

The Peninsula's Community College

Municipal Separate Storm Sewer System Annual Report

Reporting Period: July 1, 2019 to June 30, 2020

Date: October 1, 2020

General Permit No. VAR040087

Effective Date: November 1, 2018 through October 31, 2023.

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Annual Report Certification

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Printed Name: Steven Ray Carpenter

Signature:

Title: Vice President for Finance and Administration

Date: 9/23/20

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Background and Purpose

Thomas Nelson Community College (TNCC) owns and operates a municipal separate storm sewer system (MS4). The college's MS4 consists of features such as curb and gutter, drop inlets, ditches, and stormwater management facilities to convey, treat, and ultimately discharge stormwater runoff to surface waters. The discharge of runoff from the MS4 is regulated under the Clean Water Act, as amended and pursuant to the State Water Control Law and regulations adopted pursuant thereto. TNCC is authorized to discharge stormwater runoff from the Hampton and Historic Triangle campuses' MS4s under the Virginia Stormwater Management Program regulations, Virginia Pollutant Discharge Elimination System Regulations (VPDES), and the Virginia State Water Control Law.

TNCC is authorized to discharge stormwater in accordance with the General VPDES Permit for Discharges of Stormwater from Small MS4s (General Permit). As required by the General Permit, TNCC has developed an MS4 Program Plan that describes the best management practices (BMPs) the college will implement to maintain compliance with the permit. The General Permit also requires TNCC to submit an annual report to the Virginia Department of Environmental Quality (DEQ) no later than October 1st of each year that reports on program implementation from July 1st of the previous year to June 30th of the current year. Consistent with the requirements of the General Permit, this report is annually completed as summarized in Table 1.

Required Information	Location in Report
Permittee, system name, and permit number	Cover Page
Reporting period	Cover Page
Signed Certification	Page 'i'
Annual Reporting item(s) specified for each MCM	Provided for each BMP within the section entitled "Minimum Control Measure Annual Reporting."
Evaluation of the program implementation, effectiveness, and necessary modifications	Provided for each BMP within the section entitled "Minimum Control Measure Annual Reporting." Concerns regarding effectiveness are in Table 2 of the following Section.

Table 1. General information required for annual reporting.

Compliance Summary

Reported information is consistent with the specific annual reporting required in the General Permit and the TNCC MS4 Program Plan, including supplemental information described in the Program Plan to measure effectiveness of each BMP. For use in reference to this annual report, the MS4 Program Plan is provided at the TNCC stormwater management <u>webpage</u>. The Program Plan may be updated or revised from time to time as part of an iterative process to reduce pollutant loadings and protect water quality to the maximum extent practicable (MEP). TNCC has evaluated the effectiveness of each program BMP, as described in the Program Plan. Table 2 summarizes the evaluation to determine if any modifications to the Program Plan are necessary for the subsequent reporting year. If deemed ineffective, please see the reporting for the specific BMP for intended modifications.

BMP # ¹	Description Summary ¹	Effective
1A	Public Education & Outreach	\boxtimes Yes / \Box No
2A	Maintain dedicated webpage	\boxtimes Yes / \Box No
2B	Receive/respond to public reports/input	\boxtimes Yes / \Box No
2C	Public Participation Activities	\Box Yes / \boxtimes No
3A	MS4 Map and Information Table	\boxtimes Yes / \Box No
3B	Prohibition of nonstormwater discharges	\boxtimes Yes / \Box No
3C	Perform dry weather outfall screenings	\boxtimes Yes / \Box No
4A	Implement VCCS Stnds. & Specs for ESC & SWM	\boxtimes Yes / \Box No
4B	Control Non-stormwater discharges (construction)	\boxtimes Yes / \Box No
5A	Implement VCCS Stnds. & Specs for ESC & SWM	\boxtimes Yes / \Box No
5B	Conduct annual SWM Facility Inspections	\boxtimes Yes / \Box No
5C	Update SWM Facility Spreadsheet	\boxtimes Yes / \Box No
5D	Report to DEQ Construction Stormwater Database	\boxtimes Yes / \Box No
6A	Implement Good Housekeeping Procedures	\boxtimes Yes / \Box No
6B	Conduct annual campus-wide SWPPP Evaluation	\boxtimes Yes / \Box No
6C	Maintain Current Nutrient Management Plan	\boxtimes Yes / \Box No
6D	Ensure contract language for controls	\boxtimes Yes / \Box No
6E	Conduct MS4 employee training	\boxtimes Yes / \Box No
SC1	Chesapeake Bay TMDL Action Plan	\boxtimes Yes / \Box No
-	Local TMDL Action Plans	N/A ²

 Table 2. Evaluation summary for each BMP for the reporting year.

¹Refer to BMP section within this program plan for full description and requirements for each BMP.

² TNCC has not been assigned a waste load allocation from a local TMDL; and therefore, is not required to implement a TMDL Action Plan specific to any local TMDLs.

Minimum Control Measure Annual Reporting

Reporting provided for each BMP described in the TNCC MS4 Program Plan to address each MCM is provided below. Information provided is only that explicitly required by the General Permit and the TNCC MS4 Program Plan. Please refer to the Program Plan for additional information for each BMP.

MCM 1: Public Education and Outreach

Annual reporting required for each BMP to address MCM 1, as described in the General Permit and MS4 Program Plan, is provided below.

BMP 1A – Public Education & Outreach Plan

Annual reporting associated with this BMP requires:

- ✓ A list of the high-priority stormwater issues addressed during the reporting year (Table 1A-1).
- ✓ A list of the strategies used to communicate each high-priority stormwater issue (Table 1A-1).
- \checkmark The public survey results described for use as a measure of effectiveness (Table 1A-2).

Table 1A-1. Reporting for high priority stormwater issues addressed during the reporting year.

High Priority Stormwater Issue	Strategy
1. General public education on: (1) stormwater impacts to surface	Traditional Written Materials
waters and (2) steps to reduce pollution.	(brochure)
2. Illicit discharge prohibition/enforcement on the TNCC campus	Media Materials
disciplinary implications, hazards and proper waste disposal.	(Closed circuit TV slides)
3. Increase applicable staff's knowledge regarding pollutants of	Traditional Written Materials
concern for the Chesapeake Bay TMDL.	(brochure)

Table 1A-2. Public survey results used for measure of effectiveness.

Results from Public Survey

Two initial baseline surveys: (1) Focused on material for WQ issues # 1 & #2 distributed to all of the TNCC public. (2) Focused on WQ issue #3 distributed to applicable staff. Next survey to assess improvement of scores will be in the spring of 2021.

Date Distributed:	Number of Respondents:	Average Score:
(1) 4/30/19 and (2) 4/29/19	(1) 63 and (2) 6	(1) 79% and (2) 95%

Summary of BMP Effectiveness based on Program Plan Measurable Goal Does the measure of BMP effectiveness require Program Plan modification? Image: Comparison of the program Plan modification

MCM 2: Public Involvement and Participation

Annual reporting required for each BMP to address MCM 2, as described in the General Permit and MS4 Program Plan, is provided below.

BMP 2A – Dedicated MS4 Webpage

Annual reporting associated with this BMP requires:

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

Table 2A-1. Reporting for high priority stormwater issues addressed during the reporting year.

Dedicated Stormwater Webpage Reporting		
Link to current MS4 Program and Stormwater pollution prevention webpage: <u>https://tncc.edu/about/environment/stormwater</u>		
An annual review of the website conducted to ensure all information required to be posted on the website was performed?		
Description of updates implemented during the reporting year: TNCC has added the latest MS4 Annual Report, the latest version of the VCCS Annual Standards and Specifications for ESC and SWM, and the Phase II Chesapeake Bay TMDL Action Plan.		

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

Annual reporting associated with this BMP requires:

- ✓ Each potential illicit discharge report and percentage of reports closed;
- ✓ Each instance of public input and percent for which TNCC provided response; and
- ✓ Assessment if all illicit discharges were not closed or all input did not receive response.

Illicit Discharge Reports ¹			
Number of instances:	Number of instances closed:	Percent of instances closed:	
0	N/A	N/A	
Public Input on Program Plan ²			
Number of instances:	Number of responses:	Percent of instances responded to:	
0	N/A	N/A	

¹ Illicit discharge reports are provided in Appendix A, if > zero instances.

 2 Public input and response documentation is in Appendix B, if > zero instances.

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	Yes 🔽 No

BMP 2C – Public Involvement/Participation Activities

Annual reporting associated with this BMP requires:

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

Public Involvement/Participation Activities			
Involvement Type ¹	Description of activity ²	Report on the Metric to measure benefit to water quality	Beneficial to Improving water quality?
Educational Events	Stormwater booth at 2019 Fall Fest – Historic Triangle Campus (9/12/19)	47 visitors to booth, 11 stormwater brochures distributed	Ves No
Educational Events	Stormwater booth at 2019 Fall Fest – Hampton Campus (9/26/19)	27 visitors to booth, 12 stormwater brochures distributed	Ves No
Disposal or collection events	Collection of recyclable material transport to material recovery facility (MRF).	384 cubic yards of mixed recycling materials collected & transported to MRF.	Ves No
Educational Events	2020 Spring Fest at each campus canceled due to COVID-19	N/A for spring 2020	Yes No

¹ A minimum of two involvement types must be used annually.

² TNCC did not collaborate with any other MS4 permittees for any of the listed activities.

Summary of BMP Effectiveness based on Program Plan Measurable Goal Does the measure of BMP effectiveness require Program Plan modification? If yes, please described necessary BMP modifications to improve effectiveness: If the restrictions due to COVID-19 continue throughout the upcoming report year, alternative activities will be identified.

MCM 3: Illicit Discharge Detection and Elimination

Annual reporting required for each BMP to address MCM 3, as described in the General Permit and MS4 Program Plan, is provided below.

BMP 3A – Maintain MS4 Map and Information Table

Annual reporting associated with this BMP requires:

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

Certification Statement: MS4 Map & Information Table Updates	Confirm?
"In accordance with the General Permit and the TNCC Program Plan, TNCC confirms as part of this annual report that the MS4 map and information table have been updated to reflect any changes to the MS4 occurring during the reporting year."	Ves

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	Yes 🔽 No

BMP 3B – Prohibition of Unauthorized Nonstormwater Discharges

Annual reporting associated with this BMP includes reporting requirements for BMP 3C, in addition to the following:

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

Illicit Discharge Prohibition Enforcement		
(If applicable, instances are add	ed below of illicit discharges purposefu	ally caused by the TNCC Public)
No. Add Instance	Disciplinary action taken? (Yes / No)	Description of action taken
Total number of instances for current reporting year.		0
Total number of instances for last reporting year.		0
Total number of instances two years previous.		0
Total number of instances three year prior.		0
Does trend indicate the BMP is ineffective?		Yes 🔽 No

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	🗌 Yes 🔽 No

BMP 3C – Maintain, Implement, Enforce IDDE Written Procedures (Includes Screening)

Annual reporting associated with this BMP requires:

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

Outfall Screening & IDDE Procedure Effectiveness	
Total number of outfalls screened as part of dry weather screening program.	11
Total number of TNCC outfalls.	11
Were 100% of outfalls screened during the reporting year?	Yes

Effectiveness Assessment for Addressing Illicit Discharges	
Were all instances of identified illicit discharge listed in Appendix A closed?	None identified.

MCM 4: Construction Site Stormwater Runoff Control

Annual reporting required for each BMP to address MCM 4, as described in the General Permit and MS4 Program Plan, is provided below.

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

Annual reporting associated with this BMP requires:

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

Certification Statement: Adherence to the VCCS Standards & Specifications for ESC

Confirmation Statement: "In accordance with the General Permit and the TNCC Program Plan, TNCC confirms that land disturbing projects that occurred during the reporting period have been conducted in accordance with the latest DEQ-approved standards and specifications for Erosion and Sediment Control."

ESC Inspections & Enforcement Summary

Total number of ESC inspections conducted: N/A - No projects during the reporting year.

Were any enforcement actions taken during the reporting year?

🔽 Yes 🔽 No

Ves

No No

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	TYes Vo

BMP 4B –Controls to Prevent Nonstormwater Discharges during Land Disturbance

Annual reporting associated with this BMP requires:

- ✓ The total number of illicit discharge originating from land disturbance activity of the total illicit discharges reports listed in Appendix A; and
- ✓ Any potential changes to the subsequent annual standards and specifications to prevent future occurrences.

Illicit Discharge from Land Disturbance Activity	
Were there any instances during the reporting period of illicit discharges originating from land disturbance activity?	Yes 🔽 No

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	TYes 🔽 No

MCM 5: Post-construction SWM for Development

Annual reporting required for each BMP to address MCM 5, as described in the General Permit and MS4 Program Plan, is provided below. Please refer to the TNCC MS4 Program Plan for specific BMP information.

BMP 5A – Address Post-construction Stormwater Runoff

Annual reporting associated with this BMP requires:

✓ A confirmation statement that land disturbing projects that occurred during the reporting period have been conducted in accordance with the current DEQ-approved standards and specifications for SWM.

Certification Statement: Adherence to the VCCS Standards & Specifications for SWM	
Confirmation Statement: "In accordance with the General Permit and the TNCC Program Plan, TNCC confirms that land disturbing projects that occurred during the reporting period have been conducted in accordance with the latest DEQ-approved standards and specifications for Stormwater Management."	Ves

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	TYes Vo

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

Annual reporting associated with this BMP requires:

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

SWM Facility Inspections and Maintenance	
Total number of inspections conducted on SWM facilities for the reporting year is: 2	
Was at least one inspection performed on each TNCC SWM facility during the reporting year?	Yes No
Were any significant maintenance, repair, or retrofit activities necessary to ensure the BMP performs as designed as a result of inspection?	Yes No
 Provide the BMP ID and a description of any significant maintenance, including an assessment of the timeliness of the needed actions. BMP #1: A minor breach along the easterly berm, about 80' south of the weir outfall, was repaired and stabilized. 	

BMP 5C – Maintain SWM Facilities Spreadsheet

No annual reporting necessary (see reporting for BMP 5D)

BMP 5D –SWM Facilities Reporting to DEQ

Annual reporting associated with this BMP requires:

- ✓ A confirmation statement that either: (1) TNCC submitted SWM facility information through the Virginia Construction Stormwater General Permit database for those land disturbing activities for which coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities was required or (2) TNCC did not complete any projects requiring coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities.
 - If information was not submitted, an explanation as to why with a schedule for submission of the required information.
- ✓ A confirmation statement that TNCC electronically reported, no later than the submission date of this annual report, SWM facilities and BMPs implemented between July 1 and June 30 using the DEQ BMP Warehouse that were installed to control post-development stormwater runoff from land disturbing activities less than one acre in accordance with the Chesapeake Bay Preservation Act regulations (9VAC25-830) and for which a General VPDES Permit for Discharges of Stormwater from Construction Activities was not required and the date on which the information was submitted.
 - If information was not submitted, an explanation as to why with a schedule for submission of the required information.

Certification Statement: Report to Virginia Construction Stormwater General Permit Database	
(Applicable for Reporting Year)	
Confirmation Statement: "TNCC submitted SWM facility information through the Virginia Construction Stormwater General Permit database for those land disturbing activities for which coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities was required in accordance with the VCCS Standards and Specifications for ESC and SWM."	Yes No ✓ N/A

¹ Not applicable since no projects were completed during the reporting year that required coverage; or if an applicable project was completed, a stormwater management facility was not installed as part of the project. See following certification statement.

BMP 5D –SWM Facilities Reporting to DEQ (continued)

Certification Statement: Report to Virginia Construction Stormwater General Permit Database	
(Not Applicable for Reporting Year)	
Confirmation Statement: "TNCC either did not complete any projects during the	Marked box
reporting period requiring coverage under the General VPDES Permit for Discharges	below is
of Stormwater from Construction Activities; or, if a project was completed, a	confirmation
stormwater management facility was not installed as part of the project."	\boxtimes

Certification Statement: Reporting to the DEQ BMP Warehouse		
Confirmation Statement: "TNCC reported, prior to submission of this annual report, stormwater management facilities and BMPs implemented between July 1 and June 30 of the reporting period using the DEQ BMP Warehouse that were installed to control post-development stormwater runoff from land disturbing activities less than one acre in accordance with the Chesapeake Bay Preservation Act regulations (9VAC25-830) and for which a General VPDES Permit for Discharges of Stormwater from Construction Activities was not required ."	Yes No	
Certification Statement: Report to the DEQ BMP Warehouse (Not Applicable for Reporting Year)		
Confirmation Statement: "TNCC did not install SWM facilities and BMPs to contropost-development stormwater runoff from land disturbing activities less than one activities with the Chesapeake Bay Preservation Act regulations (9VAC25-830) and for which a General VPDES Permit for Discharges of Stormwater from Construction Activities was not required"	re Marked box	

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	TYes Vo

MCM 6: Pollution Prevention & Good Housekeeping for Facilities

Annual reporting required for each BMP to address MCM 6, as described in the General Permit and MS4 Program Plan, is provided below. Please refer to the TNCC MS4 Program Plan for specific BMP information.

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

Annual reporting associated with this BMP requires:

- ✓ A description of any illicit discharges originating from campus operations and maintenance activities, provided in reporting for BMP 3C; and
- ✓ A summary of any modifications to operational procedures in the *TNCC Staff Handbook of Good Housekeeping and Pollution Prevention* to prevent future occurrences of illicit discharge(s), if applicable.

Effectiveness of Program to Prevent Illicit Discharges from Campus Operations		
Were there any illicit discharges from BMP 3C reporting that originated from campus operations of maintenance activities?	Yes 🔽 No	

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	TYes 🔽 No

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

Annual reporting for this BMP requires a summary of the annual campus assessment to determine if a SWPPP is required based on the criteria described in the General Permit that defines high priority facilities that have high potential of discharging pollutants.

Annual Campus SWPPP Assessment Results	
Was an annual evaluation to determine if a SWPPP is required performed?	Ves 🔽 No
If yes, is a SWPPP required?	TYes M No

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	🏹 Yes 🔽 No

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

Annual reporting for this BMP will include a summary of any new NMPs developed, including

- \checkmark Locations and total acreage for where the NMP applies; and the
- \checkmark Date of the latest DCR approval for the NMP.

Nutrient Management		
Did TNCC apply nutrients during the reporting year?	Yes 🔽 No	
TNCC has, and implements, a Nutrient Management Plan for the Hampton campus for a total of 23.3 acres that was approved by the Department of Conservation and Recreation on July 27, 2018 and is valid through July 27, 2021.		
TNCC has, and implements, a Nutrient Management Plan for the Historic Triangle campus for a total of 8.0 acres that was approved by the Department of Conservation and Recreation on July 27, 2018 and is valid through July 27, 2021.		

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	🏹 Yes 🔽 No

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

Annual reporting for this BMP requires:

- \checkmark The number of illicit discharges originating from contractor activities.
- ✓ Summary of assessment to modify procurement procedures or the *TNCC Staff Handbook of Good Housekeeping and Pollution Prevention* to prevent future instances.

Were there any illicit discharges during the reporting period that originated from	Yes 🔽 No
contractor activities?	

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	Yes 🔽 No

BMP 6E – Training Plan for Applicable Employees

Annual reporting associated with this BMP requires:

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

Good Housekeeping/Pollution Prevention Training		
Date of latest training event:		July 13, 2020
Date of previous training:		July 19, 2018
Has training continued to be provided a minimum of once every 24 months?		Yes No
Number of employees that attended the latest training event.		14
Number of employees identified to be required to participate in training (as defined by the general permit and program plan).		14
Percent of those identified that attended training.		100%
Did the percentage of those identified to be required to attend training attend?		Ves No
A description of the objective of the latest training event:		
Familiarize staff with the MS4 program, recognition and reporting of illicit discharges, the Staff		
Handbook for Good Housekeeping and Pollution Prevention, and priority areas on campus.		
Average quiz score from latest training event.		rease from 75%
		with last training

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	🔽 Yes 🔽 No

Special Conditions for Total Maximum Daily Load Waste Load Allocations

Annual reporting required for each BMP to address Special Conditions for TMDLs, as described in the General Permit, is provided below.

BMP SC1 – Chesapeake Bay TMDL Action Plan

Annual reporting associated with this BMP requires the following:

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

Chesapeake Bay TMDL Action Plan Annual Reporting

Street sweeping was implemented in accordance with the Phase II Action Plan, developed this reporting year. A total of 13.0 tons of debris was collected for the reporting period. Equivalent TP, TN, and TSS reductions are based on results of sampling of swept material by MS4s statewide, including TNCC, as presented by Hixon and Dymond (2019) in the manuscript entitled, "Characterization of Street Sweeping Material for Addressing Total Maximum Daily Load Allocations" as published by the ASCE Journal of Sustainable Water in the Built Environment. DOI: 10.1061/JSWBAY.0000882. (Calculations for parking lots, ≥ 2 days since rain, as recorded on data collection forms). Additional sample collection and analysis continues as a measure of effectiveness in conjunction with several MS4s. Continued sampling and analysis has been refined based on recommendations by Hixon and Dymond (2019) for TP and TN concentration just on the fraction of material susceptible to runoff, as defined in the study as particles < 840 µm observed to be transported downstream during rainfall. Since the values from Hixon and Dymond (2019) are estimates based on sampling of *all* material collected, median values of the refined analysis will be used for computing reductions as the dataset becomes larger. Sampling and analysis will continue and sweeping efforts modified as needed, towards achieving the required reductions reflected below.

Pollutant	Annual Reductions Required by 2023 (lbs/yr)	Reductions achieved this year (lbs.)
TN	15.0	8.28
ТР	4.15	4.25
TSS	1,483	17,368
Are reductions progressing to achieve targets?		Yes
Were any modifications made to the action plan?		No