Virginia State University

Municipal Separate Storm Sewer System

Program Plan

for the

November 1, 2023 – October 31, 2028 Permit Term

Permit No. VAR040119

Prepared for
Virginia State University
Capital Outlay & Facilities Management
PO Box 9414
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Acronyms and Abbreviations

AE – Architect and Engineer

AS&S – Annual Standards and Specifications for ESC and SWM

BMP – Best Management Practice

ESC – Erosion and Sediment Control

DEQ – Department of Environmental Quality

IDDE – Illicit Discharge Detection and Elimination

P2 – Pollution Prevention

POC – Pollutant of Concern

MCM – Minimum Control Measure

MS4 – Municipal Separate Storm Sewer System

NMP – Nutrient Management Plan

SC – Special Condition

SOP – Standard Operating Procedure

SWM – Stormwater Management

SWPPP – Stormwater Pollution Prevention Plan

TMDL – Total Maximum Daily Load

VPDES – Virginia Pollutant Discharge Elimination System

VSMP – Virginia Stormwater Management Program

WLA – Waste Load Allocation

Introduction

This Municipal Separate Storm Sewer System (MS4) Program Plan (Plan) was developed for Virginia State University's (VSU) main campus in accordance with the *General Permit for Discharges of Stormwater from Small Municipal Separate Storm Sewer Systems* (VAR040119). The effective date of this permit coverage is November 1, 2023 through October 31, 2028. VSU's Department of Capital Outlay and Facilities is responsible for administering the overall MS4 Program, however specific roles and responsibilities in the implementation of permit requirements have been identified in **Appendix A**.

VSU's regulated area includes roads, parking lots, dormitories, academic buildings, building and facilities maintenance, landscaping, libraries, cafeterias, stores, athletic fields, and other areas common to Universities. The regulated area does not include VSU's Randolph Farm, which is located approximately one mile to the east. For the purposes of this plan, the public is considered students, faculty, staff, contractors, and consultants who are typically within the regulated area for some period of time.

This Program Plan is a management tool for VSU to comply with the six Minimum Control Measures (MCM) and Special Conditions (SC) of the general permit. **Section MCM 1** through **Section MCM 6** of this Plan describe VSU's plan to comply with the corresponding MCMs as listed below:

MCM 1 - Public Education and Outreach

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 for New or Redevelopment

MCM 6 - Pollution Prevention and Good Housekeeping

A description of the roles and responsibilities, policies and procedures, measurable goals, and implementation schedules are provided for each MCM in the corresponding section. Section SC describes VSU's plan to comply with Chesapeake Bay Total Maximum Daily Limit (TMDL) Special Conditions.

This Plan will be evaluated for appropriateness and updated annually as necessary. The objective of this Plan is to provide the framework for VSU to continually evaluate and improve its stormwater management program with the goal of reducing pollution from MS4 regulated areas during the permit term.

Annual reports summarizing the collective efforts and program changes from the previous reporting year will be submitted to the Department of Environmental Quality (DEQ) by October 1st of each year.

Documents incorporated by reference as part of this Plan are presented in **Table 1**, below:

Table 1 - Referenced Documents

Document Title	Version	Date	Available Location
Annual Standards and Specifications for Erosion and Sediment Control and Stormwater Management	Final Approved	May 2, 2019	https://www.vsu.edu/capital-outlay/programs-resources-procedures.php
Illicit Discharge Ordinance for Chesterfield County	Current	Current	https://www.chesterfield.gov/317/Illicit-Discharge-to-County-Waters
City of Colonial Heights Stormwater Management Ordinance	Current	Current	https://ecode360.com/13530317
VSU Nutrient Management Plan	Final Pending Approval	April 18, 2025– April 18, 2028	https://www.vsu.edu/capital-outlay/programs-resources-procedures.php
Chesapeake Bay TMDL Action Plan	Final	April 2025	https://www.vsu.edu/capital-outlay/programs-resources-procedures.php
Pollution Prevention/Good Housekeeping Standard Operating Procedures	Final	April 2025	https://www.vsu.edu/capital-outlay/programs-resources-procedures.php

Unless otherwise noted, the majority of the above documents can be viewed at VSU's MS4 webpage: https://www.vsu.edu/capital-outlay/programs-resources-procedures.php. These documents are updated on an on-going basis and the most recent version should always be referenced.

VSU's MS4 webpage also provides a contact where the public can;

1) Find out more information regarding VSU's MS4 program,
2) Report potential illicit discharges,
3) Report improper disposal,
4) Report spills,
5) Report complaints regarding land disturbing activities,
6) Report other potential stormwater pollution concerns,
7) Provide input on VSU's MS4 Program Plan, or
8) Report other related concerns.

MCM 1 - Public Education and Outreach

Permit Requirements (Part I.E.1.f)

The Public Education and Outreach Plan shall include:

1. A list of the high-priority stormwater issues the permittee will communicate to the public as part of the public education and outreach program;
2. The rationale for selection of each high-priority stormwater issue and an explanation of how each education or outreach strategy is intended to have a positive impact on stormwater discharges;
3. Identification of the target audience to receive each high-priority stormwater message;
4. Nontraditional permittees may identify staff, students, members of the general public, and other users of facilities operated by the permittee as the target audience for education and outreach strategies;
5. Traditional permittees may identify staff and students as part of the target audience for education and outreach strategies; however, staff shall not be the majority of the target audience;
6. Staff training required in accordance with Part I.E.6.d does not qualify as a strategy for public education and outreach;
7. The strategies from Table 1 of Part I.E.1.d to be used to communicate each high-priority stormwater message; and
8. The anticipated time periods the messages will be communicated or made available to the public.

Responsible Parties (Refer to Appendix A)

- Assistant Vice President for Capital Outlay and Facilities
- Director of Capital Outlay
- Director of Facilities Management

Program Description

VSU has developed a public education and outreach program designed to increase the public's knowledge of how to reduce stormwater pollution. This program places priority on reducing impacts to impaired waters since the entirety of VSU's MS4 service area ultimately discharges to the Appomattox River, which

is listed as impaired. VSU's program also addresses other local water pollution concerns such as reducing litter that reaches waterways. The program also increases the public's knowledge of hazards associated with illegal discharges and improper disposal of waste, including pertinent legal implications addressed in MCM 3. VSU has implemented a diverse program with strategies that are targeted toward individuals or groups most likely to have significant stormwater impacts. VSU has chosen three high-priority stormwater issues to education the public on the above goals, as presented in **Table 2**. Measurable goals by which these strategies will be evaluated are identified in **Table 2**. Additional information can be found on the University's Capital Outlay "Programs, Resource and Procedures" website.

Table 2 - Public Education and Outreach Table

High Priority Issues	Land and Vegetation Management	General Stormwater Awareness	Dumpster and Litter Management on Campus
Rationale for Selection	Minimize the impact of development in an effort to improve downstream water quality	Communicate with individuals who may not regularly seek out environmental information	Minimize the impact of trash on downstream waters.
Identification of Public Audience	Architectural and Engineering (AE) firms preparing plans and designs on campus, students, staff, and faculty	Students, staff, and faculty	Students, staff, and faculty
Applicable Strategies	Media Materials (electronic media) and/or Traditional Written Materials	Traditional Written Materials, Media Materials (electronic media), Signage and/or Speaking Engagements	Media Materials (electronic media)
Anticipated Time Period Message will be Communicated	Fall & Spring Semesters	Spring Semester	Spring Semester
Relevant Message	The University is dedicated to minimizing the impact of its building development program on the environment. While there are many initiatives in place to achieve these goals, the catalyst to improving the quality of stormwater runoff from the campus is to provide stormwater management on a campus-wide basis to the greatest extent possible. The University has developed design standards and guidelines to facilitate this goal.	Clean water is everyone's business! There are simple things that everyone can do to prevent stormwater runoff pollution.	Trash and litter have a significant impact on receiving waters downstream of campus. Ensuring that dumpsters are strategically located, that dumpster lids stay closed, and that trash makes it into dumpsters is the first line of defense in preventing campus trash and litter from reaching receiving waters.

High Priority Issues	Land and Vegetation Management	General Stormwater Awareness	Dumpster and Litter Management on Campus
Materials Used	Annual Standards and Specifications for Erosion and Sediment Control and Stormwater Management, Campus Design Guidelines, and/or 9 Ways Trees Benefit Us All Through Ecological Services factsheet	Temporary Tree Campus signage, service event summaries, stormwater fact sheets, and/or speaking presentations	Dumpster best practices fact sheet and/or general litter management educational material
Distribution Methods	Availability on website, email distribution to all AE firms performing planning and designs on campus, and/or, distribute fact sheets via email, social media and/or at related campus events	Install temporary Tree Campus sign on campus during event, distribute hardcopy fact sheets, and service event summaries via email and/or social media to all students, staff, or faculty, invite professionals to present at classrooms	Distribute fact sheets via email and/or social media posts to all students, staff, and faculty.

Measurable Goals

Throughout implementation of the Public Outreach and Education program with a focus on land and vegetation management, general stormwater awareness, and dumpster/litter maintenance, VSU will annually evaluate the effectiveness of the University's efforts. Progress or changes to these efforts will be noted in the Annual report, along with documentation of:

- Number of electronic media posts;
- Number of times the temporary signage is posted (i.e. Tree Campus);
- Number of university sponsored events at which hardcopy flyers are distributed; and
- Number of classroom presentations and number of students reached.

Annual Reporting Requirements

1. A list of the high-priority stormwater issues the permittee addressed in the public education and outreach program;
2. A summary of the public education and outreach activities conducted for the report year, including the strategies used to communicate the identified high-priority issues;
3. A description of any changes in high-priority stormwater issues, including, strategies used to communicate high-priority stormwater issues or target audiences for the public education and outreach plan. The permittee shall provide a rationale for any of these changes; and

4. A description of public education and outreach activities conducted that included education regarding climate change.

MCM 2 - Public Involvement and Participation

Permit Requirements (Part I.E.2.e)

The Program Plan shall include:

1. The webpage address with mechanisms for the public to report (i) potential illicit discharges, improper disposal, or spills to the MS4, (ii) complaints regarding land disturbing activities, or (iii) other potential stormwater pollution concerns;
2. The webpage address that contains the methods for how the public can provide input on the permittee's MS4 program; and
3. A description of the public involvement activities to be implemented by the permittee, 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 or the number of participants in a hazardous waste collection event.

Responsible Parties (Refer to Appendix A)

- Assistant Vice President of Capital Outlay and Facilities
- Director of Capital Outlay
- Director of Facilities Management
- Technology Services

Program Description

VSU maintains an MS4 webpage at the following link: https://www.vsu.edu/capital-outlay/programs-resources-procedures.php. The webpage hosts VSU's effective MS4 permit and coverage letter, the most current MS4 Program Plan and the Annual Report for each year covered by the current permit. The webpage also lists a contact with whom the public can report potential illicit discharges, improper disposal, spills to the MS4, complaints regarding land disturbing activities or other potential stormwater pollution concerns, input on VSU's MS4 program, or input on VSU's Chesapeake Bay TMDL Action plan. If comments are received on VSU's MS4 program or Chesapeake Bay TMDL Action Plan, the appropriate responsible parties will review the comments, decide on the implementation of the comments and document the decision. VSU will maintain electronic records of all input or complaints received on the MS4 Program and Chesapeake Bay TMDL Action Plan and will also maintain electronic records of all responses.

VSU will participate in the following activities, as presented in **Table 3**, to encourage public involvement with stormwater and environmental activities. Measurable goals by which these strategies will be evaluated are identified by each metric in **Table 3**.

Table 3 - Public Involvement and Participation Matrix

Public Involvement Activities	Description	Anticipated Time Periods	Metrics
Fall Service Day Event (Restoration and Public Education Activity)	This volunteer trash clean-up event is hosted by the Capital Outlay and Facilities Department to educate participants about stormwater issues associated with trash as they visit stormwater facilities on campus.	Fall Semester	Number of participants and/or number of trash bags collected
Spring Service Day (Restoration and Public Education Activity)	This volunteer trash clean-up event is hosted by the Capital Outlay and Facilities Department to educate participants about stormwater issues associated with trash as they visit stormwater facilities on campus.	Spring Semester	Number of participants and/or number of trash bags collected
Tree Campus USA Advisory Committee (Public Meetings)	These meetings allow for representation of students, faculty, facilities management and the community with respect to the trees on campus and future plans involving them, as well as educational presentation as to why they are important to campus and the effects of adding more trees.	Throughout Year	Number of meetings held
Pollution Prevention	VSU has implemented an eco-friendly waste disposal practice with the installation of solar-powered trash compactors on campus. Each unit can compact up to 150 gallons of trash, five times the capacity of current waste receptacles. A wireless monitoring system notifies facilities staff when a compacter requires maintenance or needs to be emptied. Installation of these devices directly support the high	Throughout Year	Number of units maintained annually and/or volume of trash collected

	priority issue of Dumpster and Litter Management on Campus.		

VSU has developed procedures for the public to report potential stormwater pollution concerns as addressed in **Section MCM 3**. Should VSU be unable to execute one of the programs specified above, an appropriate substitute program will be identified and completed as an alternative. Alternatives in the past have included an Arbor Day Celebration, Stormwater BMP Tour, Classroom Guest Presentation, and others.

Measurable Goals

The University's goal is to implement an effective Public Involvement and Participation program, therefore VSU will evaluate the effectiveness of the program annually. Progress, or success, of the program will be measured by the metrics listed in **Table 3**.

Annual Reporting Requirements

1. A summary of any public comments on the MS4 program received and how the permittee responded;
2. A summary of stormwater pollution complaints received under the procedures established in Part I.E.2.a (1), excluding natural flooding complaints, and how the permittee responds;
3. A webpage address to the permittee's MS4 program and stormwater website;
4. Federal and state nontraditional permittees with security policies preventing the MS4 program and stormwater pollution prevention webpage from being publicly accessible utilizing an internal staff accessible website, such as intranet, shall provide evidence of the current internal MS4 program and stormwater pollution prevention webpage;
5. A description of the public involvement activities implemented by the permittee, including any efforts to reach out and engage all economic and ethnic groups;
6. A description of public education and outreach activities conducted that also included education regarding climate change;
7. A report of the metric as defined for each activity and an evaluation as to whether the activity is beneficial to improving water quality; and
8. The name of other MS4 permittees with whom the permittee collaborated in the public involvement opportunities.

MCM 3 - Illicit Discharge Detection and Elimination

Permit Requirements (Part I.E.3.d)

The Program Plan shall include:

1. The MS4 map and outfall information table required by Part I.E.3.a. The map and outfall information table may be incorporated into the MS4 program plan by reference. The map shall be made available to the department within 14 days upon request;
2. Copies of written notifications of physical interconnections given by the permittee to other MS4s; and
3. The IDDE procedures described in Part I.E.3.c.

Responsible Parties (Refer to Appendix A)

- Director of Capital Outlay
- Director of Facilities Management
- Environmental Compliance Officer

Program Description

VSU maintains an accurate MS4 Map that includes, at a minimum, the requirements listed in **Part I E.3.a.1** of the permit. VSU also maintains an information table for each outfall or point of discharge that includes the requirements listed in **Part I E.3.a.2**. VSU's outfall map and outfall information table are included in **Appendix D**. VSU submitted to DEQ a GIS-compatible shapefile of the MS4 map by July 1, 2019, and an updated file will be submitted to DEQ as changes occur. Should any changes to the storm sewer system occur or be realized, VSU will update the storm sewer system map and MS4 shapefile by October 1 of each year.

Copies of written notifications of new or discovered physical interconnections given to other MS4s are included in **Appendix D**. Currently there is only one interconnection with the Virginia Department of Transpiration storm sewer system, established in 2014.

VSU prohibits any unauthorized non-stormwater discharges into the storm sewer system through the *Prohibition of Illegal Discharges Policy,* below. VSU has also developed *Illicit Discharge Detection and Elimination Procedures* (IDDE) are described below.

Prohibition of Illegal Discharges Policy

No person shall discharge or cause a discharge of materials containing contaminates into any VSU storm drain system or surface water. Contaminates include but are not limited to the following: Trash or debris; Construction materials; Petroleum products (oil, gasoline, grease, fuel oil, heating oil, etc.); Antifreeze or other vehicle products; De-icing products; Metals (particulate or dissolved); Flammable or explosive materials; Radioactive material; Batteries; Acids, alkalis, or bases; Paints, stains, resins, lacquers, or varnishes; Degreasers and/or solvents; Drain cleaners; Pesticides, herbicides, or fertilizers; Steam cleaning wastes; Soaps, detergents, or ammonia; Swimming pool filter backwash; Chlorine, bromine, or other disinfectants; Heated water; Domestic animal waste; Sewage; Recreational vehicle waste; Animal carcasses; Food wastes; Bark or other fibrous materials; Lawn clippings, leaves, or branches; Silt, sediment, concrete, cement, or gravel; Dyes; Chemicals, including suspected metals, not normally found in uncontaminated water; Any other process-associated discharge; Any hazardous material or waste not listed above.

IDDE Procedures

Public Reporting of Illicit Discharges

VSU has established an Emergency Service Request hotline (**804-524-5451)** where illicit discharges (illegal dumping) can be reported to VSU Facilities. This information is available on the VSU Facilities webpage (https://www.vsu.edu/capital-outlay/programs-resources-procedures.php.) and is included on all stormwater fact sheets.

Dry Weather Screening

Dry weather shall be considered present after 2 days with less than 0.2 inches of rain.

1. All stormwater outfalls will be screened on an annual basis (provided the number of outfalls remains below 50).
2. Screenings will be conducted during daylight hours, in dry weather conditions, and with the *Stormwater Outfall Inspection Form* (**Appendix D)**.
3. Upon facility staff detection or public reporting of a suspected illicit discharge, the information on the *Illicit Discharge Investigation Form* (**Appendix D)** shall be documented and the **Investigation and Elimination Procedures**, below, will be initiated.

Investigation & Elimination Procedures

1. Preventative measures shall be immediately set in place to ensure that any remaining potential contaminant is contained and prevented from entering or leaving the storm sewer system as practical.
2. Facilities Management staff shall investigate the source, quantity, and cause of any suspected illicit discharge within 30 days of its discovery or public report.
3. Suspected illicit discharge investigations shall be prioritized in the following order:
    a. Discharges suspected of being sanitary sewerage or of significantly contaminated material
    b. Discharges suspected of being less hazardous to human health
4. If a suspected illicit discharge is intermittent and the source(s) cannot be identified, VSU must document each investigation in accordance with the procedures below for a minimum of three investigations.
5. Should VSU not be able to eliminate the discharge in a cooperative manner through verbal and/or written notice, the incident shall escalate to the appropriate jurisdiction for court proceedings, in accordance with the **Civil and Criminal Penalties,** below.
6. Upon elimination of the discharge, any remaining contaminant shall be cleaned up or removed and disposed of properly.
7. Follow up screening activities shall be performed periodically until it can be confirmed that the illicit discharge was eliminated.
8. Upon confirmed elimination of the illicit discharge, normal **Dry Weather Screening** activities shall be resumed.

Documentation Procedure

1. Scan all *Stormwater Outfall Inspection f*orms and all *Illicit Discharge Investigation* forms to maintain electronic records.
2. Maintain digital copies of all *Stormwater Outfall Investigation* forms, *Illicit Discharge Investigation* forms, and police reports within the corresponding MS4 Annual Report binder for audit purposes.

Civil and Criminal Penalties

Should VSU be unable to seek compliance in a suspected illicit discharge incident in a cooperative manner, it shall be subject to investigation by the VSU Department of Police & Public Safety. Upon detection of illegal discharge(s) on VSU property that cannot be resolved otherwise, VSU Department of Police & Public Safety will be contacted to conduct an investigation and complete a written report. Individuals for whom it has been determined that a violation of either the Chesterfield County Chapter 8, Article III or City of Colonial Heights

Stormwater Ordinance Sections 245 has occurred shall be subject to the penalties outlined in those sections as appropriate. These ordinances are available as noted in **Table 1**.

Measurable Goals

VSU's goal is to maintain Permit compliance by reducing or eliminating non-stormwater discharges through the implementation of this program. The number of outfalls screened and reports and responses recorded each year will be the measurable goal by which these strategies will be evaluated.

Annual Reporting Requirements

1. A confirmation statement that the MS4 map and outfall information table have been updated to reflect any changes to the MS4 occurring on or before June 30 of the reporting year;
2. The total number of outfalls and observation points screened during the reporting period as part of the dry weather screening program; and
3. A list of illicit discharges to the MS4, including spills reaching the MS4 with information as follows:
    a. The location and source of illicit discharge;
    b. The dates that the discharge was observed, reported, or both;
    c. Whether the discharge was discovered by the permittee during dry weather screening, reported by the public, or other method (describe);
    d. How the investigation was resolved;
    e. A description of any follow-up activities; and
    f. The date the investigation was closed.

MCM 4 - Construction Site Stormwater Runoff Control

Permit Requirements (Part I.E.4.d)

The Program Plan shall include:

1. If the permittee implements an erosion and sediment control program for construction site stormwater runoff in accordance with **Part I.E.4.a.1**, the local ordinance citations for the VESCP program;
2. If the permittee is a town that does not implement an erosion and sediment control program for construction site stormwater runoff in accordance with **Part I.E.4.a.2**, the county ordinance citations for the VESCP program the town is subject to;
3. If the permittee implements annual standards and specifications for erosion and sediment control and construction site stormwater runoff in accordance with **Part I.E.4.a.3**:
    a. The most recently approved standards and specifications or if incorporated by reference, the location where the standards and specifications can be viewed; and
    b. A copy of the most recent standards and specifications approval letter from the department;
4. A description of the legal authorities utilized to ensure compliance with **Part I.E.4.a.** for erosion and sediment control and construction site stormwater runoff control, such as ordinances, permits, orders, specific contract language, policies, and interjurisdictional agreements;
5. For traditional permittees, written inspection procedures to ensure VESCP requirements are maintained in accordance with **9VAC25-840-90 A** and onsite erosion and sediment controls are properly implemented in accordance with **9VAC25-840-60 B**;
6. For nontraditional permittees, erosion and sediment control plans or annual standards and specifications shall be approved by the department in accordance with **§ 62.1-44.15:55** of the Code of Virginia. Compliance with approved erosion and sediment control plans or annual standards and specifications shall be ensured by the permittee with written inspection procedures that at minimum include the following:
    a. 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; and
    b. A list of all associated documents utilized for inspections, including checklists, department approved erosion and sediment control plans, or the most recently

approved department annual standards and specifications, and any other documents utilized;

7. Traditional permittees shall maintain written procedures for requiring VESCP compliance through corrective action or enforcement action in accordance with **§ 62.1-44.15:58** of the Code of Virginia;
8. Nontraditional permittees shall maintain written procedures for requiring compliance with department approved erosion and sediment control plans and annual 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; and
9. The roles and responsibilities of each of the permittee's departments, divisions, or subdivisions in implementing erosion and sediment control and construction site stormwater runoff control requirements in **Part I.E.4**.

Responsible Parties (Refer to Appendix A)

- Director of Capital Outlay
- Director of Facilities Management

Program Description

VSU provides oversight of land disturbing activities, ESC plan review and approval, compliance and enforcement, and regulatory coordination through implementing the most recent DEQ approved *Annual Standards and Specifications for Erosion and Sediment Control and Stormwater Management* (AS&S) which can be viewed as indicated in **Table 1**. Inspection procedures, enforcement actions, and legal authorities are laid out in Section 5 of the Annual Standards and Specifications. The most recent approval letter is included in **Appendix E**.

Measurable Goals

The University's goal is to operate a compliant Erosion and Sediment Control Program. The number of AE firms receiving the AS&S each year, as well as the number of ESC inspections conducted will be the measurable goals by which these strategies are evaluated.

Annual Reporting Requirements

1. Total number of erosion and sediment control inspections conducted;
2. Total number of each type of compliance action and enforcement action implemented; and

3. For nontraditional permittees:
4. A confirmation statement that land disturbing projects that occurred during the reporting period have been conducted in accordance with the current department approved annual standards and specifications for erosion and sediment control; and
5. If any land disturbing projects were conducted without department approved annual standards and specifications, a list of all land disturbing projects that occurred during the reporting period with erosion and sediment control plan approval dates for each project.

MCM 5 - Post-Construction Stormwater Management

Permit Requirements (Part I.E.5.d)

The Program Plan shall include:

1. If the permittee implements a VSMP in accordance with **Part I.E.5.a.1, 2, or 3**:
    a. A copy of the VSMP approval letter issued by the department;
    b. Written inspection procedures and all associated documents utilized in the inspection of privately owned stormwater management facilities; and
    c. Written procedures and compliance and enforcement of inspection and maintenance requirements for privately owned stormwater management facilities;
2. If the permittee implements a post-development stormwater runoff control program in accordance with **Part I.E.5.a.4**:
    a. The most recently approved standards and specifications or if incorporated by reference, the location where the standards and specifications can be viewed; and
    b. A copy of the most recent standards and specifications approval letter from the department;
3. A description of the legal authorities utilized to ensure compliance with **Part I.E.5.a** for post-construction stormwater runoff control such as ordinances (provide citation as appropriate), permits, orders, specific contract language, and interjurisdictional agreements.
4. Written inspection and maintenance procedures and other associated template documents utilized during inspection and maintenance of stormwater management facilities owned or operated by the permittee; and
5. The roles and responsibilities of each of the permittee's departments, divisions, or subdivisions in implementing the post-construction stormwater runoff control program.

Responsible Parties (Refer to Appendix A)

- Director of Capital Outlay and Maintenance Reserve
- Director of Facilities Management

Program Description

VSU will continue to implement the most recent DEQ approved *Annual Standards and Specifications for Erosion and Sediment Control and Stormwater Management* (AS&S) which can be viewed as indicated in **Table 1**. The most recent Annual Standards and Specifications and approval letter (**Appendix E**) can also be found on the VSU webpage: https://www.vsu.edu/capital-outlay/programs-resources-procedures.php.

VSU maintains an electronic database of Stormwater Management (SWM) Facilities per the requirements in **Part I E.5.d**. This database is presented in **Appendix F** and is updated no later than 30 days after a new SWM Facility or BMP is brought online.

VSU will use the *DEQ Construction Stormwater Database* (https://apps.deq.virginia.gov/swcgp) to report each stormwater management facility installed after July 1, 2014 to address the control of post-construction runoff from land disturbing activities for which a *General VPDES Permit for Discharges of Stormwater for Construction Activities* was required.

VSU will use the *DEQ BMP Warehouse* (https://apps.deq.virginia.gov/BMP) to report the stormwater management facilities implemented during each reporting year for which a *General VPDES Permit for Discharges of Stormwater from Construction Activities* was not required.

SWM Facility Inspection and Maintenance Procedures

VSU provides inspections and maintenance of operator-maintained SWM facilities in accordance with the procedures provided below. For SWM facilities that are owned by VSU but operated and maintained by another entity, VSU requires that entity to follow equivalent or similar procedures and will request summaries or copies of that entity's efforts.

Inspection Procedures

1. Inspections will be conducted by the Capital Outlay Department or their designee.
2. Inspections shall be performed by Professional Engineers or otherwise qualified personnel.
3. Inspections shall be performed for each SWM facility at the frequency indicated in

4. **Table** 4, below.

Table 4 - SWM Facility Inspection Frequency

Facility Type	Minimum Inspection Frequency
Filterra (curb)	Annually
Filterra (roof)	Annually
Stormfilter	Annually
Sorbitive Filter	Annually
Sand Filter	Annually
Above Ground Basin	Annually
Below Ground Basin	Annually

5. Inspections may occur more often than the minimum frequency if deemed necessary.
6. All SWM Facilities shall be visually inspected after severe storm events.
7. Inspections shall be conducted in accordance with the example inspection forms in **Appendix F**.
8. All SWM Facility inspection reports will be electronically recorded by the Capital Outlay Department.
9. Hard copies of inspection reports will be maintained in the corresponding Annual Report.
10. Inspection records shall be kept on file until the SWM Facility is no longer in use.

Maintenance Procedures

1. The Capital Outlay and Facilities Management Departments will be responsible for maintaining operator-maintained SWM facilities.
2. Minor maintenance will be performed by the Facilities Management Department.
3. Major maintenance or major repairs will be performed by a certified contractor under the direction of the Capital Outlay Department. The Capital Outlay Department will be responsible for coordinating all necessary construction permits related to maintenance or repair of operator-owned stormwater facilities.
4. Non-proprietary maintenance shall follow industry standards to return the SWM facility to its intended function based upon the original approved design intent or other appropriate standard as applicable.
5. Proprietary maintenance activities shall be performed in accordance with the manufacturer's recommendations by a certified maintenance provider or qualified personnel.
6. After maintenance activities are complete, the facility shall be re-inspected using the appropriate checklist.
7. All major maintenance or repair activities will be electronically recorded by the Capital Outlay Department.

8. Hard copies of major maintenance or repair activities will be maintained in the corresponding Annual Report.
9. Maintenance records shall be kept on file until the SWM Facility is no longer in use.

Measurable Goals

VSU's goals are to install required (per VSMP regulations) post construction stormwater management facilities and properly maintain them. The number of SWM Facilities inspected each year will be the measurable goal by which these strategies are evaluated.

Annual Reporting Requirements

1. If the traditional permittee implements a VSMP in accordance with **Part I.E.5.a.1, 2, or 3**:
    a. The number of privately-owned stormwater management facility inspections conducted; and
    b. The number of enforcement actions initiated by the permittee to ensure long-term maintenance of privately-owned stormwater management facilities including the type of enforcement action;
2. Total number of inspections conducted on stormwater management facilities owned or operated by the permittee;
3. A description of the significant maintenance, repair, or retrofit activities performed on the stormwater management facilities owned or operated by the permittee to ensure it continues to perform as designed. This does not include routine activities such as grass mowing or trash collection;
4. For traditional permittees as specified in **Part I.E.5.a.1**, a confirmation statement that the permittee submitted stormwater management facility information through the Virginia Construction Stormwater General Permit database for those land disturbing activities for which the permittee was required to obtain coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities in accordance with **Part III.B.1** or a statement that the permittee did not complete any projects requiring coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities (9VAC25-880);
5. A confirmation statement that the permittee electronically reported stormwater management facilities using the DEQ BMP Warehouse in accordance with **Part III.B.1 and 2**; and
6. A confirmation statement that the permittee electronically reported stormwater management facilities inspected using the DEQ BMP Warehouse in accordance with **Part III.B.5**.

MCM 6 - Pollution Prevention and Good Housekeeping

Permit Requirements (Part I.E.6.x)

The Program Plan shall include:

1. A list of written good housekeeping procedures for the operations and maintenance activities as required by **Part I.E.6.a and b**;
2. A list of all high-priority facilities owned or operated by the permittee 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;
3. A list of locations for which turf and landscape nutrient management plans are required in accordance with **Part I.E.6.n and s**, including the following information:
    a. The total acreage covered by each nutrient management plan;
    b. The DCR approval date and expiration date for each nutrient management plan; and
    c. The location of the nutrient management plan hardcopy or electronic document being maintained;
4. A summary of mechanisms the permittee uses to ensure contractors working on behalf of the permittees implement the necessary good housekeeping and pollution prevention procedures, and stormwater pollution plans as appropriate; and
5. The written training plan as required in **Part I.E.6.d**.

Responsible Parties (Refer to Appendix A)

- Environmental Compliance Officer
- Director of Facilities Management

Program Description

Pollution Prevention and Good Housekeeping Standard Operating Procedures

VSU has developed and implemented *Pollution Prevention and Good Housekeeping Standard Operating Procedures* (SOPs) designed to minimize or prevent pollutant discharge from daily operations and maintenance activities such as: equipment maintenance, and the application, storage, transport, and

disposal of pesticides, herbicides, and fertilizers. The SOPs are available in **Table 1** and in **Appendix G**. These SOPs will be made available to all contractors working on campus and must be adhered to.

High Priority Facilities

Table 5, below, lists high-priority facilities within VSU's regulated MS4 boundary and identifies which of those facilities may require Stormwater Pollution Prevention Plans (SWPPPs).

Table 5 - High Priority Facilities

Location	Address	Description	High Potential to Discharge?
Physical Plant	2916 Myster Macklin St, Petersburg, VA 23806	This building is identified by its green roof painting and proximity to the agriculture engineering shop and Fauntleroy Hall.	Yes
Heating Plant	College Ave, Petersburg, VA 23806	This building is accessed via the parking lot adjacent to Lockett Hall and can be identified by its green roof and large chimney.	Yes
Academic Success Center (Hazardous Waste Storage)	21012 Service Rd, Virginia State University, VA 23806	This building is immediately adjacent to the Academic Success Center and Parking Lot #13. It is a brick building with two white doors.	Yes
MT Carter Building (Hazardous Waste Storage)	Carter G Woodson Ave, Petersburg, VA 23803	This building is immediately behind the MT Carter Building. It has five metal doors and is built of brick.	Yes
Jones Dining Hall Grease Trap	3206 Hayden St, Petersburg, VA 23806	The grease trap is located along Barnes Street. This building is made of brick and has white windows with rounded tops.	Yes

Foster Hall Grease Trap	3114 Lee St, Petersburg, VA 23806	This grease trap is identified by its location in Parking Lot 23, directly adjacent to Johnston Memorial Library. It is between two trees and on the edge of a field for student activities.	Yes
Gateway Dining Grease Trap	2804 Martin Luther King Dr, Ettrick, VA 23806	This grease trap is located next to the dumpster area designated with brick fencing and is between Gateway Hall and Gateway Dining.	Yes

VSU has developed and implemented one University-wide SWPPP for the facilities identified in **Table 5** that have a high potential to discharge pollutants in stormwater. VSU will assess its MS4 service area as part of the annual SWPPP inspection in order to determine if a facility needs to be added or delisted. The SWPPP will be updated should any facility be added or delisted. VSU will review the SWPPP no later than 30 days after any unauthorized discharge and update the SWPPP within 90 days. The SWPPP is presented in **Appendix G** and maintained as a digital copy at the Capital Outlay and Facilities Building.

Nutrient Management Plans

The campus includes approximately seven areas where nutrients may be applied to a continuous area greater than one acre. VSU has prepared one overall NMP for all turf grounds and athletic fields that receive fertilizer on the main campus, as required by **§10.1-104.4** of the Code of Virginia. The most recent NMP approval letter can be found in **Appendix G**.

Table 6, below, lists lands for which turf and landscape management plans have been implemented. The Nutrient Management Plan is maintained digitally and can be accessed by contacting the Director of Capital Outlay.

Table 6 - Nutrient Management Areas

Area	Total Acreage	Date of Most Recently Approved Plan	Expiration Date of Most Recently Approved Plan	Location in Which the Plan is Located
Athletic Fields	6.24	April 18, 2025	April 18, 2028	Office of Capital Outlay Director
Campus Grounds	87.6			

Training Schedule

VSU has established the following training schedule and program for appropriate employees:

1. Facilities Management staff will be trained in accordance with the following schedule and training program, including the following elements required by the permit that are applicable to the VSU's regulated area:
    a. Applicable field personnel will be provided with biennial training to a in the recognition and reporting of illicit discharges.
    b. Applicable employees will be provided with biennial training in good housekeeping and pollution prevention practices that are to be employed during road, street, and parking lot maintenance.
    c. Applicable employees will be provided with biennial training in good housekeeping and pollution prevention practices that are to be employed in and around maintenance and public works facilities. This will include training on the proper use of de-icing products.
    d. VSU will ensure that employees and contractors who apply pesticides and herbicides are properly trained or certified in accordance with the *Virginia Pesticide Control Act*.

e. VSU will ensure that applicable employees obtain the appropriate certifications as required under the *Virginia Erosion and Sediment Control Law* and its attendant regulations.

f. Applicable employees will be provided with biennial training to in good housekeeping and pollution prevention practices that are to be employed in and around recreational facilities.

g. Appropriate emergency spill response employees will have training in emergency spill response.

Note that the University Police and Chesterfield Fire/EMS provide their own training that meets requirements. VSU will keep documentation on each training event including the training date, the number of employees attending the training, and the objective of the training for a period of three years after each training event.

Measurable Goals

VSU's goal is to implement Pollution Prevention and Good Housekeeping protocols daily to reduce pollutant runoff. The effectiveness of these protocols will be measured by the success of the maintenance of high priority facility SWPPP's, Nutrient Management Plans, and training program. The number of staff trained each year will be the measurable goal by which this program is evaluated.

Annual Reporting Requirements

1. A summary of any written procedures developed or modified in accordance with **Part I.E.6.a and b** during the reporting period;
2. A confirmation statement that all high-priority facilities were reviewed to determine if SWPPP coverage is needed during the reporting period;
3. A list of any new SWPPPs developed in accordance with **Part I.E.6.i** during the reporting period;
4. A summary of any SWPPPs modified in accordance with **Part I.E.6.j, 6.l, or 6.m**;
5. The rationale of any high-priority facilities delisted in accordance with **Part I.E.6.l or m** during the reporting period;
6. The status of each nutrient management plan as of June 30 of the reporting year (e.g., approved, submitted and pending approval, and expired); and
7. A list of the training activities conducted in accordance with **Part I.E.6.d**, including the following information:
    a. The completion date for the training activity;

b. The number of employees who completed the training activity; and

c. The objectives and good housekeeping procedures covered by the training activity.

Special Conditions

Chesapeake Bay TMDL

VSU has prepared a *Chesapeake Bay TMDL Action Plan* (**Table 1**) in accordance with the guidelines set in the Special Condition Guidance Document (Guidance Memo No. 15-2005) developed by DEQ. The College is responsible for achieving 100% Pollutant of Concern (POC) reduction during the Permit Term and by October 31, 2028.

The Action Plan focuses on Nitrogen, and Phosphorus as the pollutants of concern, established by the 2010 TMDL approved by the EPA. These POC loads and reduction calculations are based on the land cover prior to June 30, 2009, or equivalent, for pervious and impervious regulated acres per Table 3a in the permit.

Annual Reporting Requirements

1. Permittees previously covered under the General VPDES Permit for Discharges of Stormwater from MS4 effective November 1, 2018, shall submit a Chesapeake Bay TMDL implementation annual status report in a method (i.e., how the permittee 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.
2. 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.
3. 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 the permittee responded.
4. Each Chesapeake Bay TMDL implementation annual status report shall include the following information:

a. (1) 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;
    i. (a) The number of BMPs for each BMP type;
    ii. (b) The estimated reduction of pollutants of concern achieved by each BMP type and reported in pounds of pollutant reduction per year; and
    iii. (c) A confirmation statement that the permittee electronically reported Chesapeake Bay TMDL action plan BMPs inspected using the DEQ BMP Warehouse in accordance with **Part III.B.5**.
b. (2) 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:
    i. (a) The BMP type and a description of the location for each BMP;
    ii. (b) The estimated reduction of pollutants of concern achieved by each BMP and reported in pounds of pollutant reduction per year; and
    iii. (c) A confirmation statement that the permittee electronically reported BMPs using the DEQ BMP Warehouse in accordance with **Part III.B.3**.

5. If the permittee 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.
6. 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.
7. The progress, using the final design efficiency of the BMPs, toward meeting the required cumulative reductions for total nitrogen and total phosphorus.
8. Any revisions made to the Chesapeake Bay TMDL action plan.
9. A list of BMPs that are planned to be implemented during the next reporting period.

Local TMDLs

VSU's MS4 regulated area discharges stormwater to Fleet's Branch along the east side of campus and to the Appomattox River along the south side of campus. DEQ has developed an EPA approved Bacteria (*E. Coli*) TMDL for the Appomattox River Basin which was last modified on February 2, 2011. VSU has not been assigned a Waste Load Allocation (WLA) for this TMDL, therefore VSU does not have any local TMDL action plans.