

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

**ANNUAL REPORT
PERIOD JULY 1, 2022 TO JUNE 30, 2023**

THE UNIVERSITY OF MARY WASHINGTON

**University of
Mary Washington**

September 30, 2023

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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.

09/27/2023

Responsible Official Signature

Date

Craig Erwin

VP for Admin & Finance & CFO

VAR040094

Permit Number

University of Mary Washington

MS4 Name

2.0 INTRODUCTION

The University of Mary Washington (UMW) was originally issued an MS4 permit in 2003 by the Commonwealth of Virginia. This permit sets forth minimum requirements for the operation of UMW's storm sewer system, including storm water treatment systems, and is reissued every five years. The UMW's current permit number is VAR040094, and the current permit cycle duration is from November 1, 2018, to October 31, 2023. The permit mandates an annual report to be submitted to Virginia DEQ by October 1st during the permit cycle, detailing progress in meeting permit requirements from July 1st to June 30th of the previous year. This annual report encompasses UMW's progress in meeting the permit requirements for the period from July 1, 2022, to June 30, 2023.

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

1. *The permittee shall submit an annual report to the department no later than October 1 of each year in a format as specified by the department. The report shall cover the previous year from July 1 to June 30.*

Response: Understood! UMW submits MS4 annual reports to DEQ no later than October 1 of each year. This annual report specifically covers the period from July 1, 2022, to June 30, 2023.

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, 2022 to June 30, 2023

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

Response: See Section 1 on page 1 for signed certification.

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

Response: See Section 4 on page 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 its internal procedures. See evaluation of each MCM at the end of each MCM section.

3. *For permittees receiving initial coverage under this general VPDES permit for the discharge of stormwater, the annual report shall include a status update on each component of the MS4 program plan being developed. Once the MS4 program plan has been updated to include implementation of a specific MCM in Part I E, the permittee shall follow the reporting requirements established in Part I D 2.*

Response: UMW currently holds permit number VAR040094. UMW's annual report adheres to the reporting requirements outlined in Part I D 2.

4. *For those permittees with requirements established under Part II A, the annual report shall include a status report on the implementation of the Chesapeake Bay TMDL action plan in accordance with Part II A of this permit including any revisions to the plan.*

Response: This annual report includes a status report on the implementation of the Chesapeake Bay TMDL action plan in accordance with Part II A of this permit. See section 5.0 of this annual report on page 13 for Chesapeake Bay TMDL action plan status report.

5. *For those permittees with requirements established under Part II B, the annual report shall include a status report on the implementation of the local TMDL action plans in accordance with Part II B including any revisions to the plan.*

Response: This annual report includes a status report on the implementation of the local TMDL action plan in accordance with Part II B of this permit. See section 6.0 of this annual report on page 14 for local TMDL action plan status report.

6. *For the purposes of this permit, the MS4 program plan and annual report shall be maintained separately and submitted to the department as required by this permit as two separate documents.*

Understood! The MS4 program plan and annual report are maintained and submitted to the department as two separate documents.

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 and addressed during this reporting period by UMW are:

- Proper collection and disposal of pet waste,**
- Proper disposal of human-generated litter, and**
- 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
Proper Collection and Disposal of Pet Waste	Permanent Signage	Pet Owners	100% of students, faculty, and staff and surrounding community	UMW maintains four Pet Waste Stations on Campus and routinely monitors / refreshes supplies
Human generated litter	Sustainability and Campus Activities offices and curriculum materials were used to communicate with the student body	Students, faculty, and staff	100% of students, faculty, and staff	Rappahannock River Service Day (FOR) 10/22/22, Pay it Forward Day 10/29/22, <i>Wild & Scenic</i> Litter Clean Up (students w/ City) 3/26/23, UMW Earth Day 4/14/2023, COAR/NEST Campus Cleanup 8/16/23, Into the Streets 9/24/22, and Wild & Scenic Film Festival 4/15/23
Stormwater reuse strategies which incorporate Virginia Native Plant Materials	Speaking engagements, posters and training materials	Students, faculty, and staff	100% of students, faculty, and staff	UMW Tree Festival 9/29/22 / Arbor Day Planting (9 river birch) along creek and at Woodard Eagle's Nest, April 10, 2023

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 UMW 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 UMW 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 has reached almost 100% of the university community with participation varying depending on time of the year. There is no documented statistical evidence that these activities have improved water quality, however many of these activities include, river and community clean ups to pick up litter 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: The MS4 maps and information tables were updated in April 2022 based on locations of recent construction or newly acquired properties. A link to the updated MS4 maps and information tables can be found here:

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

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, UMW's consultant screened all of the University's 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 land disturbing projects that occurred during this reporting period have been conducted in accordance with the University's current Annual Standards and Specifications for erosion and sediment control.

- 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 72 inspections conducted by UMW'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: Not applicable because UMW is a public institution and not a city, county, or town and all stormwater management facilities are owned, operated, and maintained by UMW.

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, see response to above item. All stormwater management facilities are owned, operated, and maintained by UMW.

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 UMW were inspected during the reporting period. There are a total of 33 stormwater management facilities across the three campuses. UMW will prepare a prioritized plan to address the deficiencies identified during this reporting period in the next year's period.

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: UMW relined a section of stormwater pipeline running under a synthetic turf field at the Battleground Athletic Complex. The relined storm pipe consisted of two 18-inch CMP sections, each approximately 120 feet in length.

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 submitted all SWM facilities information to DEQ for those projects that required VPDES Permit.

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: N/A. All BMPs were reported in accordance with Part I E 5 f.

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: No operational procedures developed or modified during this reporting period.

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

Response: There has 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: No SWPPP has been modified during this reporting period.

- 4. 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.

- 5. 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
Pollution Prevention and Good Housekeeping	October 10 – 24, 2022	All 53 Facilities Services Personnel	<p>UMW conducted an in-house training to its employees in October 2022 to:</p> <ul style="list-style-type: none"> • stress the importance of being AWARE of and ALERT to conditions that could result in the discharge of pollutants in storm water. • prevent pollution and maintain good housekeeping. • provide an immediate response to spills. • be aware of the requirement of the University of Mary Washington’s MS4 permit; and • be good public stewards.

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

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 BMPs 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 Fredericksburg campus and maintaining a full staff of grounds and maintenance personnel who are trained to follow good housekeeping practices. In addition, UMW does not operate or maintain a sanitary sewer system nor does it 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: There were no instances of noncompliance to report during this reporting period. In addition, UMW is in the process of implementing additional staff training to improve compliance of Part I E 6. See Section 4 starting on page 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 on page 1 of this report.