



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

## **Parham Campus**

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## Background and Purpose

J. Sargeant Reynolds Community College (Reynolds) owns and operates a municipal separate storm sewer system (MS4). The MS4 consists of features such as curb and gutter, drop inlets, ditches, and stormwater management facilities to convey, treat, and ultimately discharge stormwater runoff to surface waters. The discharge of runoff from the MS4 is regulated under the Clean Water Act, as amended and pursuant to the State Water Control Law and regulations adopted pursuant thereto. Reynolds is authorized to discharge stormwater runoff from the campus MS4 under the Virginia Stormwater Management Program regulations, Virginia Pollutant Discharge Elimination System Regulations (VPDES), and the Virginia State Water Control Law.

Reynolds has been issued permit coverage to discharge stormwater by the Virginia Department of Environmental Quality (DEQ) and in accordance with the General VPDES Permit for Discharges of Stormwater from Small MS4s (General Permit). Compliance with the General Permit requires Reynolds to develop, implement, and enforce an MS4 program designed to:

- Reduce the discharge of pollutants from the MS4 to the maximum extent practicable (MEP) in accordance with the General Permit,
- Protect water quality, and
- Satisfy the appropriate water quality requirements of the State Water Control Law and its attendant regulations.

The guidance document that describes how Reynolds will maintain compliance with the General Permit is this MS4 Program Plan. The Program Plan is required to include a description of the best management practices (BMPs) to address permit-specific requirements for the following minimum control measures (MCMs):

1. Public Education and Outreach
2. Public Involvement and Participation
3. Illicit Discharge Detection and Elimination
4. Construction Site Stormwater Runoff Control
5. Post-construction Stormwater Management
6. Pollution Prevention and Good Housekeeping

In addition to addressing the permit-specific requirements for the MCMs, an MS4 may also be subject to special condition requirements for total maximum daily load (TMDL) waste load allocations (WLA). General Permit Special Conditions are applicable to Reynolds for the following TMDLs for which WLAs have been assigned to Reynolds:

- ✓ Chesapeake Bay TMDL with WLAs for total phosphorus (TP), total nitrogen (TN), and total suspended solids (TSS) specified in the General Permit; and the
- ✓ TMDL Development for the Chickahominy River and Tributaries VA with a WLA for E.coli.

Implementation of the Reynolds MS4 Program Plan presented herein constitutes compliance with the standard of reducing pollutants to the MEP, provides adequate progress in meeting water quality standards, and satisfies the appropriate water quality requirements of the State Water Control Law and its attendant regulations.

### **Program Structure**

This MS4 Program Plan is structured to address each requirement in the General Permit. Specifically, for each MCM, the General Permit requires the Program Plan to include:

- ✓ Each specific requirement listed for the MCM in the General Permit;
- ✓ A description of the BMPs or strategies that Reynolds anticipates will be implemented to demonstrate compliance for each requirement;
- ✓ Standard operating procedures (SOPs) or policies necessary to implement each BMP, including a list of documents incorporated by reference, along with the version and date of the document;
- ✓ The measurable goal by which each BMP or strategy will be evaluated; and
- ✓ The persons, positions, or departments responsible for implementing each BMP or strategy to ensure permit requirements are met.

At this time, Reynolds is not dependent on another entity to implement portions of the MS4 program and the Reynolds Buildings and Grounds Manager is responsible for the implementation of each program BMP described herein. If these responsibilities change throughout the permit cycle, Reynolds will update this Program Plan to incorporate a written agreement with a description of each party's roles and responsibilities for program implementation, as required by the General Permit.

In addition to the information explicitly provided in this Reynolds MS4 Program Plan, supporting documents are also incorporated by reference and include the:

- Virginia Community College System Annual Standards and Specifications for Erosion and Sediment Control (ESC) and Stormwater Management (SWM), latest DEQ-approved version;
- Reynolds Staff Handbook of Good Housekeeping and Pollution Prevention, latest revision (includes procedures for illicit discharge detection and elimination (IDDE), good housekeeping/pollution prevention, and post-construction stormwater management (SWM) inspection and maintenance);

- SWM Facility Spreadsheet;
- Outfall and SWM facility mapping and information;
- Reynolds Bacteria TMDL Action Plan; and the
- Reynolds Phase II Chesapeake Bay TMDL Action Plan.

The latest version of the supporting documents incorporated into the Program Plan will be maintained on the Reynolds's stormwater management [webpage](#), as required per the General Permit. As part of an iterative program to reduce pollutant loadings and protect water quality to the MEP, revisions to the MS4 Program are supporting documents may occur throughout the permit cycle. Any updates to supporting documents and this Program Plan will be provided on the webpage within 30 days, as required by the General Permit.

### **Annual Reporting**

Reynolds is required by the General Permit to submit an annual report to the Virginia DEQ no later than October 1<sup>st</sup> of each year that reports on program implementation from July 1<sup>st</sup> to June 30<sup>th</sup> of the previous year. To ensure appropriate information is maintained to address permit-specific requirements for annual reporting for each MCM, reporting requirements are identified within this Program Plan for each program BMP. Reporting requirements are also included to ensure consistency with measurable goals described herein for each program BMP.

## Schedule and Roles/Responsibilities

Table 1 summarizes the critical scheduling items and responsible position or department for each BMP incorporated into this Program Plan to address the conditions of the General Permit.

**Table 1. Summary of critical time frames for implementation of each BMP.**

BMP # <sup>1</sup>	Summary of Description of Critical Item <sup>2</sup>	Timeframe
1A	Initial Public & Staff Surveys	Summer or Fall Semester 2021
1A	Outreach for high-priority issue #1	Spring, annually
1A	Outreach for high-priority issue #2	Spring and Fall, minimum of 2 weeks
1A	Outreach for high-priority issue #3	Fall, annually
1A	Follow-up Public & Staff Surveys	April 2023
2A	Maintain dedicated webpage	Ongoing per BMP description
2B	Receive/respond to public reports/input	Ongoing per BMP description
2C	Public Participation Event #1	Ongoing
2C	Public Participation Event #2	Annually, varies
2C	Public Participation Event #3	Annually in fall
2C	Public Participation Event #4	Annually in spring
3A	Update MS4 Map and Information Table	Annually, as required by BMP
3A	Maintain MS4 Map and Information Table.	Annually, by June 30
3B	Prohibition of non-stormwater discharges	Ongoing per BMP description
3C	Perform dry weather outfall screenings	Annually, by June 30
3C	Document illicit discharge occurrences	Ongoing per BMP description
4A	Implement VCCS Stnds. & Specs for ESC & SWM	Ongoing during land disturbance activity
4B	Implement VCCS Stnds. & Specs for ESC & SWM	Ongoing during land disturbance activity
5A	Implement VCCS Stnds. & Specs for ESC & SWM	Ongoing during land disturbance activity
5B	Conduct annual SWM Facility Inspections	Annually, by June 30
5C	Update SWM Facility Spreadsheet	Within 30 days of facility coming online
5D	Report to DEQ Construction Stormwater Database	Ongoing as new facility comes online
6A	Implement Good Housekeeping Procedures	Ongoing during daily operations
6B	Conduct annual campus-wide SWPPP Evaluation	Annually, by June 30
6C	Maintain Current Nutrient Management Plan	Ongoing with application of nutrients
6D	Ensure contract language for controls	For any qualifying contracts per BMP
6E	Conduct MS4 employee training	Minimum at least once every 24 months
SC1	CB TMDL Action Plan Update/Implementation	Implement annually per Action Plan
SC2	Bacteria TMDL Action Plan	Implement annually per Action Plan

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

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

<sup>2</sup> Refer to BMP section within this program plan for full description and requirements for each BMP.

## MCM 1: Public Education and Outreach

In accordance with the General Permit to address MCM 1, Reynolds will implement the following BMP:

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

Reynolds has identified 3 high priority stormwater issues to incorporate into the Reynolds public education and outreach program. For each high priority stormwater issue, a strategy to educate the target audience most likely to have stormwater impacts is selected from **Table BMP-1A-1** below, as required by the General Permit. The General Permit requires the information in **Table BMP-1A-2** to be included in this Program Plan for each identified high priority stormwater issues. For additional information regarding the Reynolds Public Education and Outreach Plan, please contact Matthew Thompson at 804.523.5795 or visit the Reynolds stormwater [webpage](#).

**Table BMP-1A-1. Strategies for Public Education and Outreach per the General Permit.**

Strategies <sup>1</sup>	Examples (provided as examples and are 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, bill boards, or storm drain stenciling
Media Materials	Information disseminated through electronic media, radio, televisions, movie theater, or newspaper
Speaking engagements	Presentations to school, church, industry, trade, special interest, or community groups
Curriculum materials	Materials developed for school-aged children, students at local colleges or universities, or extension classes offered to local citizens
Training materials	Materials developed to disseminate during workshops offered to local citizens, trade organization, or industrial officials

<sup>1</sup>Two or more of the strategies must be used each year (i.e. all strategies cannot be signage).



**Table BMP-1A-2. High-priority stormwater issues.**

High Priority Stormwater Issue	Rationale for Selection & Intended Positive Impact to Water Quality	Public Audience <sup>1</sup>	Strategy and Time Period <sup>2</sup>
1. General Public Education on: ✓ Stormwater Impacts to Surface Waters and ✓ Steps to Reduce Pollution	Selected based on the results of a survey of the public at other community colleges that found a need for general information regarding stormwater runoff impact to surface waters (i.e. 70-80% of respondents were unaware stormwater discharges into local waterways). Public knowledge of the general impacts is expected to positively impact water quality by changing habits that may have previous, and unknowingly, caused a negative impact.	Students, Faculty, & Staff	Traditional Materials (Fall)
2. Illicit Discharge Prohibition and Enforcement on the Reynolds Campus: ✓ Disciplinary Implications, ✓ Hazards, and ✓ Proper Waste Disposal	Selected due to the need to inform of the illicit discharge prohibition and enforcement mechanisms in place for the Reynolds public. Knowledge of prohibition and consequences is expected to discourage the public from willingly causing an illicit discharge and being aware of the importance for reporting suspected incidents. Increasing knowledge regarding the prohibition/enforcement of illicit discharges will minimize the potential for occurrences, thus having a positive impact on water quality.	Students, Faculty, & Staff	Signage (Provide slides on TV monitors in campus buildings)
3. Increase the applicable staff's knowledge regarding pollutants of concern for Reynolds's TMDLs WLAs.	Selected since consistent with the General Permit that specifies the public education and outreach plan prioritize reducing impacts to local impairments. Potential to contribute sediment, nutrients and bacteria via discharge from the Reynolds MS4 is most applicable to activities conducted by the grounds staff component of Reynolds's public. Increased knowledge by groups on campus most likely to have significant impacts is expected to have a positive impact on water quality by minimizing potential for TMDL pollutants to be discharged from the MS4.	Staff	Traditional Materials (Spring)

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

<sup>2</sup> May vary annually based on resources. However, a minimum of two strategy types from Table BMP-1A-1 will be implemented annually amongst the strategy types for the three high priority issues.

### **Necessary SOPs or Policy for BMP 1A**

This Program Plan and the General Permit serve as the written guidance, or policy, for implementation of this BMP. The description of this BMP defines the public education and outreach program.

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

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

- ✓ A survey incorporating questions related to: (1) stormwater impacts to surface water quality and (2) illicit discharge prohibition and enforcement to gauge progress for the high priority water quality issues #1 and #2. This survey will be distributed to the Reynolds public identified for these issues in 2021 to establish a baseline for the new public education and outreach strategies and again in the final year of the permit cycle to provide information to assess effectiveness.
- ✓ A survey incorporating questions related to TMDL pollutants of concern impacts to the Chesapeake Bay and the Chickahominy River, and tributaries, to gauge progress for the high priority water quality issue #3. This survey will be distributed to the Reynolds staff identified as the target audience for this issue during the 2021 to establish a baseline for the new public education and outreach strategy and again in the final year of the permit cycle to provide information to assess effectiveness.

Results of the surveys will be considered for determining any necessary modifications to the public education and outreach program. If necessary, changes will be made to this BMP and an updated Program Plan provided on the Reynolds stormwater website within 30 days of the modification.

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

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

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

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

In accordance with the General Permit to address MCM 2, the following BMPs will be implemented:

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

Reynolds will maintain a webpage dedicated to the Reynolds MS4 Program and stormwater pollution prevention at [http://reynolds.edu/who\\_we\\_are/about/environmental\\_sustainability/ms4.aspx](http://reynolds.edu/who_we_are/about/environmental_sustainability/ms4.aspx).

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

- ✓ A mechanism/procedure, in the form of a regularly monitored email address, or reporting form, and a hotline phone number, for the public to:
  - (1) Report potential illicit discharges, improper disposal, or spills to the MS4. The webpage will also include general information defining an MS4 and illicit discharges.
  - (2) Report complaints regarding land disturbance activities occurring on campus.
  - (3) Report other stormwater pollution concerns.
  - (4) Provide input on the Reynolds MS4 Program Plan.
- ✓ The MS4 General Permit and the DEQ MS4 General Permit coverage letter provided to Reynolds.
- ✓ The latest version of this MS4 Program Plan.
- ✓ All MS4 Annual Reports for the General Permit term. The annual reports will be posted on the webpage within 30 days of submittal to DEQ each year, or no later than November 1<sup>st</sup>.

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

This Program Plan serve as the written guidance, or policy, for implementation of this BMP. No SOPs are necessary. The webpage will facilitate the mechanism and procedures for public reporting.

### **Measurable Goal for BMP 2A Evaluation**

Effectiveness of this BMP will be measured by an annual evaluation that tracks the maintenance and updating of the webpage, as described in the BMP.

### **Annual Reporting for BMP 2A**

Annual reporting associated with this BMP shall include:

- ✓ The current Reynolds MS4 Program and stormwater pollution prevention webpage address;
- ✓ A description of updates implemented to the webpage within the reporting year; and
- ✓ Indication of the completion of an annual review of the webpage to ensure the required information to be posted is maintained and up to date.

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

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

- ✓ Reynolds staff receiving email or hotline calls regarding: (1) potential illicit discharges, (2) complaints regarding land disturbance, or (3) other stormwater pollution concerns, will maintain documentation of each report electronically for annual reporting. Documentation will include the following information for each report:
  - (1) The source of illicit discharge;
  - (2) The dates that the discharge was observed, reported, or both;
  - (3) Whether the discharge was discovered by the permittee during dry weather screening, reported by the public, or other method (describe);
  - (4) How the investigation was resolved;
  - (5) A description of any follow-up activities; and
  - (6) The date the investigation was closed.
- ✓ Reynolds staff receiving email or hotline calls regarding input or complaint on the MS4 Program Plan will maintain documentation of each report electronically for annual reporting. Documentation will include:
  - (1) The reported input or complaint, if electronically submitted or submitted in writing, or a written summary of any verbally submitted input or complaint;
  - (2) The date the input or complaint was provided;
  - (3) A description of any modification(s) to the Program Plan, if applicable, and the rationale as to why any modifications were made or not made; and
  - (4) A copy of the written response provided to the individual or group submitting the input.

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

This Program Plan serves as the written guidance, or policy, for implementation of this BMP. No SOPs are necessary. The webpage will facilitate the mechanism and procedures for public reporting.

### **Measurable Goal for BMP 2B Evaluation**

Effectiveness of this BMP will be measured by the annual percentage of: (1) closure of reported illicit discharges and (2) responses provided regarding input/complaint of regarding the program.

### **Annual Reporting for BMP 2B**

A summary of:

- ✓ Each potential illicit discharge report and percentage of reports closed;
- ✓ Each instance of public input and percent for which Reynolds provided response; and
- ✓ Assessment of any illicit discharge report or public input not addressed.

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

Reynolds has identified four public involvement activities to be implemented, along with the following information for each activity:

- ✓ A description of each activity;
- ✓ The anticipated time period each activity will occur; and
- ✓ A metric for each activity to determine if the activity is beneficial to water quality.

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

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

<b>Opportunity Types<sup>1</sup></b>	<b>Description of Activity<sup>1</sup></b>	<b>Anticipated time period<sup>1</sup></b>	<b>Metric to Measure Benefit to Water Quality</b>
1. Disposal or collection event	Paper/plastics recycling	Year round with bins around campus.	Weight of material recycled (tons/yr).
2. Educational event	Participation in Environmental Committee	TBD based on event schedule.	Measure dependent on topic of the meeting’s relationship to improving water quality.
3. Disposal or collection event	Annual Campus Clean-up Day or Community Creek Clean-up	Event during Fall Semester	Measure (weight or other appropriate measure) of collected material that otherwise could have potentially impacted water quality.
4. Pollution prevention	Implement a storm drain marking program.	Markings in place with annual maintenance in spring after winter snow operations	Measure of the fraction of storm inlets provided markings and annually maintained, as necessary. Markings are inherently anticipated to improve water quality, acting a signage to prohibit introducing illicit discharges to the MS4.

<sup>1</sup> Activities and timing may change year to year due to various circumstances. In the case of changes, this Program Plan will be updated and the revised plan provided on the Reynolds webpage within 30 days of the change.

**Necessary SOPs or Policy for BMP 2C**

This Program Plan serves as the written guidance, or policy, for implementation of this BMP. No SOPs are necessary. Table 2 of the General Permit will be utilized to select alternative public

involvement types if any of those listed in Table BMP-2C-1 cannot be implemented due to unforeseen circumstances, such as the availability of an environmental advisory committee.

### **Measurable Goal for BMP 2C Evaluation**

The metrics described in Table BMP-2C-1 will be used to evaluate the effectiveness of the public involvement activities. In the case the described metrics indicate ineffectiveness, alternative activities will be evaluated and incorporated into the Program Plan, as applicable.

### **Annual Reporting for BMP 2C**

For each public involvement activity implemented during the reporting year, annual reporting will include:

- ✓ A description of the activities;
- ✓ A report of the metric to measure the benefit to water quality; and
- ✓ An evaluation as to whether or not the activity is beneficial to improving water quality.

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

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

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

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

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

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

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

**Necessary SOPs or Policy for BMP 3A**

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

**Measurable Goal for BMP 3A Evaluation**

The MS4 map and information table serve as a tool to help track any observed or reported potential illicit discharges and ensure grounds staff is familiar with the location of the MS4 system components. To ensure the effectiveness as a tool in these capacities, the measurable goal for this BMP is a regularly updated map and information table, as described in this BMP.

**Annual Reporting for BMP 3A**

Annual reporting will include:

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



### **BMP 3B – Prohibition of Unauthorized Non-stormwater Discharges**

Reynolds will prohibit non-stormwater discharges into the storm sewer system through language provided within Reynolds’s *Standards of Conduct for Employees* and the *Student Handbook* for students, each of which provide methods and procedures for: (1) reporting and (2) corrective and disciplinary action. Methods and procedures in these two documents cover the entirety of the Reynolds public. The public, defined as students, faculty, and staff will also be made aware of the prohibition of illicit discharge and disciplinary action as part of the “Illicit Discharge Prohibition and Enforcement on the Reynolds Campus” high priority stormwater issue described in **Table BMP-1A-2** (BMP-1A).

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

This following policies are necessary for implementation of this BMP:

- ✓ Standards of Conduct for Employees
- ✓ Student Handbook

#### **Measurable Goal for BMP 3B Evaluation**

The policies prohibiting non-stormwater discharges into the storm sewer system primarily act as a deterrent for the public to purposefully cause an illicit discharge. Secondly, the policies provide a mechanism to implement corrective and disciplinary action, as necessary. For each of these purposes, measurable goals are as follows:

- ✓ A measure of the effectiveness of the BMP as a deterrent will annually be based on the number of illicit discharge instances occurring from a purposeful action by the Reynolds public during the reporting year, compared to previous years, along with consideration of any special circumstances.
- ✓ A measure of the effectiveness of the BMP as a disciplinary tool will annually be measured by an assessment of any disciplinary action taken towards a member of the Reynolds public. Assessment will be based on the effectiveness of the disciplinary action to prevent continued instances of the associated illicit discharge purposefully caused by the Reynolds public.

#### **Annual Reporting for BMP 3B**

In addition to the annual reporting described for BMP 3C for each instance of an illicit discharge, reporting will include:

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

### **BMP 3C – Maintain, Implement, Enforce IDDE Written Procedures**

Reynolds will continue to maintain, implement, and enforce IDDE written procedures designed to detect, identify, and address unauthorized non-stormwater discharges, including illegal dumping, to effectively eliminate the unauthorized discharge. The written procedures are described in the *Reynolds Staff Handbook of Good Housekeeping and Pollution Prevention* and include the following summarized items, as required by the General Permit:

- ✓ A description of the policies to eliminate ongoing sources of illicit discharges, including with the use of enforcement actions;
- ✓ Dry weather field screening protocols to detect, identify, and eliminate illicit discharges;
  - Includes annual screening of all of the MS4 outfalls; and
  - Screening data collection forms to track information required by the General Permit;
- ✓ A time frame upon which to conduct an investigation to identify and locate the source of any observed continuous or intermittent non-stormwater discharges prioritized based on potential hazard to human health;
- ✓ Methodologies to determine the source of all illicit discharges;
- ✓ Mechanisms to eliminate identified sources of illicit discharges;
- ✓ Methods for conducting a follow-up investigation in order to verify that the discharge has been eliminated; and
- ✓ A mechanism to track all investigations that include information required by the General Permit.

The *Reynolds Staff Handbook of Good Housekeeping and Pollution Prevention* will be maintained on the Reynolds MS4 Program webpage, described in BMP 2A, and is incorporated into this Program Plan, by reference.

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

This following policies are necessary for implementation of this BMP:

- ✓ Standards of Conduct for Employees
- ✓ Student Handbook

This following SOPs are necessary for implementation of this BMP:

- ✓ *Reynolds Staff Handbook of Good Housekeeping and Pollution Prevention*, incorporated into this Program Plan by reference.

#### **Measurable Goal for BMP 3C Evaluation**

The written IDDE procedures are intended to detect, identify, and eliminate illicit discharges. The measure for evaluation of this BMP will be annual assessment of the percentage of detected illicit

discharges that are identified and eliminated. In the case that a detected illicit discharge is not eliminated, the written procedures will be reviewed to determine if changes are necessary to ensure all detected illicit discharges are eliminated.

### **Annual Reporting for BMP 3C**

Annual reporting will include:

- ✓ The total number of outfalls screened during the reporting period as part of the dry weather screening program; and
- ✓ A list of illicit discharges to the MS4 including spills reaching the MS4. Each instance of illicit discharge will be documented using the *Reynolds Staff Handbook of Good Housekeeping and Pollution Prevention* to include the following information:
  - The source of illicit discharge;
  - The dates that the discharge was observed, reported, or both;
  - Whether the discharge was discovered by the permittee during dry weather screening, reported by the public, or other method (describe);
  - How the investigation was resolved;
  - A description of any follow-up activities; and
  - The date the investigation was closed.
- ✓ An annual assessment of the percentage of detected illicit discharges that are eliminated, including any necessary modification(s) needed for the *Reynolds Staff Handbook of Good Housekeeping and Pollution Prevention* for cases where a detected illicit discharge was not eliminated. A schedule for completing any modification will also be provided.

## **MCM 4: Construction Site Stormwater Runoff Control**

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

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

As a public institution of higher education, Reynolds will address discharges entering the MS4 from regulated construction site runoff with continued implementation of the latest DEQ-approved *Virginia Community College System (VCCS) Annual Standards and Specifications for Erosion and Sediment Control (ESC) and Stormwater Management (SWM)*. DEQ's approval of the VCCS Annual Standards and Specifications for ESC and SWM ensures consistency with the:

- ✓ Virginia ESC Law (§ 62.1-44.15:51 et seq. of the Code of Virginia); and the
- ✓ Virginia ESC Regulations (9VAC25-840).

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

- ✓ *VCCS Annual Standards and Specifications for ESC and SWM* that includes:
  - A description of the policies to ensure compliance to Virginia ESC Laws and Regulations;
  - Written inspection procedures to ensure the erosion and sediment controls are properly implemented and all associated documents utilized during inspection, including the inspection schedule;
  - Written procedures for requiring compliance through corrective action or enforcement action to the extent allowable; and
  - Roles and responsibilities in implementing the standards and specifications.
- ✓ Copy of the most recent standards and specifications approval letter from DEQ.

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

The latest DEQ-approved *VCCS Annual Standards and Specifications for ESC and SWM* define the necessary SOPs and policies for implementation of this BMP.

### **Measurable Goal for BMP 4A Evaluation**

In context to MCM 4, the *VCCS Annual Standards and Specifications for ESC and SWM* are intended to ensure land disturbance activity is compliant to the Virginia ESC Law and Regulations referenced in this BMP's description. With this, effectiveness will be measured with an annual review of all land disturbance activities to ensure each has been conducted in accordance with the current DEQ-approved

standards and specifications for ESC. At a minimum, the review will determine if applicable land disturbance activities:

- ✓ Have an approved ESC Plan;
- ✓ Obtained a Construction General Permit when disturbance is  $\geq$  1-acre; and
- ✓ Have had inspections and enforcement performed as specified by the *VCCS Annual Standards and Specifications for ESC and SWM*.

#### **Annual Reporting for BMP 4A**

Annual reporting will include:

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

### **BMP 4B –Controls to Prevent Non-stormwater Discharges during Land Disturbance**

Reynolds will 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 of the MS4. The requirement for appropriate controls to prevent non-stormwater discharges during land disturbing activity is implemented by Reynolds through implementation of the *VCCS Annual Standards and Specifications for ESC and SWM*. Specifically, Section 3.3.1 of the standards and specifications requires:

- ✓ The implementation of a site-specific stormwater pollution prevention plan (SWPPP), as required by the General Permit for Discharges from Construction Activity (9VAC25-880) for land disturbance activity  $\geq$  1-acre.

The *VCCS Annual Standards and Specifications for ESC and SWM* require a preconstruction meeting prior to land disturbance, with the completion of ***Form LD-03: VCCS Land Disturbance Preconstruction Meeting Form***. The form requires verification of the availability of the site's SWPPP, when applicable. To ensure SWPPP implementation, ***Form LD-04B: VCCS Construction Site Inspection Certification Form*** is provided in the standards and specifications and used for land disturbance activity inspections. The form includes inspection items related to pollution prevention and the SWPPP.

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

The latest DEQ-approved *VCCS Annual Standards and Specifications for ESC and SWM* define the necessary SOPs and policies for implementation of this BMP.

### **Measurable Goal for BMP 4B Evaluation**

The effectiveness of this BMP will be measured by an assessment of the number of illicit discharges annually observed or reported that originate from land disturbance activity. In the case of continued similar occurrences, the related sections of the standards and specifications will be reviewed in context to the occurrence(s) for potential modifications to prevent future occurrences.

### **Annual Reporting for BMP 4B**

The following will be reported in association with this BMP:

- ✓ The total number of illicit discharges originating from land disturbance activity, provided in reporting for BMP 3C; and
- ✓ Any potential changes to the subsequent annual standards and specifications to prevent future occurrences.

## **MCM 5: Post-construction SWM for Development**

In accordance with the General Permit to address MCM 5, the following BMPs will be implemented:

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

As a public institution of higher education, Reynolds will address post-construction stormwater runoff that enters the MS4 from land disturbing activities with continued implementation of the latest DEQ-approved *VCCS Annual Standards and Specifications for ESC and SWM*. DEQ's approval of the *VCCS Annual Standards and Specifications for ESC and SWM* ensures consistency with the:

- ✓ Virginia SWM Act (§ 62.1-44.15:24 et seq. of the Code of Virginia); and the
- ✓ Virginia SWM Program Regulations (9VAC25-870).

The following will be maintained on the Reynolds MS4 Program [webpage](#), described in BMP 2A, and are incorporated into this Program Plan, by reference:

- ✓ *VCCS Annual Standards and Specifications for ESC and SWM* that include:
  - A description of the policies to ensure compliance with the Virginia SWM Act and Regulations;
  - Written inspection procedures to ensure SWM facilities are properly designed and constructed; and
  - Roles and responsibilities in implementing the standards and specifications.
- ✓ A copy of the most recent standards and specifications approval letter from DEQ.

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

The latest DEQ-approved *VCCS Annual Standards and Specifications for ESC and SWM* define the necessary SOPs and policies for implementation of this BMP.

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

In context to MCM 5, the *VCCS Annual Standards and Specifications for ESC and SWM* are intended to ensure land disturbance activity is compliant to the Virginia SWM Law and Regulations referenced in this BMP's description. With this, effectiveness will be measured with an annual review of all land disturbance activities to ensure each has been conducted in accordance with the current DEQ-approved standards and specifications for SWM. At a minimum, the review will determine if applicable land disturbance activities have:

- ✓ An approved SWM Plan for land disturbance activity  $\geq 2,500$  square feet, consistent with Henrico County's land disturbance definition in the County's SWM Code, Section 10-28;
- ✓ A SWM facility record drawing was provided upon completion of the project; and
- ✓ A post-construction inspection and maintenance plan is available for each SWM facility.

### **Annual Reporting for BMP 5A**

Annual reporting will include:

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



### **BMP 5B – Implement Inspection & Maintenance Program for SWM Facilities**

Reynolds will continue to implement an inspection and maintenance program for Reynolds’s SWM facilities, as described in the *Reynolds Staff Handbook of Good Housekeeping and Pollution Prevention* and will continue to inspect all SWM facilities annually, at a minimum.

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

- ✓ *Reynolds Staff Handbook of Good Housekeeping and Pollution Prevention* that includes:
  - Written inspection procedures and all associated documents utilized during inspection of SWM facilities;
  - Written maintenance procedures; and
  - Roles and responsibilities in implementing the post-construction stormwater runoff control program.

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

The written procedures described within the latest version of the *Reynolds Staff Handbook of Good Housekeeping and Pollution Prevention* define the necessary SOPs and policies for implementation of this BMP.

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

The effectiveness of this BMP will be measured by the annual completion of BMP inspection forms and timeliness of conducting any necessary maintenance identified on inspection forms in accordance with the guidance in the *Reynolds Staff Handbook of Good Housekeeping and Pollution Prevention*.

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

Annual reporting will include:

- ✓ The total number of inspections (completed forms) conducted on each of Reynolds’s SWM facilities;
- ✓ A description of the significant maintenance, repair, or retrofit activities performed on each SWM facility, if any, to ensure it continues to perform as designed. This does not include routine activities such as grass mowing or trash collection; and
- ✓ Summary of timelines for addressing any significant maintenance identified during inspections.

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

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

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

Reynolds will update the SWM facility spreadsheet within 30 days of any new SWM facility coming online. The SWM facility spreadsheet, incorporated into this plan by reference, and available at the Reynolds stormwater [webpage](#).

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

The written procedures described within the latest version of the *Reynolds Staff Handbook of Good Housekeeping and Pollution Prevention* define the necessary SOPs and policies for implementation of this BMP.

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

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

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

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

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

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

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

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

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

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

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

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

Annual reporting will include:

- ✓ A confirmation statement that either: (1) Reynolds submitted SWM facility information through the Virginia Construction Stormwater General Permit database for those land disturbing activities for which coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities was required in accordance with the VCCS Standards and Specifications for ESC and SWM or (2) Reynolds did not complete any projects requiring coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities.
  - If information was not submitted, an explanation as to why with a schedule for submission of the required information.

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

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

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

Reynolds will continue to implement the good housekeeping/pollution prevention written procedures for the Reynolds's facilities, as described in the *Reynolds Staff Handbook of Good Housekeeping and Pollution Prevention*. The procedures in the existing program manual are design to:

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

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

- ✓ *Reynolds Staff Handbook of Good Housekeeping and Pollution Prevention* that includes the written procedures for the operations and maintenance activities that may occur on the Reynolds campus.

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

The written procedures described within the latest version of the *Reynolds's Staff Handbook of Good Housekeeping and Pollution Prevention* define the necessary SOPs and policies for implementation of this BMP.

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

The objective of the good housekeeping/pollution prevention written procedures is to minimize or prevent pollutant discharges originating from campus operations and maintenance activities. The effectiveness of this BMP will be measured by an assessment of the number of illicit discharges

annually observed or reported that originate from campus operations and maintenance activities. In the case of continued occurrence, the related sections of the *Reynolds Staff Handbook of Good Housekeeping and Pollution Prevention* will be reviewed in context to the occurrence(s) for potential modifications to prevent future occurrences.

### **Annual Reporting for BMP 6A**

The following will be reported in association with this BMP:

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

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

The General Permit requires Reynolds to maintain and implement a stormwater pollution prevention plan for high priority facilities that have high potential of discharging pollutants. According to the General Permit, high priority facilities that have high potential of discharging pollutants include any of the following materials or activities occurring within the Reynolds’s regulated area and are expected to have exposure to stormwater, resulting from rain, snow, snowmelt or runoff:

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

Reynolds does not currently trigger any of the criteria listed to require a SWPPP. Reynolds will annually assess the criteria described above to determine if a SWPPP may become required due to changes in material storage or applicable activities.

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

This Program Plan and the General Permit serve as the written guidance, or policy, for implementation of this BMP. No SOPs are necessary since a SWPPP is not applicable to Reynolds at this time.

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

Completion of an annual assessment to determine if activities or storage of materials on the Reynolds campus triggers the criteria for designation of a high priority facility that has high potential for discharging pollutants.

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

Reynolds will report the results of the annual campus assessment to determine if a SWPPP is required.

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

Reynolds lands are regulated under § 10.1-104.4 of the Code of Virginia that requires implementation of nutrient management plans (NMPs). Reynolds will continue to maintain compliance with this statutory requirement. NMPs will be developed by a certified turf and landscape nutrient management planner in accordance with § 10.1-104.2 of the Code of Virginia. At a minimum, NMPs will be applicable to all contiguous areas  $\geq$  1-acre where nutrients are applied. Reynolds's NMPs are incorporated, by reference, into this Program Plan.

The current Reynolds NMP is made available on the Reynolds MS4 Program webpage, described in BMP 2A, and incorporate the following items required for inclusion of this Program Plan:

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

In an effort to mitigate nutrient loadings to the MS4, Reynolds will also continue a policy of not applying deicing agents containing urea or other forms of nitrogen or phosphorus to campus parking lots, roadways, sidewalks, or other paved surfaces.

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

DCR-approved NMPs for the campus.

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

The objective of the NMP is to ensure appropriate application of nutrients to minimize nutrient loadings to the MS4s. Effectiveness will be based on the completeness of the application records incorporated into the NMP and adherence to the plan's application guidance.

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

Annual reporting for this BMP will include:

- ✓ Locations and total acreage for where the NMPs apply; and the
- ✓ Date of the latest DCR approval for the NMP for the campus.

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

Reynolds will require contractors employed by Reynolds that are to engage in activities with the potential to discharge pollutants to the MS4 use appropriate control measures to minimize the discharge of pollutants. Reynolds will implement this BMP with the use of contractor language as the mechanism to ensure contractors implement necessary good housekeeping and pollution prevention controls. Implementation of this BMP will include the following during the course of procuring a contract:

- ✓ Determination if the activity has potential to result in discharge of pollutants to the MS4; and
- ✓ Identification of appropriate controls to minimize potential pollutant discharges, if applicable.

In the case that the activity is deemed to have potential to result in discharge of pollutants to the MS4, language will be incorporated into the contract with the contractor that requires the use of the appropriate controls identified during the procurement process, or others deemed necessary by Reynolds if the identified controls are ineffective during the course of the activity. At a minimum, the contractor will be required to implement procedures and controls described in the *Reynolds Staff Handbook of Good Housekeeping and Pollution Prevention*, described in BMP 6A.

For contractors applying pesticides or herbicides, Reynolds will ensure contract language requires applicators be certified in accordance with the Virginia Pesticide Control Act (§ 3.2-3900 et seq. of the Code of Virginia).

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

The necessary policies for implementation of this BMP are this Program Plan and the *Reynolds Staff Handbook of Good Housekeeping and Pollution Prevention*. Necessary SOPs will be defined in specific contract language for any individual activities procured that have potential to result in discharge of pollutants to the MS4.

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

The objective of the BMP is to minimize or prevent pollutant discharges originating from contractor activities. The effectiveness of this BMP will be measured by an assessment of the number of illicit discharges annually observed or reported that originate from contractor activities.

#### **Annual Reporting for BMP 6D**

Annual reporting for this BMP will include:

- ✓ The number of illicit discharges originating from contractor activities.
- ✓ Summary of assessment to modify procurement procedures to prevent future instances.



### **BMP 6E – Training Plan for Applicable Employees**

Reynolds will continue implementing Reynolds’s Good Housekeeping/Pollution Prevention Training Plan that is incorporated into the *Reynolds Staff Handbook of Good Housekeeping and Pollution Prevention*.

Training will occur, at a minimum, once per 24 months and include training, as incorporated into the *Reynolds Staff Handbook of Good Housekeeping and Pollution Prevention*, which addresses:

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

Training will be in the form of a designated meeting session that will incorporate a PowerPoint and the *Reynolds Staff Handbook of Good Housekeeping and Pollution Prevention*. The following Reynolds staff will be required to participate in training events:

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

For any employees applying pesticides or herbicides, Reynolds will ensure the applicator(s) be certified in accordance with the Virginia Pesticide Control Act (§ 3.2-3900 et seq. of the Code of Virginia).

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

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

The necessary policies for implementation of this BMP are this Program Plan BMP and the *Reynolds Staff Handbook of Good Housekeeping and Pollution Prevention*.

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

The objective of the BMP is to educate applicable Reynolds staff in: (1) recognition, reporting, and prevention of illicit discharges and (2) good housekeeping/pollution prevention practices to prevent

nonstormwater discharges from activities performed on Reynolds campus. To measure the effectiveness of the Reynolds training, a quiz will be provided at the end of each training session to assess the information obtained by the trainees. The BMP will be considered effective when average scores exceed 80%. If average scores are less than 80%, modification to the training plan will be considered for subsequent training events.

### **Annual Reporting for BMP 6E**

This BMP will include the following annual reporting items:

- ✓ The date of the most recent training event;
- ✓ The date of the prior training event (to ensure within 24 months);
- ✓ The number of employees who attended the most recent training event;
- ✓ The objective of the training event; and
- ✓ The average quiz scores from the training event. If quiz scores average less than 80%, a summary will be report of the assessment of the training event with any necessary modifications to be incorporated into future training to improve teaching of the materials.

## **Special Conditions for Total Maximum Daily Load Waste Load Allocations**

General Permit Special Conditions are applicable to Reynolds for the following TMDL for which a WLA has been assigned to Reynolds:

- ✓ Chesapeake Bay TMDL with WLAs for total phosphorus (TP), total nitrogen (TN), and total suspended solids (TSS) specified in the General Permit; and the
- ✓ TMDL Development for the Chickahominy River and Tributaries VA with a WLA for E.coli.

To address TMDL Special Conditions, Reynolds will implement the following BMPs:

### **BMP SC1 – Action Plan for the Chesapeake Bay TMDL**

Reynolds will continue implementation of the *Reynolds Phase II Chesapeake Bay TMDL Action Plan*, latest revision October 28, 2019, towards achieving the required sediment, phosphorus and nitrogen reductions described in the Action Plan. The latest version of the Action Plan will be maintained on the Reynolds stormwater webpage described in BMP 2A.

### **Necessary SOPs or Policies for BMP SC1**

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

- ✓ *Reynolds Phase II Chesapeake Bay TMDL Action Plan*, latest version, incorporated to this Program Plan by reference.

### **Measurable Goal for BMP SC1 Evaluation**

As a measurable goal, Reynolds will provide quantitative measures of the amount of sediment, phosphorus and nitrogen annually removed as a result of implementation of the *Reynolds Phase II Chesapeake Bay TMDL Action Plan*.

### **Annual Reporting for BMP SC1**

Reynolds will annually report on the status of implementation of the *Reynolds Phase II Chesapeake Bay TMDL Action Plan*, including:

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

### **BMP SC2 – Action Plan for the Chickahominy River and Tributaries Bacteria TMDL**

Reynolds will continue implementation of the *Reynolds Bacteria TMDL Action Plan*, latest revision April 30, 2020, towards achieving the required bacteria (*Escherichia coli*) reductions described in the Action Plan. The latest version of the Action Plan will be maintained on the Reynolds stormwater webpage described in BMP 2A.

#### **Necessary SOPs or Policies for BMP SC1**

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

- ✓ *Reynolds Bacteria TMDL Action Plan*, latest version, incorporated to this Program Plan by reference.

#### **Measurable Goal for BMP SC1 Evaluation**

As a measurable goal, Reynolds will provide qualitative measures, and quantitative measures, when possible, associated with strategy implementation as described in Table 1 of the *Reynolds Bacteria TMDL Action Plan*.

#### **Annual Reporting for BMP SC1**

Reynolds will annually report on the status of implementation of the *Reynolds Bacteria TMDL Action Plan*, including:

- ✓ Summary of actions conducted to implement the action plan;
- ✓ A list of BMPs to be implemented the following reporting year; and
- ✓ Any revisions made to the Action Plan during the reporting year.