDL Action Plan and Implementation (Part II.B.7)

Description: For Polychlorinated biphenyl (PCB) TMDLs:

For each PCB TMDL action plan, PWCS shall include an inventory of potentially significant sources of PCBs owned or operated by PWCS that drains to the MS4 that includes the following information (Part II.B.7.a):

- Location of the potential source (Part II.B.7.a.(1));
- 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) (Part II.B.7.a.(2)); and
- A description of any measures being implemented or to be implemented to prevent exposure to stormwater and the discharge of PCBs from the site (Part II.B.7.a.(3)).

If at any time during the term of this permit, PWCS discovers a previously unidentified significant source of PCBs within PWCS's MS4 regulated service area, PWCS shall notify DEQ in writing within 30 days of discovery (Part II.B.7.b).

As part of its annual reporting requirements, PWCS shall submit results of any action plan PCB monitoring or product testing conducted and any adaptive management strategies that have been incorporated into the updated action plan based upon monitoring or product testing results if PWCS has elected to perform monitoring or product testing or both (Part II.B.7.c).

Necessary documentation for implementation: Tidal Potomac and Anacostia Rivers PCB TMDL Action Plan

Responsible individual for implementation: PWCS MS4 Stormwater Project Manager/Inspector

Implementation schedule: Update the Tidal Potomac and Anacostia Rivers PCB TMDL Action Plan no later than 18 months (May 1, 2025) after the permit effective date and continue implementation of the action plan.

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 and outreach strategies to enhance the public's education.

Description: PWCS will implement a step annually per the schedule in the Tidal Potomac and Anacostia Rivers PCB TMDL Action Plan.

Necessary documentation for implementation: Tidal Potomac and Anacostia Rivers PCB TMDL Action Plan

Responsible individual for implementation: PWCS MS4 Stormwater Project Manager/Inspector

Implementation schedule: The implementation of the Tidal Potomac and Anacostia Rivers PCB TMDL Action Plan will be according to the schedule in Table 13.

Table 13: Tidal Potomac and Anacostia Rivers PCB TMDL Action Plan Implementation		
Action Item	Method	Timeframe
Continued Implementation of Training	Training	Completed and ongoing
Site-specific SWPPPs for High-Priority Facilities	SWPPP developed and implemented	Completed and ongoing
MS4 Program MCMs	MCMs 1 - 4 and 6 and PWC Ordinances developed and implemented	Completed and ongoing
New discoveries previously unidentified significant sources of PCBs reported, if found	Notification to DEQ in writing within 30 days of discovery, if found	Ongoing

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

3.3 Ecosystem Restoration Projects

Description: Inspection and maintenance of ecosystem restoration projects used for TMDL compliance (Part II.C).

Within 36 months (November 1, 2026) of permit issuance PWCS shall develop and maintain written inspection and maintenance procedures in order to ensure adequate long-term operation and maintenance of ecosystem restoration projects as defined in 9VAC25-890-1 and implemented as part of a TMDL action plan developed in accordance with Part II A, B, or both. PWCS may utilize inspection and maintenance protocols developed by the Chesapeake Bay Program or inspection and maintenance plans developed in accordance with the department's Stormwater Local Assistance Fund (SLAF) guidelines (Part II.C.1).

PWCS shall inspect ecosystem restoration projects owned or operated by PWCS and implemented as part of a current TMDL action plan developed in accordance with Part II.A or Part II.B no less than once every 60 months (Part II.C.2).

Necessary documentation for implementation: (1) Post Construction Stormwater Management Inspection and Maintenance Manual

Responsible individual for implementation: PWCS Manager, Environmental Services

Implementation schedule: The Post Construction Stormwater Management Inspection and Maintenance Manual will be updated within 36 months (November 1, 2026). Currently, PWCS does not have any ecosystem restoration BMPs; therefore, inspections are not required.

Measurable goal: Effectiveness will be measured by the update of the Post Construction Stormwater Management Inspection and Maintenance Manual.

3.4 DEQ BMP Warehouse Reporting

Description: No later than October 1 of each year PWCS shall electronically report new BMPs implemented and inspected as applicable between July 1 and June 30 of each year using the DEQ BMP Warehouse (Part III.B).

PWCS shall use the associated reporting template for stormwater management facilities not reported in accordance with Part III.B.5, 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 Area Designation and Management Regulations (9VAC25-830), if applicable, and for which a General VPDES Permit for Discharges of Stormwater from Construction Activities was not required (Part III.B.1).

PWCS shall use the DEQ BMP Warehouse to report BMPs that were not reported in accordance with Part III.B.1 or B.5 and were implemented as part of a TMDL action plan to achieve nitrogen, phosphorus, and total suspended solids reductions in accordance with Part II.A or B (Part III.B.2);

PWCS shall use the DEQ BMP Warehouse to report:

- any BMPs that were not reported in accordance with Part III.B.1, B.2, or B.5 (Part III.B.3).
- the most recent inspection date for BMPs in accordance with Part I.E.5.b or 5.c, or in accordance with Part II.C and the most recent associated TMDL action plan (Part III.B.4).

The following information for each new BMP reported in accordance with Part III.B.1, B.2, B.3, or B.5 shall be reported to the DEQ BMP Warehouse as applicable (Part III.C):

- The BMP type (Part III.C.1);
- The BMPs location as decimal degree latitude and longitude (Part III.C.2);
- The acres treated by the BMP, including total acres and impervious acres (Part III.C.3);
- The date the BMP was brought online (MM/YYYY). If the date brought online is not known, PWCS shall use 06/2005 (Part III.C.4);
- The 6th Order Hydrologic Unit Code in which the BMP is located (Part III.C.5);
- Whether the BMP is owned or operated by PWCS or privately owned (Part III.C.6);
- Whether or not the BMP is part of PWCS's Chesapeake Bay TMDL action plan required in Part II.A or local TMDL action plan required in Part II B, or both (Part III.C.7);
- If the BMP is privately owned, whether a maintenance agreement exists (Part III.C.8);
- The date of PWCS's most recent inspection of the BMP (Part III.C.9); and
- Any other information specific to the BMP type required by the DEQ BMP Warehouse (e.g., linear feet of stream restoration) (Part III.C.1).

No later than October 1 of each year, PWCS shall electronically report the most recent inspection date for any existing BMP that was previously reported and re-inspected between July 1 and June 30 using the BMP Warehouse. If an existing BMP has not been previously reported, the BMP shall be reported as new in accordance with Part III.B and Part III.C (Part III.D).

No later than October 1 of each year the DEQ BMP Warehouse shall be updated if an existing BMP is discovered between July 1 and June 30 that was not previously reported to the DEQ BMP Warehouse (Part III.E).

Necessary documentation for implementation: (1) SWM Facility Inventory

Responsible individual for implementation: PWCS MS4 Stormwater Project Manager/Inspector

Implementation schedule: No later than October 1 of each year, PWCS shall electronically report the most recent inspection date for any existing BMP that was previously reported and re-inspected between July 1 and June 30 using the BMP Warehouse.

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