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# NOVA

**Northern Virginia  
Community College**

Alexandria, Annandale,  
Loudoun, & Woodbridge Campuses

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## Municipal Separate Storm Sewer System Program Plan

For

General Permit No. VAR040095

During

Permit Year 2024 - 2025

From November 1, 2023, until October 31, 2028, in accordance with the VAR04 General Permit Northern Virginia Community College 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.

May 30, 2024

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## ACRONYMS

BMP	Best Management Practice
DCR	Virginia Department of Conservation and Recreation
DEQ	Virginia Department of Environmental Quality, “the department”
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
SLAF	Stormwater Local Assistance Fund
SWM	Stormwater Management
SWPPP	Stormwater Pollution Prevention Plan
TMDL	Total Maximum Daily Load
VCCS	Virginia Community College System
VCCS S&S	Virginia Community College System Standards and Specifications
VPDES	VAR04 General Virginia Pollutant Discharge Elimination System Permit for Discharges of Stormwater from Small Municipal Separate Storm Sewer Systems
VCACS	Virginia Department of Agriculture and Consumer Services
VESCP	Virginia Erosion and Sediment Control Program
VSMA	Virginia Stormwater Management Act
VSMP	Virginia 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" 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 NOVA 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 NOVA 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.

"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; and
- 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 Northern Virginia Community College.

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

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

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

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

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

"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 NOVA'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 NOVA 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 NOVA 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)**

NOVA 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 the 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 NOVA determines if a wasteload allocation (WLA) has been assigned to NOVA within an approved TMDL and to provide public opportunity for participation in development of new TMDL Action Plans and revisions to existing TMDL Action Plans.

NOVA is subject to the Special Conditions of the Neabsco Creek Bacteria TMDL, Accotink Creek Sediment TMDL and Upper Accotink Creek Chloride 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 NOVA will meet the sediment wasteload allocation in accordance with the deadline provided Table 1.

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

Each BMP lists the individual(s) responsible for implementation. At NOVA, the Manager, Environmental Services implements the MS4 Program Plan and reports to the Chief Facilities Officer who is the signatory authority in accordance with Part IV.K. The Chief Facilities Officer reports to the Vice President for Finance and Administrative Services. The Vice President reports to the President of the College who reports to the Chancellor of the Virginia Community College System. NOVA utilizes the Virginia Community College System (VCCS) to implement portions of the MS4 Program Plan, specifically MCM 4 concerning land disturbing activities. The VCCS Standards and Specification DEQ approval letter is provided in Appendix A (Part I.C.1.b). The VCCS is NOVA's ESC and plan approving authority. The VCCS implements Standards and Specifications approved by DEQ which are incorporated by reference. See Section 1.5 for the list of the most recent date of the VCCS Standards and Specification.

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

NOVA 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 NOVA'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. NOVA 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*, April 2024
- *Good Housekeeping and Pollution Prevention Manual*, April 2024
- *Post-Construction Stormwater Management Inspection & Maintenance Manual*, April 2024
- *Phase III Chesapeake Bay TMDL Action Plan (2023 - 2028 General Permit)*, October 2023
- *Neabsco Creek Bacteria TMDL Action Plan (2018 – 2023 MS4 General Permit)*, October 2022
- *Nutrient Management Plan*, July 15, 2024
- *VCCS Standards and Specifications*, March 2021
- *Accotink Creek Sediment TMDL Action Plan (2018 – 2023 MS4 General Permit)*, October 2022
- *Accotink Creek Chloride TMDL Action Plan (2018 – 2023 MS4 General Permit)*, April 2021
- *Outfall Information Table*, April 2024
- *SWM Facility Tracking Database*, April 2024
- *Public Education and Outreach Survey*, April 2019

### **1.6 Annual Reporting (Part I.D)**

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

- NOVA shall submit an annual report to the department no later than October 1 of each year in a method, (i.e., how NOVA 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):
  - NOVA, 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, NOVA 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, annual 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.

<b>Table 1: Schedule for Program Implementation.</b>		
<b>Annual Schedule</b>		
<b>BMP / Regulation</b>	<b>Necessary Action</b>	<b>Timeline*</b>
6.5 / Part I.E.6.k	Review and Update SWPPP After an Unauthorized Discharge, Release or Spill Reported, if Applicable	<b>30 Days (Review), and 90 Days (Update)</b>
6.6 / Part I.E.6.s	Implement a Nutrient Management Plan After Final Stabilization of a Land Disturbance Project	<b>6 Months After Final Stabilization</b>
6.6 / Part I.E.6.u	Nutrient Management Plans Submitted to DCR	<b>30 Days Prior to Expiration</b>
SC3.1 / Part II.B.7	Notify DEQ in Writing of a Previously Unidentified Significant Source of PCBs within the MS4 Area	Not Applicable 30 Days of Discovery
2.2 / Part I.E.2.d	Implement Four Public Involvement and Participation Activities	<b>June 30</b>
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	<b>June 30 (Review) and December 31 (Develop)</b>
3.1 / Part I.E.3.a.(5)	Update MS4 Map, Information Table, and Check for Any Approved TMDLs	<b>October 1</b>
3.4 / Part III.B, D, & E	Report BMPs Implemented and Inspected Using DEQ BMP Warehouse	<b>October 1</b>
1.6 & CB-SC.2 / Part I.D	Submit Annual Report and Chesapeake Bay TMDL Implementation Annual Status Report	<b>October 1</b>
2.1 / Part I.E.2.b.(3)	Post Annual Report and Chesapeake Bay TMDL Implementation Annual Status Report on the Stormwater Webpage	<b>November 1 (30 Days After October 1)</b>
<b>Permit Cycle Schedule</b>		
<b>BMP/Regulation</b>	<b>Necessary Action</b>	<b>Timeline*</b>
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	Not Applicable May 1, 2024 (6 months)
1.4 / Part 1.C.3	Update the MS4 Program Plan	Completed May 1, 2024 (6 months)

<b>Permit Cycle Schedule</b>		
<b>BMP / Regulation</b>	<b>Necessary Action</b>	<b>Timeline*</b>
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	<b>November 1, 2024 / 15 days (12 months)</b>
6.5 / Part I.E.6.g	Identify Any New High-Priority Facilities within Expanded 2020 CUA	<b>November 1, 2024 (12 months)</b>
6.6 / Part I.E.6.q	Identify Areas within Expanded 2020 CUA Requiring Nutrient Management Plans	Not Applicable November 1, 2024 (12 months)
SC1.1, SC1.2 & SC2.1 & SC2.2 / Part II.B.2.a	Update Neabsco Creek Bacteria, Accotink Creek Sediment and Upper Accotink Creek Chloride TMDL Action Plan as Applicable / Public Comment Period Prior to Submittal to DEQ	<b>May 1, 2025 / 15 days (18 months)</b>
6.4 / Part I.E.6.d	Conduct GHPP/IDDE Training	<b>June 30, 2025 (Once per 24 months)</b>
3.1 / Part I.E.3.a.(1)	Update MS4 Map	<b>November 1, 2025 (24 months)</b>
3.1 / Part I.E.3.a.(3)	Submit GIS Geodatabase or Shapefiles of Outfalls and MS4 Area with Attribute Tables	<b>November 1, 2025 (24 months)</b>
6.1 / Part I.E.6.b.(1)(a)	Update Anti-icing and Deicing GHPP Procedures	<b>November 1, 2025 (24 months)</b>
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	<b>May 1, 2026 / 15 days (30 months)</b>
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	<b>November 1, 2026 / 15 days (36 months)</b>
SC3.1 / Part II.B.8.a	Develop an Anti-icing and Deicing Agent Education and Outreach Strategy for Chloride TMDLs / Public Comment Period Prior to Submittal to DEQ	<b>November 1, 2026 / 15 days (36 months)</b>
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	<b>November 1, 2026 / 15 days (36 months)</b>
6.6 / Part I.E.6.r	Develop and Implement Nutrient Management Plans on Areas within the Expanded 2020 CUA.	<b>November 1, 2026 (36 months)</b>

<b>Permit Cycle Schedule</b>		
<b>BMP / Regulation</b>	<b>Necessary Action</b>	<b>Timeline*</b>
6.6 / Part I.E.6.u	No Nutrient Management Plans Expired	<b>November 1, 2026 (36 months)</b>
6.1 / Part I.E.6.b.(2)	Update Renovation and Significant Exterior Maintenance GHPP Procedures	<b>November 1, 2026 (36 months)</b>
6.5 / Part I.E.6.h	Develop and Implement New High Priority Facility SWPPP(s), if Applicable	<b>November 1, 2026 (36 months)</b>
3.3 / Part II.C.1	Develop and Maintain Written Inspection and Maintenance Procedures for Ecosystem Restoration Projects	<b>November 1, 2026 (36 months)</b>
6.4 / Part I.E.6.d	Conduct GHPP/IDDE Training	<b>June 30, 2027 (Once per 24 months)</b>
3.3 / Part II.C.2	Inspect Ecosystem Restoration Projects Implemented as Part of a Current TMDL Action Plan	Not Applicable 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	<b>November 1, 2028 (60 months)</b>
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	<b>November 1, 2028 (60 months)</b>
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.	<b>November 1, 2028 (60 months)</b>

\*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 NOVA 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:** NOVA 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.

NOVA 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)).

NOVA 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).

NOVA 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).

NOVA may identify staff, students, members of the general public, and other users of facilities operated by NOVA 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)).

<b>Strategies</b>	<b>Examples (not meant to be all inclusive or limiting)</b>
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 NOVA's anticipated Public Education and Outreach Activities for the permit year are in Table 3.

<b>#</b>	<b>High Priority Stormwater Issue</b>	<b>Strategy</b>	<b>Communication</b>	<b>Anticipated Time Period</b>
1	Public education on stormwater runoff	Traditional Written Materials	Brochure sent via email	Spring or Summer Semester 2025
2	TMDLs and Local Impaired Waters	Signage	Storm Drain Marking on one or more campuses	Spring or Summer Semester 2025
3	Good Housekeeping and Pollution Prevention	Traditional Written Materials	Parking Lot Flyer on bulletin boards on one or more campuses	Spring or Summer Semester 2025

Below is a list of high-priority stormwater issues NOVA 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: Public education on stormwater runoff**

Rationale (Part I.E.1.f.(2)): This issue was selected based on the results of the public survey that indicate a strong need for increased knowledge on the steps to reduce stormwater pollution.

Target Audience (Part I.E.1.f.(3)): NOVA's public audience is approximately 73,000 students and 4,200 faculty and staff. A portion of those students, faculty and staff visit campuses regularly.

Strategy to Communicate High Priority Stormwater Message (Part I.E.1.f.(7)): An email sent to the entire target audience that includes an informational brochure with the relevant message and a link to the NOVA stormwater webpage.

Relevant Message (Part I.E.1.f.(7)): To address goals of the Program and concerns stemming from the survey results, the relevant message will include: information regarding NOVA's stormwater program and how stormwater facilities reduce stormwater pollution.

Time Period (Part I.E.1.f.(8)): The informational brochure will be emailed in the Spring or Summer within the permit year.

Measurable Goal (Part I.E.1.i.(7)): The informational brochure will be emailed to all students, faculty, and staff once during the permit year.

### **High Priority Stormwater Issue No. 2: TMDLs and Local Impaired Waters**

Rationale (Part I.E.1.f.(2)): Survey results indicate that 73% percent of the public audience does not know that storm inlets on the campus drain straight to local waterways. The fact that stormwater flows from properties into a storm drain and via the storm sewer system to an outfall into a waterway is fundamental knowledge needed to understand how local waterways can become impaired and require a TMDL.

Target Audience (Part I.E.1.f.(3)): NOVA's public audience is approximately 73,000 students and 4,200 faculty and staff. A portion of those students, faculty and staff visit campuses regularly.

Strategy to Communicate High Priority Stormwater Message (Part I.E.1.f.(7)): NOVA's students, faculty and staff park their vehicles in parking lots where they are likely to see the storm drain markers. Due to snow operations, the storm drain markers can be removed; and therefore, need to be replaced regularly.

Relevant Message (Part I.E.1.f.(7)): A simple message is conveyed on the storm drain markers to prevent intentional pollution and awareness of the fact that storm inlets drain directly to waterways such as: No dumping. Drains to a local waterway.

Time Period (Part I.E.1.f.(8)): The storm drain marker installation will be completed in the Spring or Summer within the permit year.

Measurable Goal (Part I.E.1.i.(7)): Storm drain markers will be installed and visible to NOVA's public that visits one or more of the campuses within the permit year.

### **High Priority Stormwater Issue No. 3: Good Housekeeping and Pollution Prevention**

Rationale (Part I.E.1.f.(2)): The survey indicated that the top stormwater pollution concern that negatively impacted a local waterway near campus was petroleum products.

Target Audience (Part I.E.1.f.(3)): NOVA's public audience is approximately 73,000 students and 4,200 faculty and staff. A portion of those students, faculty and staff visit campuses regularly.

Strategy to Communicate High Priority Stormwater Message (Part I.E.1.f.(7)): Flyers will be placed on bulletin boards in highly visible and frequently traveled areas by students, faculty and staff.

Relevant Message (Part I.E.1.f.(7)): The message conveyed on the posters is that parking lot storm inlets drain directly to waterways, actions NOVA's public can take to improve the quality of stormwater runoff by repairing vehicle leaks promptly and contact information to report a discharge.

Time Period (Part I.E.1.f.(8)): The flyers will be installed in the Spring or Summer within the permit year.

Measurable Goal (Part I.E.1.i.(7)): The flyers will be visible to NOVA's public that visits one or more of the campuses within the permit year.

**Necessary documentation for implementation:** (1) Photo of the installed interpretative sign; (2) Photo of an installed storm drain marker and record of how many were installed; and (3) Photo of a flyer installed and record of how many were installed.

**Responsible individual for implementation:** NOVA Manager, Environmental Services

**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:** NOVA shall develop and implement procedures 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 NOVA'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 NOVA's response (Part I.E.2.a.(4)).

### **Procedures for Public Comments or Complaints concerning the MS4 Program Plan**

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

No later than three months (February 1, 2024), NOVA 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 NOVA'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 NOVA'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)); and
- A copy of the most recent VCCS Standards and Specifications (Part I.E.5.d.(2)(a))
- A copy of the most recent VCCS Standards and Specifications approval letter from DEQ (Part I.E.5.d.(2)(b))

**Webpage address:** <https://www.nvcc.edu/about/offices/sustainability/stormwater/index.html>

**Necessary documentation for implementation:** (1) Public input received on the MS4 Program and associated NOVA responses, if applicable; (2) Effective MS4 Permit and coverage letter; (3) Most Recent MS4 Program Plan; (4) All MS4 Annual Reports within permit cycle; (5) Most Recent VCCS Standards and Specifications; and (6) Most recent VCCS Standards and Specifications DEQ approval letter.

**Responsible individual for implementation:** NOVA Manager, Environmental Services

**Implementation schedule:** NOVA 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 NOVA's MS4 Program Plan and other documents that require a public comment period; (6) responding to public input; (7) maintaining public input received and NOVA responses; and (8) Latest VCCS Standards and Specifications.

**BMP 2.2 Public Involvement and Participation (Part I.E.2)**

**Description:** NOVA 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).

- NOVA 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).
- NOVA 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).

<b>Table 4: Public Involvement Opportunities</b>	
<b>Public Involvement Opportunity Categories</b>	<b>Examples</b> (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 NOVA,
- 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.

<b>Table 5: Anticipated Public Involvement Activities for 2024 – 2025 Permit Reporting Year</b>			
<b>Category</b>	<b>Activity Description</b>	<b>Anticipated Time Period for the Activity to Occur</b>	<b>Metric to Determine Benefit to Water Quality</b>
Educational	Booth @ high traffic area/time	Spring 2025	Number of people reached
Educational	Booth @ high traffic area/time	Spring or Summer 2025	Number of people reached
Restoration	Watershed Clean-Up Event	Spring or Summer 2025	Number of people reached
Pollution Prevention	Storm Drain Marking by students	Spring or Summer 2025	Number of storm drains marked

**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:** NOVA Manager, Environmental Services

**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:** NOVA 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 NOVA 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 NOVA's legal responsibility, NOVA 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, NOVA 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 NOVA 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 NOVA (Part I.E.3.a.(1)(e)).
- NOVA 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 NOVA 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 NOVA is assigned a wasteload allocation (Part I.E.3.a.(2)(g)).
- No later than 24 months (November 1, 2025) after permit issuance, NOVA 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, NOVA 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)).
- NOVA 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)).

<b>Table 6: List of Interconnected MS4 Regulated Area(s)</b>	
Fairfax County	City of Alexandria
Loudoun County	Prince William County
Virginia Department of Transportation	

**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:** NOVA Manager, Environmental Services

**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. Prince William County letter by the end of 2023 - 2024 reporting year.

**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:** NOVA 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 NOVA 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).

NOVA prohibits non-stormwater discharges into the storm sewer system through language provided within the Classified Employee Handbook, the Student Code of Conduct and Pollution Prevention Policies 303 and 303P, which provide methods and procedures for reporting and corrective and disciplinary action for NOVA employees, students, visitors, and contractors.

<https://www.nvcc.edu/about/offices/student-rights/student-code.html>

<https://www.nvcc.edu/policies/files/303-Pollution-Prevention.pdf>

<https://www.nvcc.edu/policies/files/303P-Pollution-Prevention.pdf>

**Necessary documentation for implementation:** (1) Standards of Conduct for Employees; (2) Student Handbook (3) Pollution Prevention Policy 303; and (4) Pollution Prevention Policy 303P.

**Responsible individual for implementation:** NOVA Manager, Environmental Services

**Implementation schedule:** Implementation of the Classified Employee Handbook, the Student Code of Conduct and Pollution Prevention Policies 303 and 303P will continue.

**Measurable goal:** Effectiveness will be determined based upon all students, faculty and staff having access to the Classified Employee Handbook, the Student Code of Conduct and Pollution Prevention Policies 303 and 303P.

### **BMP 3.3 Implement Illicit Discharge Detection and Elimination Procedures (Part I.E.3.c)**

**Description:** NOVA 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 NOVA 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 NOVA 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));
  - NOVA 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 NOVA is unable to identify the source of an illicit discharge within six months of beginning the investigation then NOVA shall document that the source remains unidentified. If the observed discharge is intermittent, NOVA 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 NOVA 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));
- 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.

**Necessary documentation for implementation:** (1) Illicit Discharge Detection and Elimination (IDDE) Manual; (2) Outfall information table; (3) MS4 map; (4) Outfall screening field forms; and (5) Findings and Follow Up Form.

**Responsible individual for implementation:** NOVA Manager, Environmental Services

**Implementation schedule:** Annual outfall screening, as described in NOVA'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:** NOVA 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. NOVA shall control construction site stormwater runoff as follows (Part I.E.4.a):

- NOVA is a nontraditional permittee under the purview of the VCCS. The VCCS has developed standards and specifications in accordance with the Virginia Erosion and Sediment Control Law (§ 62.1-44.15:51 et seq. of the Code of Virginia) and Virginia Erosion and Sediment Control Regulations (9VAC25-840), NOVA shall implement the most recent department approved standards and specifications (Part I.E.4.a.(3)).
  - The most recently approved standards and specifications or if incorporated by reference, the location where the standards and specifications can be viewed (Part I.E.4.d.(3)(a)); and
  - A copy of the most recent standards and specifications approval letter from the department (Part I.E.4.d.(3)(b)).

NOVA 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).

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 Sediment Control Law and its attendant regulations (Part I.E.4.c).

Regulated land disturbing activity on the NOVA campuses is managed by the latest edition of the DEQ approved Virginia Community College System's "Standards and Specifications for Erosion and Sediment Control and Stormwater Management."

The VCCS Standards and Specifications provide for the following:

- 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));
- Erosion and Sediment Control (ESC) plan approval by the VCCS through recommendation of a VCCS contracted consultant. An approved plan is required prior to commencement of a regulated land disturbing activity and shall be compliant with the minimum standards listed in 9VAC25-840-40 of the Erosion and Sediment Control Regulations and the approved Standards and Specifications (Part I.E.4.d.(6));
  - Documentation for plan review and inspection procedures, by reference to laws, regulations, and the Virginia Erosion and Sediment Control Handbook (VESCH).
  - A description of circumstances that allow the VCCS Standards and Specifications Project Manager to make changes to an approved plan when found inadequate to address ESC.
- ESC inspection of land disturbing activities for compliance to the ESC Plan during or immediately following initial installation of ESC measures, at least once every two weeks, within 48 hours of a runoff-producing event; and at project completion. Inspections shall be conducted by an individual with a current ESC Inspector's Certification from DEQ (Part I.E.4.d.(6));

- 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 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 and standards and specifications 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 NOVA'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)).

Where applicable, the VCCS Standards and Specifications requires implementation of appropriate controls to prevent non-stormwater discharges to NOVA, such as wastewater, concrete washout, fuels and oils and other illicit discharges identified during land disturbing activity inspections at NOVA (Part I.E.4.b).

A copy of the latest VCCS Standards and Specifications can be found on the NOVA dedicated stormwater website (See BMP 2.1).

**Necessary documentation for implementation:** (1) VCCS S&S for Erosion and Sediment Control; (2) VCCS S&S approval letter in Appendix A; (3) ESC Plan(s) approved by the VCCS; (4) Documentation of ESC Inspector Certification; (5) Completed ESC Inspection Forms for each regulated project; and (6) Notice to Comply and/or Stop Work Orders documentation and documentation of follow-up actions.

**Roles and responsible individual for implementation:** VCCS Program Managers are responsible for the ESC & SWM Program Administration, ESC & SWM signatory authority, and ESC & SWM plan review approval; Assigned VCCS Program Manager and NOVA Project Manager are responsible for ESC plan review and inspection coordination; and the NOVA Manager, Environmental Services is responsible for coordination with the VCCS.

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

**Measurable goals:** Effectiveness will be determined by the implementation of the most current VCCS Standards and Specifications.

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

**Description:** NOVA 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 1.E.5.a):

- NOVA shall implement the most recent department approved standards and specifications and maintain an inspection and maintenance program in accordance with Part 1.E.5.b (Part 1.E.5.a.(4)).

NOVA shall implement an inspection and maintenance program for those stormwater management facilities owned or operated by NOVA as follows (Part 1.E.5.b):

- Within six months (May 1, 2024) of the permit effective date, NOVA shall develop and maintain written inspection and maintenance procedures in order to ensure adequate long-term operation and maintenance of its stormwater management facilities. NOVA 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 1.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 1.E.5.b.(2));
- NOVA shall inspect stormwater management facilities owned or operated by NOVA no less frequently than once per year. NOVA 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 1.E.5.b.(3)); and
- If during the inspection of the stormwater management facility conducted in accordance with Part 1.E.5.b.(2), it is determined that maintenance is required, NOVA shall conduct the maintenance in accordance with the written procedures developed under Part 1.E.5.b.(1) (Part 1.E.5.b.(4)).

NOVA shall include in the MS4 Program Plan the following (Part 1.E.5.d.(2)):

- The most recently approved standards and specifications or if incorporated by reference, the location where the standards and specifications can be viewed (Part 1.E.5.d.(2)(a)); and
- A copy of the most recent standards and specifications approval letter from DEQ (Part 1.E.5.d.(2)(b)).
- A description of the legal authorities utilized to ensure compliance with Part 1.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 1.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 NOVA (Part 1.E.5.d.(4)); and
- The roles and responsibilities of each of NOVA's departments, divisions, or subdivisions in implementing the post-construction stormwater runoff control program (Part 1.E.5.d.(5)).

NOVA will ensure post-construction stormwater management (SWM) for all regulated land disturbing activities through the VCCS plan approval in accordance with the VCCS Standards and Specifications for Erosion and Sediment Control and Stormwater Management (VCCS S&S). Approval from the VCCS will

ensure the SWM plan has been prepared per the VSMP Regulations that, in part, require that stormwater runoff controls:

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

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

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

NOVA will perform long-term operations and maintenance of all stormwater facilities on campus 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, NOVA will utilize BMP-specific inspection and maintenance instruction from the Virginia Stormwater Management Handbook or the NOVA Post-Construction Stormwater Manual. Inspections will be performed either:

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

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

**Necessary documentation for implementation:** (1) Most recent VCCS S&S; (2) VCCS S&S Approval Letter; (3) Post-Construction Stormwater Management Inspection & Maintenance Manual; (4) VCCS approved SWM Plans and Calculations; (5) SWM Facility Inspection and Maintenance Plans; (6) and Inspection Forms.

**Responsible individual for implementation:** VCCS Program Manager or NOVA Project Manager is responsible for the verification of an approved plan prior to approval to start land disturbance. NOVA Manager, Environmental Services is responsible for tracking required information for reporting and obtaining inspection and maintenance plans for stormwater facilities.

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

- Prevent illicit discharges (Part I.E.6.a.(1));
- Ensure NOVA 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)).

NOVA 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, NOVA 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 VSMP construction general permit. NOVA 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 NOVA owned or operated vehicles and equipment (i.e., prevent pollutant discharges from leaking NOVA 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 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) NOVA Good Housekeeping/Pollution Prevention Program Manual; (2) Campus-specific SWPPPs; (3) Training documentation; (4) Completed Comprehensive Campus Evaluation form. All documentation is incorporated into the NOVA Good Housekeeping/Pollution Prevention Program Manual; and (5) Nutrient Management Plans.

**Responsible individual for implementation:** NOVA Manager, Environmental Services

**Implementation schedule:** Training will be provided once every 24 months, and comprehensive campus evaluations will be performed annually. No later than June 30 of each year, NOVA will annually review any high-priority facility owned or operated by NOVA 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, NOVA will develop a SWPPP no later than December 31 of that same year.

**Measurable goals:** Effectiveness will be measured by the implementation of a campus-specific Stormwater Pollution Prevention Plan (SWPPP) as described in BMP 6.5, evaluated with a comprehensive campus 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:** NOVA shall require through the use of contract language, training, written procedures, or other measures within NOVA's legal authority that contractors employed by NOVA 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. A summary of mechanisms NOVA uses to ensure contractors working on behalf of NOVA implements the necessary good housekeeping and pollution prevention procedures, and stormwater pollution plans as appropriate (Part I.E.6.x.(4)):

All contractors performing work on NOVA's properties 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 NOVA's MS4 Program Plan, Good Housekeeping and Pollution Prevention Manual, Nutrient Management Plan, Pollution Prevention Policies 303 and 303P; and the latest approved Virginia Community College System's Standards and Specifications 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 Campus.

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

<https://www.nvcc.edu/about/offices/sustainability/stormwater/index.html>

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) MS4 Program Plan; (2) Good Housekeeping and Pollution Prevention Manual; (3) Nutrient Management Plan; (4) VCCS Standards and Specifications; and (5) Contractor Good Housekeeping and Pollution Prevention Log.

**Responsible individual for implementation:** NOVA Manager, Environmental Services

**Implementation schedule:** NOVA will ensure campus contractors engaging in activities with the potential to discharge pollutants are made aware of and have access to the written procedures that 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, Good Housekeeping and Pollution Prevention Manual, and the Virginia Community College System's Standards and Specifications via NOVA's stormwater webpage.



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

**Description:** Employees and contractors hired by NOVA 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) Campus staff certification.

**Responsible individual for implementation:** NOVA Manager, Environmental Services

**Implementation schedule:** NOVA 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 campus 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 NOVA 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 NOVA 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)).

NOVA shall maintain documentation of each training activity conducted by NOVA 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)).

NOVA 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, NOVA shall remain responsible for ensuring compliance with the training requirements (Part I.E.6.f).

NOVA provides the applicable employees with a Good Housekeeping and Pollution Prevention training video, knowledge check quiz, and a training completion log via SurveyMonkey.

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

- Training to employees in and around recreational facilities (Part I.E.6.d.(3)).
- 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));

**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:** NOVA Manager, Environmental Services

**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 Campus Stormwater Pollution Prevention Plan (Part 1.E.6.g)**

**Description:** Within 12 months (November 1, 2024) NOVA shall identify any new high-priority facilities located in expanded 2020 census urban areas with a population of at least 50,000 (Part I.E.6.g); and within 36 months (November 1, 2026) NOVA shall implement SWPPPs for high-priority facilities meeting the conditions of Part I.E.6.i and which are located in expanded 2020 census urban areas with a population of at least 50,000 (Part I.E.6.h). NOVA 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 I.E.6.i):

- Areas where residuals from using, storing or cleaning machinery or equipment remain and are exposed to stormwater (Part I.E.6.i.(1));
- Materials or residuals on the ground or in stormwater inlets from spills or leaks (Part I.E.6.i.(2));
- Material handling equipment (Part I.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 I.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 I.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 I.E.6.i.(6));
- Waste material except waste in covered, nonleaking containers (e.g., dumpsters) (Part I.E.6.i.(7));
- Application or disposal of process wastewater (unless otherwise permitted) (Part I.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 I.E.6.i.(9)).

Each SWPPP as required in Part I.E.6.g shall include the following (Part I.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 I.E.6.j.(1));
- A description and checklist of the potential pollutants and pollutant sources (Part I.E.6.j.(2));
- A description of all potential non-stormwater discharges (Part I.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 I.E.6.j.(4));
- A maintenance schedule for all stormwater management facilities and other pollutant source controls applicable to SWPPP implementation described in Part I.E.6.h.(4) (Part I.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 I.E.6.a and b (Part I.E.6.j.(6));
- A description of the applicable training as required in Part I.E.6.d.(4) (Part I.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 I.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, NOVA shall annually review any high-priority facility owned or operated by the NOVA 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, NOVA shall develop an SWPPP meeting the requirements of Part I.E.6.h no later than December 31 of that same year. NOVA shall maintain a list of all high-priority facilities owned or operated by NOVA 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).

NOVA 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, NOVA 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, NOVA may remove the facility from the list of high-priority facilities that require SWPPP coverage (Part I.E.6.o).

NOVA 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 ingredients of deicers used on campus will be maintained.

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

NOVA shall provide a list of all high-priority facilities owned or operated by NOVA 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)).

<b>Table 7: List of High Priority Facilities</b>		
<b>High Priority Facility</b>	<b>Address</b>	<b>Location of SWPPP</b>
Alexandria Campus	5000 Dawes Avenue, Alexandria, VA 22311	CW Building (Manager, Environmental Services) and AM Building (Facility Manager)
Annandale Campus	8333 Little River Turnpike, Annandale, VA 22003	CW Building (Manager, Environmental Services) and CBG Building (Facility Manager)
Loudoun Campus	21200 Campus Drive, Sterling, VA 20164	CW Building (Manager, Environmental Services) and LM Buildings (Facility Manager)
Woodbridge Campus	2645 College Drive, Woodbridge, VA 22191	CW Building (Manager, Environmental Services) and WFM Building (Facility Manager)

**Necessary documentation for implementation:** (1) Good Housekeeping & Pollution Prevention Manual; (2) Campus-specific SWPPP; (3) SWPPP inspection forms; and (4) Ingredients of deicers used on campus.

**Responsible individual for implementation:** NOVA Manager, Environmental Services

**Implementation schedule:** By June 30<sup>th</sup> every year NOVA 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. NOVA will also review its properties to determine if the properties no longer meet the criteria of a high priority facility. NOVA will review the campus 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 NOVA'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:** NOVA 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).

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, NOVA shall implement a nutrient management plan no later than six months after the site achieves final stabilization (Part I.E.6.s). NOVA shall implement a Department of Conservation and Recreation (DCR) approved and campus-specific 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 NOVA in accordance with Part I.E.6.n shall be expired due to DCR documented noncompliance with 4VAC50-85-130 provided to NOVA (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).

NOVA 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)).

<b>Table 8: List of Lands where Nutrient Management Plans are Required</b>				
<b>Property Name</b>	<b>Total Area (ac.)</b>	<b>DCR Approval Date</b>	<b>Expiration Date</b>	<b>Location of NMPs</b>
Alexandria Campus	9.27	7/15/2021	7/15/2024	CW Building (Manager, Environmental Services) and AM Building (Facility Manager)
Annandale Campus	13.74	7/15/2021	7/15/2024	CW Building (Manager, Environmental Services) and CBG Building (Facility Manager)
Loudoun Campus	50.81	7/15/2021	7/15/2024	CW Building (Manager, Environmental Services) and LM Building (Facility Manager)
Woodbridge Campus	11.57	7/15/2021	7/15/2024	CW Building (Manager, Environmental Services) and WFM Building (Facility Manager)

Manassas Campus*	16.34	7/15/2021	7/15/2024	CW Building (Manager, Environmental Services) and MM Building (Facility Manager)
Medical Education Center*	1.50	7/15/2021	7/15/2024	CW Building (Manager, Environmental Services) and HE Building (Facility Manager)

\*Not a MS4 property.

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

**Responsible individual for implementation:** NOVA Manager, Environmental Services

**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 60% 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, NOVA 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 9VAC25-870 Part II.C (9VAC25-870-93 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).

NOVA 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, NOVA shall offset the increased loads from projects grandfathered in accordance with 9VAC25-870-48 that begin construction after July 1, 2014, 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.

NOVA 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 NOVA 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).

NOVA 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, NOVA certifies on an MS4 Nutrient Credit Acquisition Form that NOVA 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, NOVA 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 NOVA 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, NOVA'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, NOVA 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, NOVA 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 NOVA's MS4 service area, and designed in accordance with 9VAC25-870 Part II.C (9VAC25-870-93 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).

NOVA 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, NOVA shall update the Phase III Chesapeake Bay TMDL action plan to offset the increased loads from projects grandfathered in accordance with 9VAC25-870-48 that are located in the expanded 2020 census urban areas with a population of at least 50,000, and within NOVA'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).

NOVA 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 NOVA's responses; and (3) Program Plan Updates, as necessary.

**Responsible individual for implementation:** NOVA Manager, Environmental Services

**Implementation schedule:** No later than 12 months (November 1, 2024), NOVA 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) NOVA 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:** NOVA will submit a Chesapeake Bay TMDL implementation annual status report in a method (i.e., how NOVA 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 NOVA 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 NOVA 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 NOVA electronically reported BMPs using the DEQ BMP Warehouse in accordance with Part III.B.3 (Part II.A.14.d.(2)(c)).
- If NOVA 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:** NOVA Manager, Environmental Services

**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:** NOVA shall develop and maintain a local TMDL action plan designed to reduce loadings for pollutants of concern if NOVA 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 NOVA, NOVA 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 NOVA, NOVA 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). NOVA 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).

NOVA 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 NOVA 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 NOVA (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, NOVA 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 Plan (Part II.B.5)**

**Description:** NOVA is a nontraditional permittee; therefore, NOVA shall select at least one strategy listed in Table 10 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).

<b>Table 9: Strategies for Bacteria Reduction Stormwater Control/Management Strategy</b>	
<b>Source</b>	<b>Strategies</b> (provided as an example and not meant to be all inclusive or limiting)
Domestic pets (dogs and cats)	<p>Provide signage to pick up dog waste, providing pet waste bags and disposal containers.</p> <p>Adopt and enforce pet waste ordinances or policies, or leash laws or policies.</p> <p>Place dog parks away from environmentally sensitive areas.</p> <p>Maintain dog parks by removing disposed of pet waste bags and cleaning up other sources of bacteria.</p> <p>Protect riparian buffers and provide unmanicured vegetative buffers along streams to dissuade stream access.</p>
Urban wildlife	<p>Educate the public on how to reduce food sources accessible to urban wildlife (e.g., manage restaurant dumpsters and grease traps, residential garbage, feed pets indoors).</p> <p>Install storm drain inlet or outlet controls.</p> <p>Clean out storm drains to remove waste from wildlife.</p> <p>Implement and enforce urban trash management practices.</p> <p>Implement rooftop disconnection programs or site designs that minimize connections to reduce bacteria from rooftops.</p> <p>Implement a program for removing animal carcasses from roadways and properly disposing of the same (either through proper storage or through transport to a licensed facility).</p>
Illicit connections or illicit discharges to the MS4	<p>Implement an enhanced dry weather screening and illicit discharge, detection, and elimination program beyond the requirements of Part I E 3 to identify and remove illicit connections and identify leaking sanitary sewer lines infiltrating to the MS4 and implement repairs.</p> <p>Implement a program to identify potentially failing septic systems.</p> <p>Educate the public on how to determine whether their septic system is failing.</p> <p>Implement septic tank inspection and maintenance program.</p> <p>Implement an educational program beyond any requirements in Part I.E.1 though Part I.E.6 to explain to citizens why they should not dump materials into the MS4.</p>



<b>Table 10: Strategies for Bacteria Reduction Stormwater Control/Management Strategy Continued</b>	
<b>Source</b>	<b>Strategies</b> (provided as an example and not meant to be all inclusive or limiting)
Dry weather urban flows (irrigations, car washing, powerwashing, etc.)	<p>Implement public education programs to reduce dry weather flows from storm sewers related to lawn and park irrigation practices, car washing, powerwashing and other nonstormwater flows.</p> <p>Provide irrigation controller rebates.</p> <p>Implement and enforce ordinances or policies related to outdoor water waste.</p> <p>Inspect commercial trash areas, grease traps, washdown practices, and enforce corresponding ordinances or policies.</p>
Birds (Canadian geese, gulls, pigeons, etc.)	<p>Identify areas with high bird populations and evaluate deterrents, population controls, habitat modifications and other measures that may reduce bird-associated bacteria loading.</p> <p>Prohibit feeding of birds.</p>
Other sources	<p>Enhance maintenance of stormwater management facilities owned or operated by the permittee.</p> <p>Enhance requirements for third parties to maintain stormwater management facilities.</p> <p>Develop BMPs for locating, transporting, and maintaining portable toilets used on permittee-owned sites. Educate third parties that use portable toilets on BMPs for use.</p> <p>Provide public education on appropriate recreational vehicle dumping practices.</p>

**Necessary documentation for implementation:** Neabsco Creek TMDL Action Plan

**Responsible individual for implementation:** NOVA Manager, Environmental Services

**Implementation schedule:** Update the Neabsco Creek Bacteria 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 and outreach strategies to enhance the public's education.

**BMP SC1.2 Local Bacteria TMDL Action Plan Implementation (Part II.B.5)**

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

**Necessary documentation for implementation:** Neabsco Creek Bacteria TMDL Action Plan

**Responsible individual for implementation:** NOVA Manager, Environmental Services

**Implementation schedule:** The implementation of the Neabsco Creek Bacteria TMDL Action Plan will be according to schedule in Table 11.

<b>Table 10: Neabsco Creek Bacteria TMDL Action Plan Implementation</b>		
<b>Year</b>	<b>Strategies</b>	<b>Method</b>
2023-2028	Identify areas with high bird populations and evaluate deterrents, population controls, habitat modifications and other measures that may reduce bird-associated bacteria loading.	Geese Management via trained dog harassment on campus 2 – 3 times daily, 7 days a week.

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

## **BMP SC2.1 Sediment TMDL Action Plan (Part II.B.6)**

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

- NOVA 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 BMP Clearinghouse listed in 9VAC25-870-65 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)).
- NOVA 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).
- NOVA 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, NOVA 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 NOVA 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).

**Necessary documentation for implementation:** Accotink Creek Sediment TMDL Action Plan

**Responsible individual for implementation:** NOVA Manager, Environmental Services

**Implementation schedule:** Update on the progress of the Accotink Creek Sediment TMDL Action Plan will be submitted no later than 36 months (November 1, 2026) after the effective date of this permit.

**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.

**BMP SC2.2 Sediment TMDL Action Plan Implementation (Part II.B.6)**

**Description:** NOVA will implement a step annually per the schedule in the Accotink Creek Sediment TMDL Action Plan.

**Necessary documentation for implementation:** Accotink Creek Sediment TMDL Action Plan

**Responsible individual for implementation:** NOVA Manager, Environmental Services

**Implementation schedule:** The Accotink Creek Sediment TMDL Action Plan will be implemented according to the schedule in Table 12.

<b>Table 11: Accotink Creek Sediment TMDL Action Plan Implementation</b>			
<b>Step</b>	<b>General Description</b>	<b>Measurable Goal</b>	<b>Completion Date</b>
4	Evaluate the potential for addressing the WLA by modifying the current Street Sweeping Program	<ul style="list-style-type: none"> <li>• If necessary, plan to purchase dedicated sweeper.</li> <li>• If necessary, hire additional staff to adequately address staffing needs to address the WLA.</li> </ul>	June 30, 2024
5	Implement the Street Sweeping Program and evaluate progress in meeting WLA.	<ul style="list-style-type: none"> <li>• Begin staff training &amp; modified street sweeping program.</li> <li>• Explore options for additional BMPs as necessary.</li> </ul>	June 30, 2025
6	Implement the Street Sweeping Program and evaluate progress in meeting WLA.	<ul style="list-style-type: none"> <li>• Continued staff training &amp; modify street sweeping program as necessary.</li> <li>• If required, evaluate options for additional BMPs as necessary.</li> </ul>	June 30, 2026
7	Implement the Street Sweeping Program and evaluate progress in meeting WLA.	<ul style="list-style-type: none"> <li>• Continued staff training &amp; modify street sweeping program as necessary.</li> <li>• If required, implement options for additional BMPs as necessary and feasible.</li> </ul>	June 30, 2027 – June 30, 2037

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

### **BMP SC3.1 Chloride TMDL Action Plan (Part II.B.8)**

**Description:** For local chloride TMDLs (Part II.B.8):

- No later than 36 months (November 1, 2026) after the permit effective date, NOVA shall develop an anti-icing and deicing agent education and outreach strategy that identifies target audiences for increasing awareness of anti-icing and deicing agent application impacts on receiving waters and encourages implementation of enhanced BMPs for application, handling, and storage of anti-icing and de-icing agents used for snow and ice management (Part II.B.8.a).
- Anti-icing and deicing agent education and outreach strategies shall contain a schedule to implement two or more of the strategies listed in Part I.E.1.d Table 1 per year to communicate to target audiences the importance of responsible anti-icing and deicing agent application, transport, and storage (Part II.B.8.b).
- No later than 36 months (November 1, 2026) after permit issuance, NOVA shall review good housekeeping procedures for anti-icing and deicing agent application, handling, storage, and transport activities required under Part I.E.6.b.(1)(a) and identify a minimum of two strategies for implementing enhanced BMPs that promote efficient management and application of anti-icing and deicing agents while maintaining public safety (Part II.B.8.c).

**Necessary documentation for implementation:** Accotink Creek Chloride TMDL Action Plan

**Responsible individual for implementation:** NOVA Manager, Environmental Services

**Implementation schedule:** Update the Accotink Creek Chloride TMDL Action Plan no later than 18 months (May 1, 2025) after the permit effective date and continue implementation of the action plan. No later than 36 months (November 1, 2026) NOVA will develop an anti-icing and deicing agent education and outreach strategy; implement two or more strategies to communicate to target audiences; review the good housekeeping procedures; and identify two strategies for implementing enhanced BMPs.

**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.

**BMP SC3.2 Chloride TMDL Action Plan Implementation (Part II.B.8)**

**Description:** NOVA will implement a step annually per the schedule in the Accotink Creek Chloride TMDL Action Plan.

**Necessary documentation for implementation:** Accotink Creek Chloride TMDL Action Plan

**Responsible individual for implementation:** NOVA Manager, Environmental Services

**Implementation schedule:** The Accotink Creek Chloride TMDL Action Plan will be implemented according to the schedule in Table 13.

<b>Table 12: Accotink Creek Chloride TMDL Action Plan Implementation</b>	
<b>Action Item</b>	<b>Completion Date</b>
<ul style="list-style-type: none"><li>• Salt Management Program Progress provided on the MS4 Annual Report (See 5.1.3)</li><li>• Action Plan Updated as Necessary</li><li>• Snow Operations Staff Training</li></ul>	October 1, 2024
Develop Snow Operations Standard Operating Procedure Manual	June 30, 2025
<ul style="list-style-type: none"><li>• Salt Management Program Progress provided on the MS4 Annual Report (See 5.1.3)</li><li>• Action Plan Updated as Necessary</li><li>• Snow Operations Staff Training</li></ul>	October 1, 2025
Implement SOPs	Winter 2025

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

### 3.3 DEQ BMP Warehouse Reporting

**Description:** No later than October 1 of each year NOVA 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).

NOVA 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).

NOVA 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).

NOVA 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, NOVA 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 NOVA or privately owned (Part III.C.6);
- Whether or not the BMP is part of NOVA'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 NOVA'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, NOVA 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 Tracking Database

**Responsible individual for implementation:** NOVA Manager, Environmental Services

**Implementation schedule:** No later than October 1 of each year, NOVA 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.



**Appendix A: VCCS Standards and Specifications DEQ Approval Letter**



*Commonwealth of Virginia*

***VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY***

1111 E. Main Street, Suite 1400, Richmond, Virginia 23219

P.O. Box 1105, Richmond, Virginia 23218

(800) 592-5482 FAX (804) 698-4178

[www.deq.virginia.gov](http://www.deq.virginia.gov)

Matthew J. Strickler  
Secretary of Natural and Historic Resources

David K. Paylor  
Director  
(804) 698-4000

August 20, 2021

Mr. Robert Jones, RA, CBO, VCCO  
Associate Vice Chancellor for Facilities Management Services  
Arboretum III -300 Arboretum Place, 2<sup>nd</sup> Floor, Suite 200  
Richmond, Virginia 23236

Transmitted electronically: [bjones@vccs.edu](mailto:bjones@vccs.edu)

Subject: Virginia Community College System – Annual Standards and Specifications for Erosion & Sediment Control and Stormwater Management (AS&S for ESC and SWM)

Dear Mr. Jones:

The Virginia Department of Environmental Quality ("DEQ") hereby approves the Annual Standards and Specifications for Erosion & Sediment Control and Stormwater Management for Virginia Community College System (VCCS) dated 3/12/2021. This coverage is effective from August 20, 2021 through August 19, 2022.

To ensure compliance with approved specifications, the Virginia Erosion and Sediment Control Law and the Virginia Stormwater Management Act, DEQ staff will conduct random site inspections, respond to complaints, and provide on-site technical assistance with specific erosion and sediment control and stormwater management measures and plan implementation.

Please note that your approved Annual Standards and Specifications include the following requirements:

1. Variance, exception, and deviation requests must be submitted separately from this Annual Standards and Specifications submission to DEQ. DEQ may require project-specific plans associated with requests to be submitted for review and approval.
2. The following information must be submitted to DEQ for each project at least two weeks in advance of the commencement of regulated land-disturbing activities. Notifications shall be sent by email to: [StandardsandSpecs@deq.virginia.gov](mailto:StandardsandSpecs@deq.virginia.gov)
  - i: Project name or project number;
  - ii: Project location (including nearest intersection, latitude and longitude, access point);
  - iii: On-site project manager name and contact info;

- iv: Responsible Land Disturber (RLD) name and contact info;
  - v: Project description;
  - vi: Acreage of disturbance for project;
  - vii: Project start and finish date; and
  - viii: Any variances/exceptions/waivers associated with this project.
3. Project tracking of all regulated land disturbing activities (LDA) must be submitted to the DEQ on a bi-annual basis. Project tracking records shall contain the same information as required in the two week e-notifications for each regulated LDA.
  4. Erosion & Sediment Control and Stormwater Management plans must be reviewed by DEQ-Certified Plan Reviewers. VCCS as the AS&S holder, retains the authority to approve plans and must do so in writing. Should an AS&S holder contract out to a third party to fulfill the Plan Reviewer certification, this certified Plan Reviewer may recommend approval of the plan but final approval must come from the AS&S holder.

To ensure an efficient information exchange and response to inquiries, the DEQ Central Office is your primary point of contact. Central Office staff will coordinate with our Regional Office staff as appropriate.

Please contact Nathan Crowther at 804-698-4585 or [nathaniel.crowther@deq.virginia.gov](mailto:nathaniel.crowther@deq.virginia.gov) if you have any questions about this letter.

Thank you very much for your submission and continued efforts to conserve and protect Virginia's precious natural resources.

Sincerely,



Erin Ervin Belt, Manager  
Office of Stormwater Management

Case Decision Information:

As provided by Rule 2A:2 of the Supreme Court of Virginia, you have thirty days from the date of service (the date you actually received this decision or the date it was mailed to you, whichever occurred first) within which to appeal this decision by filing a notice of appeal in accordance with the Rules of the Supreme Court of Virginia with the Director, Department of Environmental Quality. In the event that this decision is served on you by mail, three days are added to that period.