

**VPDES MUNICIPAL SEPARATE STORM
SEWER SYSTEM (MS4)
PERMIT NO. VA40094**

**ANNUAL REPORT
PERIOD JULY 1, 2021 TO JUNE 30, 2022**

THE UNIVERSITY OF MARY WASHINGTON



September 30, 2022

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1.0 SIGNED CERTIFICATION AS PER PART III K:

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.

 _____  _____
Responsible Official Signature Date

Paul Messplay
VP for Admin & Finance & CFO

VAR040094

Permit Number

University of Mary Washington

MS4 Name

2.0 INTRODUCTION

The University of Mary Washington was issued an MS4 permit by the Commonwealth of Virginia. This permit sets forth minimum requirements for the operation of the university's storm sewer system, including storm water treatment systems (BMPs), and is reissued every five years. Oversight of the permit has changed from DCR to DEQ. The permit requires an annual report to be submitted to Virginia DEQ by October 1, 2022 describing progress on meeting permit requirements during the period July 1, 2021 to June 30, 2022.

3.0 ANNUAL REPORTING REQUIREMENTS - COMPLIANCE SUMMARY

In Part I section D of the MS4 permit, the permit lists specific items to be addressed in the Annual Report. The following are the items listed in the permit in italic typeface followed by responses in bold typeface:

Part I Section D2

2. *The annual report shall include the following general information:*

a) *The permittee, system name, and permit number;*

Response: Permittee & System name: University of Mary Washington

Permit number: VAR040094

b) *The reporting period for which the annual report is being submitted;*

Response: July 1, 2021 to June 30, 2022

c) *A signed certification as per Part III K;*

Response: See Section 1 for signed certification.

d) *Each annual reporting item as specified in an MCM in Part I E; and*

Response: See Section 4 for specified annual reporting items for each MCM.

e) *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.*

Response: The current MS4 program implementation has been effective in providing compliance with the permit requirements. No changes to the MS4 program plan are required, however the university continues to improve internal procedures. See evaluation of each MCM at the end of each MCM section.

4.0 MINIMUM CONTROL MEASURES REPORTING

4.1 Public education and outreach

In Part I section E-1-g of the MS4 permit, the permit lists specific items to be addressed in the Annual Report. The following are the items listed in the permit in italic typeface followed by responses in bold typeface:

Part I section E-1-g

g. The annual report shall include the following information:

- 1. A list of the high-priority stormwater issues the permittee addressed in the public education and outreach program; and*

Response: The high priority water quality issues identified by the university are: proper collection and disposal of pet waste, proper disposal of human-generated litter, stormwater reuse strategies which incorporate Virginia Native Plant Materials.

- 2. A list of the strategies used to communicate each high-priority stormwater issue.*

Response: The permit requires two or more of the following strategies per year to communicate to the public the high-priority stormwater issues identified above: traditional written materials, alternative materials, signage, media materials, speaking engagements, curriculum materials, and training materials. Below is a summary of activities with required information:

High-Priority Water Quality Issue	Education and Outreach Activities	Target Audience	Percentage of Target Audience Reached	Documentation
Pet Waste	Permanent Signage	Pet Owners	100% of students, faculty, and staff	UMW maintains four Pet Waste Stations on Campus and routinely monitors / refreshes supplies
Human generated litter	Radio and curriculum materials were used to community with the student body	Students, faculty, and staff	100% of students, faculty, and staff	Butts are Liter Too Campaign, 2022 UMW Earth Day 4/22/2022, COAR/NEST Campus Cleanup 8/17/21, COAR Old Mill Park/ River Clean Up 10/30/21, Into the streets 9/18/21, Pay it Forward Day 11/9/21, Rappahannock River Clean up and Wild & Scenic Film Festival 3/26/22
Stormwater reuse strategies which incorporate Virginia Native Plant Materials	Speaking engagements and training materials	Students, faculty, and staff	100% of students, faculty, and staff	UMW Tree Festival / Arbor Day Planting at Arrington Hall April 20, 2022

MCM Evaluation: The MCM is effective in ensuring regulatory compliance. No changes are planned at this time.

4.2 Public involvement and participation

In Part I section E-2-f of the MS4 permit, the permit lists specific items to be addressed in the Annual Report. The following are the items listed in the permit in italic typeface followed by responses in bold typeface:

Part I section E-2-f

f. The annual report shall include the following information:

- 1. A summary of any public input on the MS4 program received (including stormwater complaints) and how the permittee responded;*

Response: No public input was received during the reporting cycle.

- 2. A webpage address to the permittee's MS4 program and stormwater website;*

Response: This Annual Report, including the current MS4 Program Plan will be posted to the following link within 30 days of submittal of this Annual Report to DEQ:

<https://adminfinance.umw.edu/facilities/storm-water-management-ms4-program/ms4-annual-report/>

- 3. A description of the public involvement activities implemented by the permittee;*

Response: The permit requires the university to implement no less than four activities per year from two or more of the following categories: monitoring, restoration, educational events, disposal or collection events, and pollution prevention. Refer to University MS4 webpage for public involvement activities:

<https://adminfinance.umw.edu/facilities/storm-water-management-ms4-program/public-involvement-opportunities/>

- 4. A report of the metric as defined for each activity and an evaluation as to whether or not the activity is beneficial to improving water quality; and*

Response: The metric for activities is the number of participants compared to the total university community. It is estimated that knowledge of these activities have reached almost 100% of the university community with participation varying depending on time of year. There is no documented statistical evidence that these activities have improved water quality, however many of these activities include litter pick up on campus and neighboring streams which helps highlight the connection between human waste and the health of natural waterways.

5. *The name of other MS4 permittees with whom the permittee collaborated in the public involvement opportunities.*

Response: No other MS4 permittees were involved in the listed public involvement opportunities.

MCM Evaluation: The MCM is effective in ensuring regulatory compliance. No changes are planned at this time.

4.3 Illicit discharge detection and elimination

In Part I section E-3-e of the MS4 permit, the permit lists specific items to be addressed in the Annual Report. The following are the items listed in the permit in italic typeface followed by responses in bold typeface:

Part I section E-3-e

e. The annual report shall include:

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

Response: There MS4 map has been updated based on locations of recent construction or newly acquired properties. A link to the updated MS4 map can be found here: <https://adminfinance.umw.edu/facilities/storm-water-management-ms4-program/>.

2. *The total number of outfalls screened during the reporting period as part of the dry weather screening program; and*

Response: During the reporting period, the university screened all of its 31 outfalls. There were no signs of illicit discharges and no follow-up actions were required.

3. *A list of illicit discharges to the MS4 including spills reaching the MS4 with information as follows:*
 - a. *The 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.*

Response: During the reporting period, there were no illicit discharge events where prohibited discharges reached the storm sewer system.

MCM Evaluation: The MCM is effective in ensuring regulatory compliance. No changes are planned at this time.

4.4 Construction site stormwater runoff control

In Part I section E-4-e of the MS4 permit, the permit lists specific items to be addressed in the Annual Report. The following are the items listed in the permit in italic typeface followed by responses in bold typeface:

Part I section E-4-e

d. The annual report shall include the following:

1. *If the permittee implements a construction site stormwater runoff program in accordance with Part I E 4 a (3):*

- a. *A confirmation statement that land disturbing projects that occurred during the reporting period have been conducted in accordance with the current department approved standards and specifications for erosion and sediment control; and*

Response: All projects were conducted in accordance with the current Annual Standards and Specifications.

- b. *If one or more of the land disturbing projects were not conducted with the department approved standards and specifications, an explanation as to why the projects did not conform to the approved standards and specifications.*

Response: Not applicable, see above.

2. *Total number of inspections conducted; and*

Response: There were 98 inspections conducted by the university's ESC Inspector. Inspections are conducted every two weeks and within 48 hours of a rainfall event.

3. *The total number and type of enforcement actions implemented and the type of enforcement actions.*

Response: As the university is the contract holder for all of the land disturbance activities on campus and the ESC inspector represents the university, any deficiencies in ESC measures or practices are resolved immediately. There were no enforcement actions taken during the reporting period.

MCM Evaluation: The MCM has been effective in providing compliance with the regulatory requirements.

4.5 Post-construction stormwater management for new development and development on prior developed lands

In Part I section E-5-i of the MS4 permit, the permit lists specific items to be addressed in the Annual Report. The following are the items listed in the permit in italic typeface followed by responses in bold typeface:

Part I section E-5-i

i. The annual report shall include the following information:

1. If the permittee implements a Virginia Stormwater Management Program in accordance with Part I E 5 a (1) and (2):

a. The number of privately owned stormwater management facility inspections conducted; and

Response: N/A, all stormwater management facilities are owned by the university.

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;

Response: N/A, all stormwater management facilities are owned by the university.

2. Total number of inspections conducted on stormwater management facilities owned or operated by the permittee;

Response: All stormwater management facilities owned and operated by the university were inspected during the reporting period. There are a total of 33 stormwater management facilities at the three campuses.

- 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;*

Response: Improvements were made to an existing stormwater junction box near Route 1 and UMW recreational fields. UMW is in the design phase of improving a stream channel near Woodard Hall.

- 4. 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 I E 5 f 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; and*

Response: UMW has been in correspondence with William Keeling from DEQ and is actively in the process of providing all required information to DEQ. The most recent update was after this reporting period.

- 5. A confirmation statement that the permittee electronically reported BMPs using the DEQ BMP Warehouse in accordance with Part I E 5 g and the date on which the information was submitted.*

Response: UMW has been in correspondence with William Keeling from DEQ and is actively in the process of providing all required information to DEQ. The most recent update was after this reporting period.

MCM Evaluation: The MCM is effective in ensuring regulatory compliance. No changes are planned at this time.

4.6 Pollution prevention and good housekeeping for facilities owned or operated by the permittee within the MS4 service area.

In Part I section E-6-q of the MS4 permit, the permit lists specific items to be addressed in the Annual Report. The following are the items listed in the permit in italic typeface followed by responses in bold typeface:

Part I section E-6-q

q. The annual report shall include the following:

- 1. A summary of any operational procedures developed or modified in accordance with Part I E 6 a during the reporting period;*

Response: The policy for Illicit Discharge Detection and Elimination has been updated, see attached.

- 2. A summary of any new SWPPPs developed in accordance Part I E 6 c during the reporting period;*

Response: There have been no new SWPPP's developed during the reporting period.

- 3. A summary of any SWPPPs modified in accordance with Part I E 6 f or the rationale of any high priority facilities delisted in accordance with Part I E 6 h during the reporting period;*

Response: The Physical Plant SWPPP was reviewed and updated to reflect current assignment of personnel and division of responsibilities for both buildings and grounds associated with the Physical Plant at Facilities Services. In addition, the site plan is being updated to reflect the additional of visitor parking spaces and associated stormwater BMP structure that was provided to support the parking.

A summary of any new turf and landscape nutrient management plans developed that includes:

- a. Location and the total acreage of each land area; and*
- b. The date of the approved nutrient management plan; and*

Response: There were no new turf and landscape nutrient management plans required to be developed during the reporting period.

4. *A list of the training events conducted in accordance with Part I E 6 m, including the following information:*

- a. *The date of the training event;*
- b. *The number of employees who attended the training event; and*
- c. *The objective of the training event.*

Response: Below is a summary of training activities with required information:

Training Event	Date	Number of Employees	Training Event Objective
Online W'boro Workshop Webinar Series	9/1/22, 9/8/22,9/15/22,9/22/22	1	Continuing Education
Chesapeake Bay Landscape Professional Classes and Field Practicum	3/2/22-3/15/22	1	BMP inspection/verification training
MS4 Training	3/24/22	3	MS4 Overview with City of Fredricksburg

As part of UMW's Snow & Ice Training in December 2021, Facilities Personnel were instructed as to application and minimizing the use of salts, avoidance of other chemicals during storm responses and ensuring that the application of sand for traction be kept to a minimum both on pedestrian and vehicular routes to prevent runoff entering storm sewer system. However, the more comprehensive Good Housekeeping refresher training was not held this past reporting period. UMW intends to conduct an in-house training for all Facilities Personnel on Stormwater Good Housekeeping (attached) this Fall semester and

will include this training and document as part of indoctrination for all new UMW personnel.

MCM Evaluation: The MCM is not currently effective in ensuring regulatory compliance. As noted in the response above, UMW is in the process of implementing more formal staff training.

5.0 CHESAPEAKE BAY TMDL STATUS REPORT

In Part II section A-13 of the MS4 permit, the permit lists specific items to be addressed in the Annual Report. The following are the items listed in the permit in italic typeface followed by responses in bold typeface:

Part II section A-13

13. *For each reporting period, the corresponding annual report shall include the following information:*

- a) *A list of BMPs implemented during the reporting period but not reported to the DEQ BMP Warehouse in accordance with Part I E 5 g and the estimated reduction of pollutants of concern achieved by each and reported in pounds per year;*

Response: There was no BMP's implemented during the reporting period, therefore none were reported to DEQ BMP Warehouse.

- b) *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;*

Response: Credits were not acquired during the reporting period

- c) *The progress, using the final design efficiency of the BMPs, toward meeting the required cumulative reductions for total nitrogen, total phosphorus, and total suspended solids; and*

Response: All required cumulative reductions for total nitrogen, total phosphorus, and total suspended solids have been met.

- d) *A list of BMPs that are planned to be implemented during the next reporting period.*

Response: There are no planned BMP's planned to be implemented during the next reporting period for compliance with the Chesapeake Bay TMDL.

6.0 LOCAL TMDL STATUS REPORT

In Part II section B-9 of the MS4 permit, the permit lists specific items to be addressed in the Annual Report. The following are the items listed in the permit in italic typeface followed by responses in bold typeface:

Part II section B-9

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

Bacteria TMDL for the Tidal Freshwater Rappahannock River Watershed

The university is continuing existing efforts documented in the TMDL Action Plan including maintaining four Pet Waste facilities on the Fredericksburg campuses and maintaining a full staff of grounds and maintenance personnel who are trained to follow good housekeeping practices. UMW does not operate or maintain a sanitary sewer system nor does the University utilize septic systems therefore Urban run-off (pet waste and facilities) and wildlife are the only likely sources applicable to the UMW campuses.

Monitoring is not required, and no monitoring is currently being conducted as part of TMDL compliance.

7.0 CONDITIONS APPLICABLE TO ALL STATE AND VPDES PERMITS

7.1 Reporting Monitoring Results

In Part III section C-1 of the MS4 permit, the permit lists specific items to be addressed in the Annual Report. The following are the items listed in the permit in italic typeface followed by responses in bold typeface:

Part III section C-1

1. The operator shall submit the results of the monitoring as may be performed in accordance with this state permit with the annual report unless another reporting schedule is specified elsewhere in this state permit.

Response: N/A, no monitoring took place during the reporting period.

7.2 Reporting of noncompliance

In Part III section I-3 of the MS4 permit, the permit lists specific items to be addressed in the Annual Report. The following are the items listed in the permit in italic typeface followed by responses in bold typeface:

Part III section I-3

3. The operator shall report all instances of noncompliance not reported under Part III I 1 or 2, in writing, as part of the annual reports that are submitted. The reports shall contain the information listed in Part III I 2.

NOTE: The reports required in Part III G, H, and I shall be made to the department. Reports may be made by telephone, email, or fax. For reports outside normal working hours, leaving a recorded message shall fulfill the immediate reporting requirement. For emergencies, the Virginia Department of Emergency Management maintains a 24-hour telephone service at 1-800-468-8892.

Response: UMW is in the process of implementing additional staff training to improve compliance of Part I E 6. See Section 4 of this Report.

7.3 Signatory requirements

In Part III section K-2 of the MS4 permit, the permit lists specific items to be addressed in the Annual Report. The following are the items listed in the permit in italic typeface followed by responses in bold typeface:

Part III section K-2

2. Reports and other information. All reports required by state permits, including annual reports, and other information requested by the board or department shall be signed by a person described in Part III K 1, or by a duly authorized representative of that person. A person is a duly authorized representative only if:

- a) The authorization is made in writing by a person described in Part III K 1;*
- b) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the operator. (A duly authorized representative may thus be either a named individual or any individual occupying a named position.); and*
- c) The signed and dated written authorization is submitted to the department.*

Response: See Section 1 of this report.