

# **Municipal Separate Storm Sewer System Annual Report**

Reporting Period: July 1, 2022 to June 30, 2023

Due Date: October 1, 2023

Revision Date: January 23, 2024

General Permit No. VAR040109

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



## **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."

Printe	d Name: /	YONZ	10 LONES	)
Signa	ture:	<u> </u>	Jones	
Title:	FAC		ES MGR	
Date:	09	121	2023	

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## **Background and Purpose**

Danville Community College (DCC) 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. DCC is authorized to discharge stormwater runoff from the Danville campus's MS4 under the Virginia Stormwater Management Program Regulations, Virginia Pollutant Discharge Elimination System Regulations (VPDES), and the Virginia State Water Control Law.

DCC 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, DCC 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 DCC 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 to June 30th of the previous year. Consistent with the requirements of the General Permit, this annual report is annually completed as summarized in Table 1.

Table 1. General information required for annual reporting.

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.

## **Compliance Summary**

The following sections include the specific annual reporting required for each of the BMPs described in the DCC MS4 Program Plan. Reported information includes the specific annual reporting required in the General Permit, along with supplemental information described in the Program Plan, as applicable, to measure effectiveness of each BMP. For use in reference to this annual report, the Program Plan is provided at the DCC stormwater management webpage. 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 MEP.

DCC has evaluated the effectiveness of each program BMP, as described in the Program Plan and as applicable. Table 2 summarizes the evaluation any modifications to the MS4 Program Plan that DCC will provide in the subsequent reporting year.

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

BMP # 1	Description Summary <sup>1</sup>	Effective? <sup>2</sup>
1A	Public Education & Outreach	⊠Yes / □No
2A	Maintain dedicated webpage	⊠Yes / □No
2B	Receive/respond to public reports/input	$\boxtimes$ Yes / $\square$ No
2C	Public Participation Activities	⊠Yes / □No
3A	MS4 Map and Information Table	⊠Yes / □No
3B	Prohibition of non-stormwater discharges	$\boxtimes$ Yes / $\square$ No
3C	Perform dry weather outfall screenings	⊠Yes / □No
4A	Implement VCCS Stnds. & Specs for ESC & SWM	⊠Yes / □No
4B	Control Non-stormwater discharges (construction)	$\boxtimes$ Yes / $\square$ No
5A	Implement VCCS Stnds. & Specs for ESC & SWM	⊠Yes / □No
5B	Conduct annual SWM Facility Inspections	$\boxtimes$ Yes / $\square$ No
5C	Update SWM Facility Spreadsheet	$\boxtimes$ Yes / $\square$ No
5D	SWM Facility Reporting to DEQ	⊠Yes / □No
6A	Implement Good Housekeeping Procedures	⊠Yes / □No
6B	Conduct annual campus-wide SWPPP Evaluation	$\boxtimes$ Yes / $\square$ No
6C	Maintain Current Nutrient Management Plan	$\boxtimes$ Yes / $\square$ No
6D	Ensure contract language for controls	$\boxtimes$ Yes / $\square$ No
6E	Conduct MS4 employee training	⊠Yes / □No

<sup>&</sup>lt;sup>1</sup> Refer to BMP section within this program plan for full description and requirements for each BMP.

<sup>&</sup>lt;sup>2</sup> Refer to BMP section within this program plan for reporting on measure of effectiveness, as applicable.

## **Minimum Control Measure Annual Reporting**

Reporting provided for each BMP described in the DCC MS4 Program Plan to address each MCM is provided below. Information provided is only that explicitly required by the General Permit and the DCC 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).
- ✓ 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	Traditional Written Materials
surface waters and (2) steps to reduce pollution.	(brochure)
2. Illicit discharge prohibition/enforcement on the DCC campus	Media Materials (Closed circuit
disciplinary implications, hazards and proper waste disposal.	TV slides)
3. Increase applicable staff's knowledge regarding pollutant of	Traditional Written Materials
concern for Dan River TMDL.	(brochure)

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

Results from Public Survey (Distributed via Email)			
Three surveys in permit cycle: (1) Focused on material for WQ issues # 1 & #2 distributed to the DCC public (~2,500). (2) Focused on WQ issue #3 distributed to 4 field staff. Results below show an initial increase in scores between 2019-2021 and then a decrease in 2023. DCC will assess the program in context to the new general permit to look for opportunity to improve effectiveness.			
Date Distributed: <i>Public Survey: 2019, 2021, 2023 Staff Survey: 2019, 2021, 2023</i>	Number of Respondents (& year): 122 (2019), 39 (2021), 45 (2023) 17 (2019), 4 (2021), 4 (2023)	Average Score & Year: 65% (2019), 73% (2021), 68% (2023) 86% (2019), 95% (2021), 70% (2023)	

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

## 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 DCC MS4 Program and stormwater pollution prevention webpage address and a description of updates implemented within the reporting year (Table 2A-1).
- ✓ 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 websattps://danville.edu/storm-water-management	page:		
An annual review of the website finds all information required to be posted on the website has been maintained with the latest version of program documents required to be posted by the General Permit.	<b>✓</b> Yes	□ No	
Description of updates implemented during the reporting year:  DCC added the 2021-2022 MS4 Annual Report, as required per the permit.			
Summary of BMP Effectiveness based on Program Plan Measurable Goal			
Does the measure of BMP effectiveness require Program Plan modificat	ion?	Yes V No	

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

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

Illicit Discharge Reports <sup>1</sup>			
Number of instances: Number of instances closed:		Percent of instances closed:	
0	N/A	N/A	
Were 100% of instances of illicit	N/A		
Public Input on Program Plan <sup>2</sup>			
Number of instances:	Number of responses:	Percent of instances responded to:	
0	N/A	N/A	
Was a response provided to all instance of public input?		N/A	

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

<sup>&</sup>lt;sup>1</sup> Illicit discharge reports are provided in Appendix A, if > zero instances.

<sup>&</sup>lt;sup>2</sup> Public input and response documentation is in Appendix B, if > zero instances.

## BMP 2C - Public Involvement/Participation Activities

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

Public Involvement/Participation Activities			
Involvement Type <sup>1</sup>	Description of activity	Report on the Metric to measure benefit to water quality	Beneficial to Improving water quality?
Educational Events	Distribution of brochures around campus.	Distributed 1,300 to all mail rooms and open spaces (13 buildings).	✓ Yes No
Disposal or collection events	Recycling (paper) partnership with the City of Danville.	26 bins (at 13 buildings) collected weekly by, and in partnership with, the City of Danville	✓ Yes No
Pollution prevention	Grounds staff performed recycling and trash pickup around campus.	Total 6.5 bags collected by maintenance team and college clubs.	✓ Yes No
Disposal or collection events	In April 2023, campus recycling and trash pick-up event.	(6) 5-gallon bags filled, equivalent to potential removal from MS4	▼ Yes □ No

<sup>&</sup>lt;sup>1</sup> A minimum of two involvement types must be used annually.

Summary of BMP Effectiveness based on Program Plan Measurable Goal		
Does the measure of BMP effectiveness require Program Plan modification?	▼ Yes □ No	
If yes, please described necessary BMP modifications to improve effectiveness:		
Meetings have begun with the Emergency Management Team VP Dr Cornelius Johnson and several		
Deans, and Leadership Team which consists of Faculty, to engage trash pick-up, volunteerism and		
more inclusive campus engagement to be ongoing. This BMP will be revamped in accordance with		
the new general permit to better engage the DCC public.		

## 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 30<sup>th</sup> of the reporting year;

Certification Statement: MS4 Map & Information Table Updates	
"In accordance with the General Permit and the DCC Program Plan, DCC 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."	✓ 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 3B - Prohibition of Unauthorized Non-stormwater 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 DCC public;
- ✓ An assessment, when applicable, of any disciplinary action in context to the protection of water quality.

Illicit Discharge Prohibition Enforcement		
No. Add Instance	Disciplinary action taken? (Yes / No)	Description of action taken
Total number of instances for cur	rrent reporting year.	0
Total number of instances for las	t reporting year.	0
Total number of instances two ye	ears previous.	0
Total number of instances three y	ear prior.	0
Do trends indicate the BMP is in	effective?	☐ Yes ▼ No

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	Yes V 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 DCC 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 DCC 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.	18
Total number of DCC outfalls.	18
Were 100% of outfalls screened during the reporting year?	✓ Yes No

#### **Effectiveness Assessment for Addressing Illicit Discharges**

Were all instances of identified illicit discharge closed?

Ongoing. Annual screening identified one obvious illicit discharge (sediment) at OF-9. The issue is minimal erosion around the outlet pipe that discharges from a bioretention facility. During the reporting period, H2R Engineering, under contract with DCC, identified corrective actions to address the erosion concern. DCC will be procuring a contractor to make the required corrective actions during the reporting period. See also reporting for BMP 5B (Bioretention BMP maintenance – SWM Facility BMP #2).

#### 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

- ✓ 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.
- ✓ 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 DCC Program Plan, DCC 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."	✓ Yes  No
ESC Inspections & Enforcement Summary	

ESC Inspections & Enforcement Summary		
Total number of ESC inspections conducted: $\theta$ – no land disturbance activities during reporting year		
Were any enforcement actions taken during the reporting year?	N/A	
Summary of BMP Effectiveness based on Program Plan Measurable Goal		
Does the measure of BMP effectiveness require Program Plan modi	fication?	

#### BMP 4B -Controls to Prevent Non-stormwater Discharges during Land Disturbance

- ✓ The total number of illicit discharges originating from land disturbance activity of the total illicit discharge reports (Illicit Discharge Investigation forms in Appendix A, if > zero); 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 V No

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	☐ Yes <b>☑</b> 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 DCC 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 DCC Program Plan, DCC 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."	☐ Yes ☐ No ☑ N/A

Certification Statement: Adherence to the VCCS Standards & Specifications for SWM	
(Not Applicable for Reporting Year)	
Confirmation Statement: "DCC confirms that land disturbing projects did not occur during the reporting period that would be applicable to the latest DEQ-approved standards and specifications for Stormwater Management."	Marked box below is confirmation ⊠

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

## 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 DCC'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. 4	
Was at least one inspection performed on each DCC SWM facility?	✓ Yes No
Were any <u>significant</u> maintenance, repair, or retrofit activities identified as necessary as a result of inspection this reporting period?	▼ 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: Repairs needed to BMP anti-clogging device.	
• BMP #2: Address concerns regarding erosion at/around outlet pipe. DCC contracted H2R	
Engineering during the reporting period to investigate and identify corrective actions to	
address the erosion concern. Corrective actions were identified by H2R and DCC will	
contract the work during the current reporting period.	
All other maintenance items identified during inspections were not critical to BMP	
considered general routine maintenance. The inspection reports are available upor	n request.

#### BMP 5C - Maintain SWM Facilities Spreadsheet

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

#### BMP 5D -SWM Facilities Reporting to DEQ

- ✓ A confirmation statement that either: (1) DCC 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) DCC 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 DCC 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: "DCC 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

<sup>&</sup>lt;sup>1</sup> 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)	
Certification Statement: Reporting to the DEQ BMP Warehouse	

Certification Statement: Reporting to the DEQ BMP Warehouse		
Confirmation Statement: "DCC 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 ✓ N/A	
Certification Statement: Report to Virginia Construction Stormwater General Permit Database (Not Applicable for Reporting Year)		
Confirmation Statement: "DCC did not install SWM facilities and BMPs 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"	Marked box below is confirmation ⊠	

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

## 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 DCC MS4 Program Plan for specific BMP information.

#### BMP 6A -Written Procedures for Pollution Prevention/Good Housekeeping

- ✓ 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 *DCC 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?	Yes No
Summary of Modifications to Operation Procedures	
Were modifications made to the DCC Staff Handbook of Good Housekeeping and Pollution Prevention during the reporting year?	Yes V 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?	▼ Yes □ No
If yes, is a SWPPP required?	☐ 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 6C - Maintain/Implement Nutrient Management Plans and Deicing Policy

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

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

Nutrient Management	
Did DCC apply nutrients during the reporting year?	☐ 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 6D - Contractor Requirements to Utilize Controls to Minimize Pollutant Discharges

Annual reporting for this BMP requires:

- ✓ The number of illicit discharges originating from contractor activities.
- ✓ Summary of assessment to modify procurement procedures to prevent future instances.

BMP 6A Annual Reporting Form	
Were there any illicit discharges during the reporting period that originated from contractor activities?	Yes V No
Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	Yes V No

## BMP 6E - Training Plan for Applicable Employees

- ✓ The date of the most recent training event;
- ✓ The date of the prior training event (to ensure within 24 months);
- ✓ The number of employees who attended the most recent training event;
- ✓ 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:	<u>September 20,</u> 2023
Date of previous training:	<u>April 23, 2021</u>
Has training continued to be provided a biennially?	▼ Yes No
Number of employees that attended the latest training event.	10
Number of employees identified to be required to participate in training (as defined by the general permit and program plan).	10
Percent of those identified that attended training.	100%
Did a significant percentage of those required attend?	▼ Yes No
Provide a description of the objective of the 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.	82%
Note: Quiz results have demonstrated knowledge of the topics covered, with average quiz scores following training of 79% (2019), 96% (2021) and 82% (2023).	

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	☐ Yes <b>☑</b> No