Christiansburg, Virginia

Municipal Separate Storm Sewer System Program Plan

For

General Permit No. VAR040025

2023-2028

From November 1, 2023, until October 31, 2028, in accordance with the VAR04 General Permit the Town of Christiansburg is authorized to discharge stormwater and authorized non-stormwater discharges described in 9VAC25-890-20 D from the small municipal separate storm sewer system into surface waters within the boundaries of the Commonwealth of Virginia consistent with 9VAC25-890-40.

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ACRONYMS

BMP	Best Management Practice
DCR	Virginia Department of Conservation and Recreation
DEQ	Virginia Department of Environmental Quality
CUA	Census Urbanized Area/Census Urban Area
ESC	Erosion and Sediment Control
HUC	Hydrologic Unit Code
MEP	Maximum Extent Practicable
MCM	Minimum Control Measure
MS4	Municipal Separate Storm Sewer System
NMP	Nutrient Management Plan
POC	Pollutants of Concern
PCB	Polychlorinated biphenyl
SLAF	Stormwater Local Assistance Fund
SWM	Stormwater Management
SWPPP	Stormwater Pollution Prevention Plan
TMDL	Total Maximum Daily Load
VPDES	VAR04 General Virginia Pollutant Discharge Elimination System Permit for Discharges of Stormwater from Small Municipal Separate Storm Sewer Systems
VCACS	Virginia Department of Agriculture and Consumer Services
VESCP	Virginia Erosion and Sediment Control Program
VSMA	Virginia Stormwater Management Act
VSMP	Virginia Stormwater Management Program
WLA	Waste Load Allocation

DEFINITIONS

"Annual practice" means a nonstructural best management practice such as street or storm drain cleaning that reduces pollution for one compliance year upon implementation.

"Best management practice" means schedules of activities, prohibitions of practices, including both structural and nonstructural practices, maintenance procedures, and other management practices to prevent or reduce the pollution of surface waters and groundwater systems from the impacts of land-disturbing activities.

"Construction activity" means any clearing, grading or excavation associated with large construction activity or associated with small construction activity.

"Date brought online" means the date when the Town determines that a new stormwater management facility is properly functioning and regulated under the MS4 permit.

"Discharge," when used without qualification, means the discharge of a pollutant.

"Drainage area" means a land area, water area, or both from which runoff flows to a common point.

“Ecosystem restoration projects" means practices implemented to reestablish and maintain natural systems that prevent, reduce, or remediate pollutant loadings. Examples of ecosystem restoration projects include stream restoration, shoreline restoration, land-use conversion, and reforestation.

"High-priority facilities" means facilities owned or operated by the Town with drainage to any permitted MS4 that actively engage in one or more of the following activities: (i) composting; (ii) equipment storage, cleaning, and maintenance; (iii) long-term bulk materials storage; (iv) pesticide, herbicide, and fertilizer storage; (v) recycling; (vi) anti-icing and deicing agent storage, handling, and transfer; (vii) solid waste handling and transfer, and (viii) permittee owned or operated vehicle washing, maintenance, and salvage."

“Hydrologic Unit Code" means a watershed unit established in the most recent version of Virginia's 6th Order National Watershed Boundary Dataset.

"Illicit discharge" means any discharge to a municipal separate storm sewer that is not composed entirely of stormwater, except discharges resulting from firefighting activities (Discharges or flows from emergency fire-fighting activities need only be addressed where they are identified as significant sources of pollutants to surface waters.), water line flushing (managed in a manner to avoid an instream impact), landscape irrigation, diverted stream flows, rising groundwaters, uncontaminated groundwater infiltration, uncontaminated pumped groundwater, discharges from potable water sources)(managed in a manner to avoid instream impact), foundation drains, air conditioning condensation, irrigation water, springs, water from crawl space pumps, footing drains, lawn watering, individual residential car washing, flows from riparian habitats and wetlands, dechlorinated swimming pool discharges (managed in a manner to avoid instream impact), street and pavement wash waters that do not contain cleaning additives or are otherwise managed to avoid instream impact, noncommercial fundraising car washes if the washing uses only biodegradable, phosphate-free, water-based cleaners; or other activities generating discharges identified by the department as not requiring VPDES authorization.

"Impervious cover" means a surface composed of material that significantly impedes or prevents natural infiltration of water into soil.

"Land disturbance" or "land-disturbing activity" means a manmade change to the land surface that potentially changes its runoff characteristics and may result in soil erosion, including clearing, grading, excavating, or filling, or excavation. Chapter 16 of the Code of the Town of Christiansburg contains the detailed definition referenced in this program plan.

"Municipal separate storm sewer system" means a conveyance or system of conveyances including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains.

“MS4 Program Plan” means the completed registration statement and all approved additions, changes and modifications detailing the comprehensive program implemented by the operator under this state permit to reduce the pollutants in the stormwater discharged from its municipal separate storm sewer system (MS4) that has been submitted and accepted by DEQ.

"MS4 regulated service area" or "service area" means for Phase II permittees, the drainage area served by the permittee's MS4 that is located within the 2020 census urban areas with a population of at least 50,000 or the 2000 and 2010 decennial censuses urbanized area as determined by the Bureau of the Census. MS4 regulated service area may also be referred to as "served by the MS4" as it pertains to the tables in Part II.A of this permit.

"Outfall" means, when used in reference to municipal separate storm sewers, a point source at the point where a MS4 discharges to surface waters and does not include open conveyances connecting two municipal separate storm sewers, or pipes, tunnels or other conveyances which connect segments of the same stream or other surface waters and are used to convey surface waters.

"Physically interconnected" means that one MS4 is connected to a second MS4 in such a manner that it allows for direct discharges to the second system.

"Pollutants of concern" means pollutants specifically identified in a U.S. Environmental Protection Agency approved total maximum daily load report as causing a water quality impairment.

“Public” means, for the purpose of this Program Plan, the citizens of the Town or the population who is employed by the Town.

"Point of discharge" means a location at which concentrated stormwater runoff is released.

"State waters" means all water, on the surface and under the ground, wholly or partially within or bordering the Commonwealth or within its jurisdiction, including wetlands.

"Stormwater" means precipitation that is discharged across the land surface or through conveyances to one or more waterways and that may include stormwater runoff, snow melt runoff, and surface runoff and drainage.

"Stormwater management plan" means a document(s) containing material for describing methods for complying with the requirements of the Virginia Stormwater Management Program.

"Traditional MS4 permittee" or "traditional permittee" means a local government that operates a regulated MS4 under the authority of a county board of supervisors, a city council, or a town council.

"Total maximum daily load" means the sum of the individual wasteload allocations for point sources, load allocations for nonpoint sources, natural background loading and a margin of safety. TMDLs can be expressed in terms of either mass per time, toxicity, or other appropriate measure. The TMDL process provides for point versus nonpoint source trade-offs.

"Transitional sources" means regulated land disturbing activities that are temporary in nature and discharge through the MS4.

"Wasteload allocation" or "wasteload" means the portion of receiving surface water's loading or assimilative capacity allocated to one of its existing or future point sources of pollution. WLAs are a type of water quality-based effluent limitation.

"Watershed" means a defined land area drained by a river or stream, karst system, or system of connecting rivers or streams such that all surface water within the area flows through a single outlet.

1.0 MS4 PROGRAM PLAN

The Program Plan when implemented by the Town of Christiansburg (Town) constitutes compliance with the standard of reducing pollutants to the maximum extent practicable (MEP) of the VAR04 General Virginia Pollutant Discharge Elimination System (VPDES) Permit for Discharges of Stormwater from Small Municipal Separate Storm Sewer Systems (MS4s), referred to in the remainder of this Plan as the General Permit.

1.1 Minimum Control Measures

The General Permit requires the Program Plan to include Best Management Practices (BMP) to address the requirements of six minimum control measures (MCMs) described in Part I.E of the General Permit. The MCMs are summarized as:

- MCM 1: Public Education and Outreach on Stormwater Impacts
- MCM 2: Public Involvement and Participation
- MCM 3: Illicit Discharge Detection and Elimination
- MCM 4: Construction Site Stormwater Runoff and Erosion and Sediment Control
- MCM 5: Post-construction Stormwater Management
- MCM 6: Pollution Prevention/Good Housekeeping for Operations

Section 3.0 of this Program Plan includes BMPs developed to explicitly address the General Permit requirements for each MCM. The title of each BMP is followed with a reference to the corresponding permit section. Each BMP included in the Program Plan is intended to specifically address permit requirements and includes the following information described in Part I.C of the General Permit:

- The roles and responsibilities of each of the Town's divisions and departments in the implementation of the requirements of the permit tasked with ensuring that the permit requirements are met (Part I.C.1.a);
- If the Town utilizes another entity to implement portions of the MS4 Program, a copy of the written agreement. The description of each party's roles and responsibilities, including any written agreements with third parties, shall be updated as necessary (Part I.C.1.b);
- For each MCM in Part I.E, the following information shall be included (Part I.C.1.c):
    - Each specific requirement as listed in Part I.E for each MCM (Part I.C.1.c.(1));
    - A description of the BMPs or strategies that the Town anticipates will be implemented to demonstrate compliance with the permit conditions in Part I.E (Part I.C.1.c.(2));
    - All standard operating procedures or policies necessary to implement the BMPs (Part I.C.1.c.(3));
    - The measurable goal by which each BMP or strategy will be evaluated (Part I.C.1.c.(4)); and
    - The persons, positions, or departments responsible for implementing each BMP or strategy (Part I.C.1.c.(5)); and
- A list of documents incorporated by reference including the version and date of the document being incorporated (Part I.C.1.d).

1.2 Special Conditions for TMDLs (Part II A, B & C)
The Town is not located within the Chesapeake Bay Watershed and therefore is not subject to the Special Conditions for the Chesapeake Bay TMDL.

The Town is currently subject to several Local TMDLs which include the Roanoke (Staunton) River Watershed PCB TMDL, the Wilson Creek (Upper Roanoke River) Watershed E. Coli TMDL, the Upper Roanoke River Watershed Sediment TMDL, the New River PCB TMDL, the Crab Creek Watershed E. Coli and Sediment TMDL. Where the Town is assigned a WLA for a Local TMDL, an action plan will be developed and included by reference in this Program Plan and future updates.

The Town is subject to the Special Conditions of the Roanoke (Staunton) River Watershed PCB TMDL, the Wilson Creek Upper Roanoke River Watershed E. Coli TMDL, the Upper Roanoke River Watershed Sediment TMDL, and the Crab Creek Watershed E. Coli and Sediment TMDL. Continued implementation of the Action Plan will be performed.

The New River PCB TMDL was approved by EPA on 3/12/2019. The Town will develop a TMDL action plan by May 1, 2026.

1.3 Roles and Responsibilities (Part I.C.1.a & b)
Each BMP lists the individual(s) responsible for implementation. At the Town, the Engineering Department implements the MS4 Program Plan and the Town Manager is the signature authority in accordance with Part III K. The Town is the VESCP and VSMP plan approving authority.

1.4 Program Modifications (Part I.C.3 & 4)
The Town shall update the MS4 program plan to meet the requirements of this permit no later than six months after the effective date of this permit unless otherwise specified in another permit condition (Part I.C.3) and shall post the most up-to-date version of MS4 program plan on the Town's website or location where the MS4 program plan can be obtained as required by Part I.E.2 within 30 days of updating the MS4 program plan (Part I.C.4). Revisions to the MS4 program plan are expected throughout the life of this permit as part of the iterative process to reduce pollutant loading and protect water quality to the MEP. As such, revisions made in accordance with this permit as a result of the iterative process do not require modification of this permit. The Town shall summarize revisions to the MS4 program plan as part of the annual report as described in Part I.D.3 (Part I.C.5).

1.5 List of Reference Materials (Part I.C.1.d)
The list of documentation below is incorporated into the Program Plan via reference along with any associated maps and forms, where applicable. All necessary documents for implementation not listed here, not provided in the MS4 Program Plan, and may or may not be provided in the annual reports are retained on file for a minimum of 3 years and are available upon request.

- MS4 Permit and Coverage Letter, October 2023
- Illicit Discharge Detection and Elimination Manual, September 2015
- Illicit Discharge Detection and Elimination Field Guide, September 2015
- Illicit Discharge Detection and Elimination Manual Outfall Inspection
- Good Housekeeping and Pollution Prevention Manual, November 2018
- Public Education and Outreach Plan, Revised November 2018

- Construction Standard Operating Procedures, March 2019
- Post-Construction Standard Operating Procedures, April 2019
- Nutrient Management Plans, September 2023
- PCB TMDL Action Plan (for Roanoke River watershed), July 2025
- Sediment TMDL Action Plan (for Roanoke River & Crab Creek watershed), July 2025
- Bacteria TMDL Action Plan (for Wilson Creek and Crab Creek watershed) July 2025
- Outfall Information Table updated yearly
- SWM Facility Tracking Database continually updated

1.6 Annual Reporting (Part I.D)

This Program Plan includes requirements to satisfy annual reporting of the General Permit:

- The Town shall submit an annual report to the department no later than October 1 of each year in a method, and format) as specified by the department; the required content of the annual report is specified in Part I.E and Part II.B. The report shall cover the previous year from July 1 to June 30 (Part I.D.1). Following notification from the department of the start date for the required electronic submission of annual reports, as provided for in 9VAC25-31-1020, such forms and reports submitted after that date shall be electronically submitted to the department in compliance with this section and 9VAC25-31-1020. There shall be at least a three-month notice provided between the notification from the department and the date after which such forms and reports must be submitted electronically (Part I.D.2).
- The annual report shall include the following general information (Part I.D.3):
    - The Town, system name, and permit number (Part I.D.3.a);
    - The reporting period for which the annual report is being submitted (Part I.D.3.b);
    - A signed certification as per Part IV.K (Part I.D.3.c);
    - Each annual reporting item as specified in an MCM in Part I.E (Part I.D.3.d); and
    - 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 (Part I.D.3.e).
- When applicable, the Town 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 (Part I.D.5).

For the purposes of this permit, the MS4 program plan and annual reports shall be maintained as separate documents and submitted to the department as required by this permit as two separate documents (Part I.D.6).

2.0 SCHEDULE

Some of the BMPs require Program documents or actions to address permit requirements. Table 1 lists some of these documents and actions with dates critical for assuring compliance with the General Permit. Table 1 is intended to assist with Program Plan implementation.

Table 1: Schedule for Program Implementation.		
Annual Schedule		
BMP / Regulation	**Necessary Action**	**Timeline**
6.5 / Part I.E.6.k	Review and Update SWPPP After an Unauthorized Discharge, Release or Spill Reported, if Applicable	30 Days (Review), and 90 Days (Update**)**
6.6 / Part I.E.6.s	Implement a Nutrient Management Plan, if necessary, After Final Stabilization of a Land Disturbance Project	6 Months After Final Stabilization
6.6 / Part I.E.6.u	Nutrient Management Plans Submitted to DCR	30 Days Prior to Expiration
SC3.1 / Part II.B.7	Notify DEQ in Writing of a Previously Unidentified Significant Source of PCBs within the MS4 Area	30 Days of Discovery
2.2 / Part I.E.2.d	Implement Four Public Involvement and Participation Activities	June 30
6.5 / Part I.E.6.k	Annually Review High-Priority Facilities without SWPPPs and Develop SWPPP if Required, Maintain a List of High-Priority Facilities	June 30 (Review) and December 31 (Develop)
3.1 / Part I.E.3.a.(5)	Update MS4 Map, Information Table, and Check for Any Approved TMDLs	October 1
3.4 / Part III.B, D, & E	Report BMPs Implemented and Inspected Using DEQ BMP Warehouse	October 1
1.6 & CB-SC.2 / Part I.D	Submit Annual Report	October 1
2.1 / Part I.E.2.b.(3)	Post Annual Report on the Stormwater Webpage	November 1 (30 Days After October 1)

Permit Cycle Schedule		
BMP/Regulation	**Necessary Action**	**Timeline**
9VAC25-890-30	Submit Registration Statement	Completed (October 1, 2023)
2.1 / Part I.E.2.b	Update and Maintain a Stormwater Webpage	Completed February 1, 2024 (3 months)
6.6 / Part I.E.6.u	Nutrient Management Plans approved by DCR on 9/26/2023	September 1, 2026
1.4 / Part 1.C.3	Update the MS4 Program Plan	May 1, 2024 (6 months)
1.4 & 2.1 / Part 1.C.3	Post an Updated MS4 Program Plan on Storwmater Webpage	June 1, 2024 (30 days after 6 months)
6.5 / Part I.E.6.g	Identify Any New High-Priority Facilities within Expanded 2020 CUA	November 1, 2024 (12 months)
6.6 / Part I.E.6.q	Identify Areas within Expanded 2020 CUA Requiring Nutrient Management Plans	November 1, 2024 (12 months)
6.4 / Part I.E.6.d	Conduct GHPP/IDDE Training	June 30, 2024 (Once per 24 months)
SC1.1, SC1.2 & SC2.1 & SC2.2 / Part II.B.2.a	Update Local TMDL Action Plans as Applicable / Public Comment Period Prior to Submittal to DEQ	May 1, 2025 / 15 days (18 months)
3.1 / Part I.E.3.a.(1)	Update MS4 Map	November 1, 2025 (24 months)
3.1 / Part I.E.3.a.(3)	Submit GIS Geodatabase or Shapefiles of Outfalls and MS4 Area with Attribute Tables	November 1, 2025 (24 months)
6.1 / Part I.E.6.b.(1)(a)	Update Anti-icing and Deicing GHPP Procedures	November 1, 2025 (24 months)

Permit Cycle Schedule		
BMP / Regulation	**Necessary Action**	**Timeline**
3.2 / Part II.B.2.b	Develop and Initiate Implementation of the TMDLs Approved by EPA on or after July 1, 2018 and Prior to October 31, 2023 in which a WLA has been Allocated / Public Comment Period Prior to Submittal to DEQ	May 1, 2026 (30 months)
SC2.1 / Part II.B.6.d	Submit to DEQ an Update on the Progress Made Toward Achieving Local Sediment, Phosphorus and Nitrogen TMDL Action Plan Goals and Anticipated End Dates	November 1, 2026 (36 months)
6.6 / Part I.E.6.r	Develop and Implement Nutrient Management Plans on Areas within the Expanded 2020 CUA.	November 1, 2026 (36 months)
6.6 / Part I.E.6.u	No Nutrient Management Plans Expired	November 1, 2026 (36 months)
6.1 / Part I.E.6.b.(2)	Update Renovation and Significant Exterior Maintenance GHPP Procedures	November 1, 2026 (36 months)
6.5 / Part I.E.6.h	Develop and Implement New High Priority Facility SWPPP(s), if Applicable	November 1, 2026 (36 months)
3.3 / Part II.C.1	Develop and Maintain Written Inspection and Maintenance Procedures for Ecosystem Restoration Projects	November 1, 2026 (36 months)
6.4 / Part I.E.6.d	Conduct GHPP/IDDE Training	June 30, 2026 (Once per 24 months)
3.3 / Part II.C.2	Inspect Ecosystem Restoration Projects Implemented as Part of a Current TMDL Action Plan	November 1, 2028 (once every 60 months)

3.0 PROGRAM PLAN BEST MANAGEMENT PRACTICES

This Section includes the BMPs that the Town will implement to meet the requirements for each MCM and the applicable Special Conditions described in the General Permit.

BMP 1.1 Public Education and Outreach Program (Part I.E.1)

Description: The Town shall implement a public education and outreach program designed to (Part I.E.1.a):

- Increase the public's knowledge of how to reduce stormwater pollution, placing priority on reducing impacts to impaired waters and other local water pollution concerns;
- Increase the public's knowledge of hazards associated with illegal discharges and improper disposal of waste, including pertinent legal implications; and
- Implement a diverse program with strategies that are targeted toward individuals or groups most likely to have significant stormwater impacts.

The Town shall identify no fewer than three high-priority stormwater issues to meet the goal of educating the public in accordance with Part I.E.1.a. High-priority issues may include the following examples: TMDL pollutants of concern, pet wastes, local receiving water impairments, high-quality receiving waters, litter control, BMP maintenance, anti-icing and deicing agent application, planned green infrastructure redevelopment, planned ecosystem restoration projects, and illicit discharges from commercial sites (Part I.E.1.b). The high-priority public education and outreach program, as a whole, shall (Part I.E.1.c):

- Clearly identify the high-priority stormwater issues (Part I.E.1.c.(1));
- Explain the importance of the high-priority stormwater issues (c Part I.E.1.c.(2));
- Include measures or actions the public can take to minimize the impact of the high-priority stormwater issues (Part I.E.1.c.(3)); and
- Provide a contact and telephone number, website, or location where the public can find out more information (Part I.E.1.c.(4)).

The Town shall use two or more of the strategies listed in Table 2 per year to communicate to the target audience the identified high-priority stormwater issues including how to reduce stormwater pollution (Part I.E.1.d).

The Town may coordinate its public education and outreach efforts with other MS4 permittees; however, each permittee shall be individually responsible for meeting all of its state permit requirements (Part I.E.1.e).

The Town may identify staff and students as part of the target audience for education and outreach strategies; however, staff shall not be the majority of the target audience (Part I.E.1.f.(5)). Staff training required for Good Housekeeping and Pollution Prevention does not qualify as a strategy for public education and outreach (Part I.E.1.f.(6)).

Table 2: Strategies for Public Education and Outreach	
Strategies	**Examples** (not meant to be all inclusive or limiting)
Traditional written materials	Informational brochures, newsletters, fact sheets, utility bill inserts, or recreational guides for targeted groups of citizens
Alternative materials	Bumper stickers, refrigerator magnets, t-shirts, or drink koozies
Signage	Temporary or permanent signage in public places or facilities, vehicle signage, billboards, or storm drain stenciling
Media materials	Information disseminated through electronic media, radio, televisions, movie theater, newspaper, or GIS story maps
Speaking engagements	Presentations to school, church, industry, trade, special interest, or community groups
Curriculum materials	Materials developed for school-aged children, students at local colleges or universities, or extension classes offered to local citizens
Training materials	Materials developed to disseminate during workshops offered to local citizens, trade organization, or industrial officials
Public education activities	Booth at community fair, demonstration of stormwater control projects, presentation of stormwater materials to schools to meet applicable education Standards of Learning or curriculum requirements, or watershed walks
Public meetings	Public meetings on proposed community stormwater management retrofits, green infrastructure redevelopment, ecosystem restoration projects, TMDL development, [climate change's effects on stormwater management, voluntary residential low impact development, or other stormwater issues

A summary of the Town's typical Public Education and Outreach Activities. Table 3 is meant to show the variety of activities that the Town may choose from to meet the requirements of MCM 1. The Town reserves the right to add or substitute activities as needed. Additionally, with the overlap between MCM 1 and MCM 2 acceptable activities, the Town may move activities between MCM 1 and 2 to meet permit requirements.

Table 3: Anticipated Public Education & Outreach Activities				
#	**High Priority Stormwater Issue**	**Strategy**	**Communication**	**Anticipated Time Period**
1	Education on special water quality concerns (PCBs)	Media and Traditional Written Materials	Articles in The Christiansburg Connection newsletter and/or posted on the Town's website or Facebook page	July 1 – June 30
2	Education on special water quality concerns (E. Coli)	Media and Traditional Written Materials	Articles in The Christiansburg Connection newsletter and/or posted on the Town's website or Facebook page	July 1 – June 30

3	Education on Stream Health (Stream restorations, lawn care/sediment)	Media and Traditional Written Materials	Articles in The Christiansburg Connection newsletter and/or posted on the Town's website or Facebook page	July 1 – June 30

Below is a list of high-priority stormwater issues the Town will communicate to the public as part of the public education and outreach program (Part I.E.1.f.(1)).

High Priority Stormwater Issue No. 1: Public education on special water quality concerns (PCBs)

Rationale (Part I.E.1.f.(2)): The Town has been assigned wasteload allocations for PCBs as part of several TMDLs. The public survey did not include questions about PCBs, so no conclusion about knowledge can be reached. Since there are several receiving waterbodies with PCB wasteload allocations, PCB education will continue to be addressed.

Public Audience (Part I.E.1.f.(3)): The Town conducts a Spring and a Fall clean up when all residents may put out extra items for special trash pick-up. Some of these items may contain PCBs. Since all residents may participate, the target audience will include all households. The Town's public audience is approximately 9,800 households.

Strategy to Communicate High Priority Stormwater Message (Part I.E.1.f.(7)): Media materials and traditional written materials will be used to disseminate information for this BMP. The topic will be addressed with articles in The Christiansburg Connection newsletter and/or posted on the Town's Facebook page and Town website. The Christiansburg Connection is included as an insert in all mailed utility bills six times per year. It is also available as an electronic subscription and is promoted on the Town's website and Facebook page. Facebook will be preferred as an electronic media as documentation indicates it reaches more people. The Town also can "push" Facebook posts which puts the post in front of more users. However, it cannot be determined if those people are residents of the Town. The Town will also use the outreach to the Montgomery County School System as an education and outreach strategy across all three of the identified water quality issues.

Relevant Message (Part I.E.1.f.(7)): To address goals of the Program and concerns stemming from the survey results, the relevant message will include:

- Information regarding the Town's stormwater program
- Steps that can be taken to reduce stormwater pollution
- Knowledge of hazards associated with illegal discharges and improper disposal of waste
- Information regarding TMDL pollutants of concern, specifically polychlorinated biphenyls (PCBs). Inform the Town residents of possible household sources of PCBs and inform residents how to properly dispose of waste that may contain PCBs.

Time Period (Part I.E.1.f.(8)): The newsletter article or media post will be distributed a minimum of once a year to at least 20% of the public audience during the permit year.

Measurable Goal (Part I.E.1.i.(7)): Provide PCB concerns message to the target audience via Christiansburg Connection newsletter, Facebook posts and/or the Town website posts once per permit year to the public audience.

High Priority Stormwater Issue No. 2: Education on special water quality concerns (E. Coli)

Rationale (Part I.E.1.f.(2)): The Town has been assigned wasteload allocations for bacteria as part of several approved TMDLs. Survey results indicate little to no increase in the knowledge about pet waste so continued outreach efforts are needed.

Public Audience (Part I.E.1.f.(3)): The Town estimates approximately 4900 households to have pets based on the estimate of 50% of households owning at least one pet according to the 2020 United States Census. However, since the specific pet-owning households are unknown, the target audience will include all households. There are approximately 9,800 households in the Town.

Strategy to Communicate High Priority Stormwater Message (Part I.E.1.f.(7)): Media and traditional written materials will be used to disseminate information for this BMP. The topic will be addressed with articles in The Christiansburg Connection newsletter and/or posted on the Town's website or Facebook page. The Christiansburg Connection is included as an insert in all mailed utility bills six times per year. It is also available as an electronic subscription and is promoted on the Town's website and Facebook page. Facebook will be preferred as an electronic media as documentation indicates it reaches more people. The Town also can "push" Facebook posts which puts the post in front of more users. However, it cannot be determined if those people are residents of the Town. The Town will also use the outreach to the Montgomery County School System as an education and outreach strategy across all three of the identified water quality issues. Additionally, pet waste bags have been purchased to distribute at Public Participation events as a take home message on the importance of cleaning up after pets.

Relevant Message (Part I.E.1.f.(7)): To address goals of the Program and concerns stemming from the survey results, the relevant message will include:

- General information about stormwater runoff (where it drains, pollutants, etc.)
- Explanation of the E. Coli TMDLs and the Town's Action Plans
- The effects of pet waste on E. Coli concentrations in the water quality of local waterways.
- The role pet owners play when they pick up and properly dispose of pet waste.
- Include information on location of pet waste stations.

Time Period (Part I.E.1.f.(8)): Outreach material for each special water quality concern will be distributed a minimum of once a year to part of each target audience. The topic addressed will be staggered with Water Quality Issues #2 and #3 to ensure outreach to the entirety of the target audience. Pet waste bags will be distributed during at least one spring Public Participation events.

Measurable Goal (Part I.E.1.i.(7)): Provide E. coli concerns message to the target audience via Christiansburg Connection newsletter, Facebook posts and/or the Town website posts once each permit year. Distribute pet waste bags.

High Priority Stormwater Issue No. 3: Education on Stream Health (Sediment and erosion reductions)

Rationale (Part I.E.1.f.(2)): The Town has invested in stream restorations to improve stream health. The reissued Stormwater Survey showed a high interest in the improvement of water quality. The Town has also been assigned wasteload allocations for sediment as part of several approved TMDLs. Poor vegetative cover is a potential contributor of pollutants causing the benthic and bacterial impairments in the Crab Creek and Roanoke River basins. The re-issued Stormwater Survey indicated that residents did not view sediment as a top water pollutant. Therefore, the role of poor vegetative cover on residential sites as a source of sediment pollution will continue to be addressed.

Public Audience (Part I.E.1.f.(3)): The target audience includes all residents within the Town along with homeowner associations and property management companies which includes 9,800 households.

Strategy to Communicate High Priority Stormwater Message (Part I.E.1.f.(7)): Media and traditional written materials will be used to disseminate information for this BMP. Both topics will be addressed with separate articles in The Christiansburg Connection newsletter and/or posted on the Town's website or Facebook page. The Christiansburg Connection is included as an insert in all mailed utility bills six times per year. It is also available as an electronic subscription and is promoted on the Town's website and Facebook page. Facebook will be preferred as an electronic media as documentation indicates it reaches more people. However, it cannot be determined if those people are residents of the Town. The Town will also use the outreach to the Montgomery County School System as an education and outreach strategy across all three of the identified water quality issues.

Relevant Message (Part I.E.1.f.(7)): Inform households, homeowner associations, and property management companies of the expected improvements in stream health from the stream restoration projects. Communicate the positive environmental effects of good vegetative cover, as well as cost savings of stream friendly lawn care.

Time Period (Part I.E.1.f.(8)): Outreach material for each topic will be distributed a minimum of once a year to the target audience. The topics addressed will be staggered with Water Quality Issue # 1 and #2 to ensure outreach to the entirety of the target audience.

Measurable Goal (Part I.E.1.i.(7)): Provide stream restoration and/or sediment reducing property maintenance message to the public audience once per permit year.

Necessary documentation for implementation: (1) Copies of distributed media messages posted, emailed, or sent for Water Quality Issue No. 1, 2, and 3 including content, date, and print circulation or social media metrics.

Responsible individual for implementation: Engineering and Public Relations Departments

Measurable goal: Effectiveness of the BMP will be determined by the completion and necessary documentation of the selected strategies to convey the three water quality issues.

BMP 2.1 Webpage Dedicated to MS4 Program & Stormwater Pollution Prevention (Part I.E.2)

Description: The Town shall develop and implement procedures for the following (Part I.E.2.a):

- The public to report potential illicit discharges, improper disposal, or spills to the MS4, complaints regarding land disturbing activities, or other potential stormwater pollution concerns (Part I.E.2.a.(1));
- The public to provide comments on the Town's MS4 Program plan (Part I.E.2.a.(2));
- Responding to public comments received on the MS4 Program plan or complaints (Part I.E.2.a.(3)); and
- Maintaining documentation of public comments received on the MS4 Program and associated MS4 Program plan and the Town's response (Part I.E.2.a.(4)).

Procedures for Public Comments or Complaints concerning the MS4 Program Plan

When public comment or complaints are received concerning the MS4 Program plan via either email or telephone, the Engineering Department, the Town Manager, and/or the Public Relations Department will respond to the comment or complaint from the public within a reasonable amount of time. The public input or complaint and the response will be maintained electronically along with other MS4 related documentation to be reported in the annual report.

No later than three months (February 1, 2024), the Town shall update and maintain the webpage dedicated to the MS4 Program and stormwater pollution prevention (Part I.E.2.b). The following will be maintained on the Town's Stormwater webpage:

- The effective MS4 permit and coverage letter (Part I.E.2.b.(1));
- The most current MS4 Program plan or location where the MS4 Program plan can be obtained (Part I.E.2.b.(2));
- The annual report for each year of the term covered by this permit no later than 30 days after submittal to the department (Part I.E.2.b.(3));
- The most current Chesapeake Bay TMDL action plan or location where the Chesapeake Bay TMDL action plan can be obtained (Part I.E.2.b.(4));
- A mechanism for the public to report potential illicit discharges, improper disposal, or spills to the MS4, complaints regarding land disturbing activities, or other potential stormwater pollution concerns (Part I.E.2.b.(6));
- Methods for how the public can provide comments on The Town's MS4 Program plan in accordance with Part I.E.2.a.(2); and if applicable, the Chesapeake Bay TMDL action plan in accordance with Part II A 13 (Part I.E.2.b.(7)); and

Webpage address: https://www.christiansburg.org/250/Stormwater-Information-and-Education

Necessary documentation for implementation: (1) Public input received on the MS4 Program and associated the Town responses, if applicable; (2) Effective MS4 Permit and coverage letter; (3) Most Recent MS4 Program Plan; and (4) All MS4 Annual Reports within permit cycle.

Responsible individual for implementation: Engineering and Public Relations Departments

Implementation schedule: The Town shall continue to provide mechanisms on the webpage for public input and reporting illicit discharges or complaints. The current Program Plan will be posted on the webpage. Annual reports will be posted on the webpage within 30 days of submittal (November 1) to DEQ each year.

Measurable goal: Effectiveness will be determined by the webpage including: (1) effective MS4 permit and coverage letter;(2) latest MS4 Program Plan; (3) all annual reports developed within the permit cycle no later than 30 days after submittal to the department; (4) a mechanism for the public to report potential illicit discharges, improper disposal, or spills, complaints regarding land disturbing activities, or other potential pollution concerns; (5) methods for public input on the Town's MS4 Program Plan and other documents that require a public comment period; (6) responding to public input; and (7) maintaining public input received and Town responses

BMP 2.2 Public Involvement and Participation (Part I.E.2)

Description: The Town will implement no fewer than four activities per year for two or more of the categories listed in Table 4 to provide an opportunity for public involvement to improve water quality and support local restoration and clean-up projects (Part I.E.2.d).

- The Town may coordinate the public involvement opportunities listed in Table 4 with other MS4 permittees; however, each permittee shall be individually responsible for meeting all of the permit requirements (Part I.E.2.e).
- The Town may also include staff and other community members in public participation events; however, the activity cannot solely include or be limited to staff participants with stormwater, groundskeeping, and maintenance duties in order for an event to qualify as a public participation event (Part I.E.2.f).
- Staff training required in accordance with Part I.E.6.d does not qualify as a public participation event unless the training activity solicits participation from target audiences beyond staff or contractors with stormwater, groundskeeping, and maintenance duties (Part I.E.2.g).

Table 4: Public Involvement Opportunities	
Public Involvement Opportunity Categories	**Examples** (provided as example & are not meant to be all inclusive or limiting)
Monitoring	Establish or support citizen monitoring group
Restoration	Stream, watershed, shoreline, beach, or park clean-up day, adopt-a-waterway program, tree plantings, and riparian buffer plantings.
Public education activities	Booth at community fair, demonstration of stormwater control projects, climate change's effects on stormwater management, presentation of stormwater materials to schools to meet applicable education Standards of Learning or curriculum requirements, or watershed walks.
Public meetings	Public meetings on proposed community stormwater management retrofits, green infrastructure redevelopment, ecosystem restoration projects, TMDL development, voluntary residential low impact development, climate change's effects on stormwater management, or other stormwater issues
Disposal or collection events	Household hazardous chemicals collection, vehicle fluids collection
Pollution prevention	Adopt-a-storm drain program, implement a storm drain marking program, promote use of residential stormwater BMPs, implement pet waste stations in public areas, adopt-a-street program.

Table 5 provides the anticipated activities for a typical permit reporting year including (Part I.E.2.h.(3)):

- A description of the public involvement activities to be implemented by the Town,
- The anticipated time period the activities will occur, and
- A metric for each activity to determine if the activity is beneficial to water quality. An example of metrics may include the weight of trash collected from a stream cleanup, the number of participants in a hazardous waste collection event.

Table 5: Anticipated Public Involvement Activities per Reporting Year			
Category	**Activity Description**	**Anticipated Time Period for the Activity to Occur**	**Metric to Determine Benefit to Water Quality**
Restoration	Stream Clean-up Event	July 1 – June 30	Number of participants/ bags of trash
Restoration	Stream Clean-up Event	July 1 – June 30	Number of participants / bags of trash
Public Education Activities	Stormwater Education Days for School or Camps	July 1 – June 30	Number of participants
Public Education Activities	Stormwater Information Booth at Local Event	July 1 – June 30	Quantity of Educational Items or Alternative Materials Distributed

Necessary documentation for implementation: (1) A description of public involvement activities to be implemented; (2) Anticipated time period the activities will occur; and (3) Metric for each activity to determine if the activity is beneficial to water quality.

Responsible individual for implementation: Engineering, Public Works, and Public Relations Departments

Implementation schedule: Public participation will be conducted a minimum of four times a year at the anticipated times indicated in Table 5.

Measurable goal: Effectiveness will be determined by the selected metric for each activity. Effectiveness will be determined by successful public turn-out or exposure to each event. Selection of specific events may be modified from year to year based on opportunity, the potential impact of the audience that can be reached and anticipated public turn-out.

BMP 3.1 Storm Sewer Map and Outfall Information Table (Part I.E.3)

Description: The Town shall develop and maintain an accurate MS4 map and information table as follows (Part I.E.3.a):

- An updated map of the MS4 owned or operated by the Town within MS4 regulated service area no later than 24 months (November 1, 2025) after the permit effective date that includes, at a minimum (Part I.E.3.a.(1)):
    - MS4 outfalls discharging to surface waters, except as follows (Part I.E.3.a.(1)(a)):
        - In cases where the outfall is located outside of the Town's legal responsibility, The Town may elect to map the known point of discharge location closest to the actual outfall; and
        - In cases where the MS4 outfall discharges to receiving water channelized underground, The Town may elect to map the point downstream at which the receiving water emerges above ground as an outfall discharge location. If there are multiple outfalls discharging to an underground channelized receiving water, the map shall identify that an outfall discharge location represents more than one outfall. This is an option The Town may choose to use and recognizes the difficulties in accessing outfalls to underground channelized stream conveyances for purposes of mapping, screening, or monitoring.
    - A unique identifier for each mapped item required in Part I.E.3 (Part I.E.3.a.(1)(b));
    - The name and location of receiving waters to which the MS4 outfall or point of discharge discharges (Part I.E.3.a.(1)(c));
    - MS4 regulated service area (Part I.E.3.a.(1)(d)); and
    - Stormwater management facilities owned or operated by the Town (Part I.E.3.a.(1)(e)).
- The Town shall maintain an outfall information table associated with the MS4 map that includes the following information for each outfall or point of discharge for those cases in which the Town elects to map the known point of discharge in accordance with Part I.E.3.a.(1)(a). The outfall information table may be maintained as a shapefile attribute table. The outfall information table shall contain the following (Part I.E.3.a.(2)):
    - A unique identifier as specified on the MS4 map (Part I.E.3.a.(2)(a));
    - The latitude and longitude of the outfall or point of discharge (Part I.E.3.a.(2)(b));
    - The estimated regulated acreage draining to the outfall or point of discharge (Part I.E.3.a.(2)(c));
    - The name of the receiving water (Part I.E.3.a.(2)(d));
    - The 6th Order Hydrologic Unit Code of the receiving water (Part I.E.3.a.(2)(e));
    - An indication as to whether the receiving water is listed as impaired in the Virginia 2022 305(b)/303(d) Water Quality Assessment Integrated Report (Part I.E.3.a.(2)(f)); and
    - The name of any EPA approved TMDLs for which the Town is assigned a wasteload allocation (Part I.E.3.a.(2)(g)).
- No later than 24 months (November 1, 2025) after permit issuance, the Town shall submit to DEQ a format file geodatabase or two shapefiles that contain at a minimum (Part I.E.3.a(3)):
    - A point feature class or shapefile for outfalls with an attribute table containing outfall data elements required in accordance with Part I.E.3.a.(2) (Part I.E.3.a.(3)(a)); and

- A polygon feature class or shapefile for the MS4 service area as required in accordance with Part I.E.3.a.(1)(d) with an attribute table containing the following information (Part I.E.3.a.(3)(b)):
    - MS4 operator name;
    - MS4 permit number (VAR04); and
    - MS4 service area total acreage rounded to the nearest hundredth.
- All file geodatabase feature classes or shapefiles shall be submitted in the following data format standards (Part I.E.3.a.(4)):
    - Point data in NAD83 or WGS84 decimal degrees global positional system coordinates (Part I.E.3.a.(4)(a));
    - Data projected in Virginia Lambert Conformal Conic format (Part I.E.3.a.(4)(b));
    - Outfall location accuracy shall be represented in decimal degrees rounded to at least the fifth decimal place for latitude and longitude to ensure point location accuracy (e.g., 37.61741, -78.15279) (Part I.E.3.a.(4)(c)); and
    - Metadata that shall provide a description of each feature class or shapefile dataset, units of measure as applicable, coordinate system, and projection (Part I.E.3.a.(4)(d)).

- No later than October 1 of each year, the Town shall update the MS4 map and outfall information table to include any new outfalls constructed or approved or both during the immediate preceding reporting period (Part I.E.3.a.(5)).
- The Town shall provide written notification to any downstream adjacent MS4 of any known physical interconnection established or discovered after the effective date of this permit (PartI.E.3.a.(6)).

Table 6: List of Interconnected MS4 Regulated Area(s)
Virginia Department of Transportation Montgomery County

* The Town will notify any new or newly found MS4 interconnections in writing that might occur with new development or be found while performing other work.

Necessary documentation for implementation: (1) Storm sewer system map; (2) Outfall Information Table; and (3) GIS compatible geodatabase or shapefiles of MS4 map; and (4) If applicable, written notification of physical interconnections to the downstream MS4s.

Responsible individual for implementation: Engineering Department

Implementation schedule: The MS4 map and information table will be updated annually at the end of each reporting year. Any new MS4 interconnections will be notified upon discovery.

Measurable goals: Effectiveness will be determined by maintaining an up-to-date map of the storm sewer map and outfall information table and by submitting the GIS-compatible geodatabase or shapefiles of the storm sewer map; and notifying any discovered interconnected MS4s.

BMP 3.2 Prohibit Non-Stormwater Discharges (Part 1.E.3.b)

Description: The Town shall prohibit, through ordinance, policy, standard operating procedures, or other legal mechanism, to the extent allowable under federal, state, or local law, regulations, or ordinances, unauthorized non-stormwater discharges into the MS4. Non-stormwater discharges or flows identified in 9VAC25-890-20 D 3 shall only be addressed if they are identified by the Town as a significant contributor of pollutants discharging to the MS4. Flows that have been identified by the department as de minimis discharges are not significant sources of pollutants to surface water (Part I.E.3.b).

The Town prohibits non-stormwater discharges into the storm sewer system through language provided within the Town's Stormwater Ordinance and reiterated in documents incorporated by reference including Standard Operating Procedures for Construction and Post-Construction and the IDDE Manual, each of which provide methods and procedures for reporting and corrective and disciplinary action.

For effective prohibition of non-stormwater discharges from contractors operating within the jurisdictional boundaries, refer to BMP 6.2.

Necessary documentation for implementation: (1) Chapter 16, Article IV of the Town Code; (2) A list of any instances of violation and summary of actions taken by the Town; and (3) Completed IDDE Follow-up information.

Responsible individual for implementation: Town Manager and Engineering Department

Implementation schedule: Implementation of Chapter 16, Article IV of the Town Code and Standard Operating Procedures will continue.

Measurable goal: Effectiveness will be determined based on the elimination of reported or observed non-stormwater discharges. Effectiveness will also be based on implementation of the inspections, surveillance, monitoring, and enforcement procedures in response to reports.

BMP 3.3 Implement Illicit Discharge Detection and Elimination Procedures (Part I.E.3.c)

Description: The Town shall maintain, implement, and enforce illicit discharge detection and elimination (IDDE) written procedures designed to detect, identify, and address unauthorized non-stormwater discharges, including illegal dumping, to the MS4 to effectively eliminate the unauthorized discharge. Written procedures shall include (Part I.E.3.c):

- A description of the legal authorities, policies, standard operating procedures, or other legal mechanisms available to the Town to eliminate identified sources of ongoing illicit discharges including procedures for using legal enforcement authorities (Part I.E.3.c.(1)).
- Dry weather field screening protocols to detect, identify, and eliminate illicit discharges to the MS4. The protocol shall include (Part I.E.3.c.(2)):
    - A prioritized schedule of field screening activities and rationale for prioritization determined by the Town based on such criteria as age of the infrastructure, land use, historical illegal discharges, dumping or cross connections (Part I.E.3.c.(2)(a));
    - If the total number of MS4 outfalls is equal to or less than 50, a schedule to screen all outfalls annually (Part I.E.3.c.(2)(b));
    - If the total number of MS4 outfalls is greater than 50, a schedule to screen a minimum of 50 outfalls annually such that no more than 50% are screened in the previous 12-month period. The 50% criteria is not applicable if all outfalls have been screened in the previous three years (Part I.E.3.c.(2)(c));
    - The Town may adopt a risk-based approach to dry weather screening identifying observation points based upon illicit discharge risks upstream of an outfall. Observation points may include points of interconnection, manholes, points of discharge, conveyances, or inlets suspected to have a high likelihood of receiving illicit discharges (Part I.E.3.c.(2)(d));
    - Each observation point screened may be counted as one outfall screening activity equivalent and counted towards the requirements of Part I.E.3.c.(2)(b) or Part I.E.3.c.(2)(c); however, at least 50% of the minimum annual screening events must include outfall screening (Part I.E.3.c.(2)(e));
    - Illicit discharges reported by the public and subsequent investigations may not be counted as screening events; however, once the resolution of the investigation and the date the investigation was closed has been documented, an observation point may be established for future screening events (Part I.E.3.c.(2)(f)); and
    - A checklist or mechanism to track the following information for dry weather screening events (Part I.E.3.c.(2)(g)):
        - The unique identifier for the outfall or observation point;
        - Time since the last precipitation event;
        - The estimated quantity of the last precipitation event;
        - Site descriptions (e.g., conveyance type and dominant watershed land uses);
        - Observed indicators of possible illicit discharge events, such as floatables, deposits, stains, and vegetative conditions (e.g., dying or dead vegetation, excessive vegetative growth);
        - Whether or not a discharge was observed;
        - If a discharge was observed, the estimated discharge and visual characteristics of the discharge (e.g., odor, color, clarity) and the physical condition of the outfall; and
        - For observation points, the location, downstream outfall unique identifier, and risk factors or rationale for establishing the observation point.

- A timeframe upon which to conduct an investigation to identify and locate the source of any observed unauthorized non-stormwater discharge. Priority of investigations shall be given to discharges of sanitary sewage and those believed to be a risk to human health and public safety. Discharges authorized under a separate VPDES or state permit require no further action under this permit (Part I.E.3.c.(3)).
- Methodologies to determine the source of all illicit discharges. If the Town is unable to identify the source of an illicit discharge within six months of beginning the investigation then the Town shall document that the source remains unidentified. If the observed discharge is intermittent, The Town shall document that attempts to observe the discharge flowing were unsuccessful (Part I.E.3.c.(4)).
- Methodologies for conducting a follow-up investigation for illicit discharges that are continuous or that the Town expects to occur more frequently than a one-time discharge to verify that the discharge has been eliminated except as provided for in Part I.E.3.c.(4). (Part I.E.3.c.(5));
- A mechanism to track all illicit discharge investigations to document the following (Part I.E.3.c.(6)):
    - The dates that the illicit discharge was initially observed, reported, or both (Part I.E.3.c.(6)(a));
    - The results of the investigation, including the source, if identified (Part I.E.3.c.(6)(b));
    - Any follow-up to the investigation (Part I.E.3.c.(6)(c));
    - Resolution of the investigation (Part I.E.3.c.(6)(d)); and
    - The date that the investigation was closed (Part I.E.3.c.(6)(e)).

The IDDE procedures described in Part I.E.3.c, the MS4 map and outfall information table are incorporated into the MS4 Program plan by reference. The map shall be made available to the department within 14 days upon request.

Necessary documentation for implementation: (1) Illicit Discharge Detection and Elimination (IDDE) Manual; (2) Outfall Prioritization Methodology; (3) Outfall Information Table; (4) Storm Sewer map; (5) Outfall screening field forms; (6) and (6) IDDE Follow-Up Information.

Responsible individual for implementation: Engineering and Public Works Departments, Town Manager, and Fire Chief

Implementation schedule: Annual outfall screening, as described in the Town's IDDE Program Manual that includes the schedules, mechanisms, and procedures described in this BMP and the General Permit.

Measurable goals: Effectiveness will be determined by maintaining, implementing, and enforcing illicit discharge detection and elimination (IDDE) written procedures.

BMP 4.1 ESC Compliance for Land Disturbing Activities (Part I.E.4)

Description: The Town shall utilize its legal authority, such as ordinances, permits, orders, specific contract language, and interjurisdictional agreements, to address discharges entering the MS4 from regulated construction site stormwater runoff. The Town shall control construction site stormwater runoff as follows (Part I.E.4.a):

The Town shall require implementation of appropriate controls to prevent non-stormwater discharges to the MS4, such as wastewater, concrete washout, fuels and oils, and other illicit discharges identified during land disturbing activity inspections. The discharge of non-stormwater discharges other than those identified in 9VAC25-890-20 D through the MS4 is not authorized by this state permit (Part I.E.4.b).

Employees and contractors serving as plan reviewers, inspectors, program administrators, and construction site operators shall obtain the appropriate certifications as required under the Virginia Erosion and Sediment Control Law and its attendant regulations (Part I.E.4.c).

The Ordinance provides for the following:

- A description of the legal authorities utilized to ensure compliance with Part I.E.4. for erosion and sediment control and construction site stormwater runoff control such as ordinances, permits, orders, specific contract language, policies, and interjurisdictional agreements (Part I.E.4.d.(4));
- Written inspection procedures to ensure VESCP requirements are maintained in accordance with 9VAC25-840-90 A and onsite erosion and sediment controls are properly implemented in accordance with 9VAC25-840-60 B;(Part I.E.4.d.(5);
- Written procedures for requiring VESCP compliance through corrective action or enforcement action in accordance with § 62.1-44.15:58 of the Code of Virginia (Part I.E.4.d.(7)); and
- The roles and responsibilities of each of The Town's departments, divisions, or subdivisions in implementing the erosion and sediment control and construction site stormwater runoff control requirements in Part I.E.4. (Part I.E.4.d.(9)).

The Town has adopted a Virginia Erosion and Sediment Control Program (VESCP) and shall implement the VESCP consistent with the Virginia Erosion and Sediment Control Law (§ 62.1-44.15:51 et seq. of the Code of Virginia) and Virginia Erosion and Sediment Control Regulations (9VAC25-840).

Regulated land disturbance activity in the Town is subject to Chapter 16, Article II of the Town Code (Erosion and Sediment Control). Regulated land disturbance activities are those defined in §62.1-44.15:51 of the Code of Virginia that result in the disturbance of 10,000 square feet or greater and those on individual residential lots or sections of residential developments being developed by different property owners and where the total land disturbance of the residential development is 10,000 square feet or greater. The Town can utilize an agreement in lieu of a plan as provided in §62.1-44.15:55 of the Code of Virginia for single family homes in this category of land disturbances.

Section 16-25 of Article II requires a land disturbance permit from the Town prior to engaging in land disturbance activity that is conditioned on an approved erosion and sediment control plan or an agreement in lieu of a plan in accordance with the Erosion and Sediment Control Law (§62.1-44.15:51 et seq. of the Code of Virginia). Plans shall be compliant with the minimum standards identified in 9VAC25-840-40 of the Erosion and Sediment Control Regulations.

Section 16-27 of Article II provides legal authority for the Town to conduct inspections with an inspector holding an ESC Inspector's Certification from DEQ. Inspections will be conducted:

- Upon initial installation of erosion and sediment controls;
- At least once during every two-week period;
- Within 48 hours of any runoff-producing storm event; and
- Upon completion of the project and prior to the release of any applicable performance bonds.

The Town's Construction Standard Operating Procedures document (available upon request) describes the documentation and inspection procedures used to perform land disturbance inspections. Documentation used during inspections include the VESCP-approved ESC Plans and the Town inspection checklists.

Section 16-24 of Article II also provides legal authority for the Town to require compliance with the approved plan and require changes to an approved plan when an inspection finds that the approved plan is inadequate. Orders that the Town uses to ensure compliance include "Notice of Inspection", "Notice to Comply" and "Stop-Work" Letters. If the non-compliance is not resolved, or escalates, then the Town's ordinance specifies that legal action and conditions that the Town may pursue including civil penalties, court orders, or misdemeanor charges and the ability to revoke the land disturbance permit.

The Town shall require implementation of appropriate controls to prevent non-stormwater discharges to the MS4, such as wastewater, concrete washout, fuels and oils, and other illicit discharges identified during land disturbing activity inspections of the MS4. This is accomplished in regulated land disturbance by requiring compliance with the VSMP Regulation for most land disturbing activities at or above 10, 000 sf. The discharge of non-stormwater discharges other than those identified in 9VAC25-890-20 D through the MS4 is not authorized by this state permit.

Necessary documentation for implementation: (1) Chapter 16, Article II of Town Code; (2) ESC Plan(s) approved by the Town, include procedures and documents used in plan review; (3) Documentation of ESC Inspector Certification; (4) Completed ESC Inspection Forms for each regulated project; (5) Total number of inspections conducted, number of enforcement actions implemented and type of enforcement actions implemented.

Roles and responsible individual for implementation: Engineering Department and Town Manager

Implementation schedule: The implementation of this BMP will be ongoing with all regulated land disturbing activities that disturb greater than or equal to 10,000 square feet within the jurisdiction.

Measurable goals: Effectiveness will be determined by the implementation of the procedures, review, inspection, and enforcement described in the Town Code. A measurable component is the number of enforcement actions (notice to comply or stop work orders).

BMP 5.1 Compliance to Post-Construction Stormwater Management Regulation (Part 1.E.5)

Description: The Town shall address post-construction stormwater runoff that enters the MS4 from the following land disturbing activities by implementing a post-construction stormwater runoff management program as follows (Part I.E.5.a):

- The Town shall implement the VSMP consistent with the Virginia Stormwater Management Act (§ 62.1-44.15:24 et seq. of the Code of Virginia) and VSMP Regulations (9VAC25-870) as well as maintain an inspection and maintenance program in accordance with Part I.E.5.b (Part I.E.5.a.(1)).

The Town shall implement an inspection and maintenance program for those stormwater management facilities owned or operated by the Town as follows (Part I.E.5.b):

- Within six months of the permit effective date, the Town shall develop and maintain written inspection and maintenance procedures in order to ensure adequate long-term operation and maintenance of its stormwater management facilities. The Town may use inspection and maintenance specifications available from the Virginia Stormwater BMP Clearinghouse, the VSMH, current edition, or inspection and maintenance plans developed in accordance with the department's Stormwater Local Assistance Fund (SLAF) guidelines (Part I.E.5.b.(1));
- Employees and contractors implementing the stormwater program shall obtain the appropriate certifications as required under the Virginia Stormwater Management Act and its attendant regulations (Part I.E.5.b.(2));
- The Town shall inspect stormwater management facilities owned or operated by Town no less frequently than once per year. The Town may choose to implement an alternative schedule to inspect these stormwater management facilities based on facility type and expected maintenance needs provided that the alternative schedule and rationale is included in the MS4 Program plan. The alternative inspection frequency shall be no less often than once per five years (Part I.E.5.b.(3)); and
- If during the inspection of the stormwater management facility conducted in accordance with Part I.E.5.b.(2), it is determined that maintenance is required, the Town shall conduct the maintenance in accordance with the written procedures developed under Part I.E.5.b.(1) (Part I.E.5.b.(4)).

The Town shall implement an inspection and enforcement program for stormwater management facilities not owned by the Town (i.e., privately owned) that includes (Part I.E.5.c.(1)):

- An inspection frequency of no less than once per five years for all privately- owned stormwater management facilities that discharge into the MS4 (Part I.E.5.c.(1)(a)); and
- Adequate long-term operation and maintenance by the owner of the stormwater management facility by requiring the owner to develop and record a maintenance agreement, including an inspection schedule to the extent allowable under state or local law or other legal mechanism (Part I.E.5.c.(1)(b));
- Utilize its legal authority for enforcement of the maintenance responsibilities in accordance with 9VAC25-870-112 if maintenance is neglected by the owner (Part I.E.5.c.(2));
- The Town may develop and implement a progressive compliance and enforcement strategy provided that the strategy is included in the MS4 program plan (Part I.E.5.c.(3)); and
- The Town may utilize the inspection reports provided by the owner of a stormwater management facility as part of an inspection and enforcement program in accordance with 9VAC25-870-114 C (Part I.E.5.c.(4)).

The Town shall include in the MS4 Program Plan the following (Part I.E.5.(d)):

- If the permittee implements a VSMP (Part I.E.5.d.(1)).
    - A copy of the VSMP approval letter issued by the department (Part I.E.5.d.1(a)).
    - Written inspection procedures and all associated documents utilized in the inspection of privately owned stormwater management facilities (Part I.E.5.d.1(b)).
    - Written procedures for compliance and enforcement of inspection and maintenance requirements for privately owned stormwater management facilities (Part I.E.5.d.1(c)).
- A description of the legal authorities utilized to ensure compliance with Part I.E.5.a for post-construction stormwater runoff control such as ordinances, permits, orders, specific contract language, and interjurisdictional agreements (Part I.E.5.d.(3));
- Written inspection and maintenance procedures and other associated template documents utilized during inspection and maintenance of stormwater management facilities owned or operated by the Town (Part I.E.5.d.(4)); and
- The roles and responsibilities of each of the Town's departments, divisions, or subdivisions in implementing the post-construction stormwater runoff control program (Part I.E.5.d.(5)).

The Town will ensure post-construction stormwater management (SWM) for all regulated land disturbing activities over 10,000 square feet through plan approval in accordance with the Town Ordinances for Erosion and Sediment Control and Stormwater Management. Approval from the Town will ensure the SWM plan has been prepared per the VSMP Regulations that, in part, require that stormwater runoff controls:

- Are designed and installed in accordance with the appropriate water quality and water quantity design criteria as required in Part II (9VAC25-870-40 et seq.) of 9VAC25-870; and
- Have an inspection and maintenance plan.

The Town enforces stormwater maintenance and inspections as outlined in their Standard Operating Procedures (available upon request) and as specified in the Town Ordinance Section 16-60 through 16-65 (Part I.E.5.d.(3)). Written procedures and all associated documents used in the inspection of stormwater management facilities, and for compliance and enforcement of inspection and maintenance requirements for privately owned stormwater management facilities (Part I.E.5.d.(b) & (c)).

The Town will use the SWM facility inspection and maintenance plans from the approved stormwater management plan for proposed stormwater management facilities to be used with the implementation of BMP 5.1.

The Town will perform long-term operations and maintenance of all stormwater facilities utilizing the inspection and maintenance plans obtained from implementation of BMP 5.1. Where inspection and maintenance plans are not available from approved SWM plans, the Town will utilize BMP-specific inspection and maintenance instruction from the Virginia Stormwater Management Handbook or the Town Post-Construction Stormwater Manual. Inspections will be performed either:

- As dictated on the schedule provided on the inspection and maintenance plans; or
- A minimum of once annually, whichever are the more frequent criteria.

Inspections will be performed using the best management practice (BMP) inspection and maintenance checklist, corresponding with the type of BMP, as provided in either the Town Post-Construction Stormwater Manual or the latest edition of the Virginia Stormwater Management Handbook. The checklists provide lists of potential issues and methods to address the issue. Necessary maintenance identified during inspections will be conducted in a timely manner or depending on the complexity of the

maintenance which may result in an alternative schedule indicated on the SWM Facility Tracking Database.

Necessary documentation for implementation: (1) Town approved SWM Plans and Calculations (maintained on active construction sites); (2) Material used for plan review (e.g. checklists, BMP Clearinghouse Standards and Specifications); (3) SWM Facility Inspection and Maintenance Plans for approved projects with SWM facilities; (4) Proof of records for inspection and maintenance agreements and easements.

Responsible individual for implementation: Engineering and Public Works Departments

Implementation schedule: The implementation of this BMP will be ongoing with all regulated land disturbing activities.

Measurable goals: Effectiveness will be measured by the implementation of the inspection and maintenance program on post-construction stormwater management facilities; all regulated land disturbance activities having a Town approved SWM Plan; and all stormwater management facilities with recorded inspection and maintenance plans and/or agreements, where applicable.

BMP 6.1 Pollution Prevention Procedures for Operations & Maintenance Activities (Part 1.E.6)

Description: The Town shall maintain and implement written good housekeeping procedures for those activities listed in Part I.E.6.b at facilities owned or operated by the Town designed to meet the following objectives (Part I.E.6.a):

- Prevent illicit discharges (Part I.E.6.a.(1));
- Ensure the Town staff or contractors properly dispose of waste materials, including landscape wastes and prevent waste materials from entering the MS4 (Part I.E.6.a.(2));
- Prevent the discharge of wastewater or wash water not authorized in accordance with 9VAC25-890-20 D.3.u, into the MS4 without authorization under a separate VPDES permit (Part I.E.6.a.(3)); and
- Minimize the pollutants in stormwater runoff (Part I.E.6.a.(4)).

The Town shall develop and implement written good housekeeping procedures that meet the objectives established in Part I.E.6.a for the following activities (Part I.E.6.b):

- Road, street, sidewalk, and parking lot maintenance and cleaning (Part I.E.6.b.(1)):
    - Within 24 months (November 1, 2025) of permit issuance, The Town shall update and implement procedures in accordance with Part I.E to include implementation of best management practices for anti-icing and deicing agent application, transport, and storage (Part I.E.6.b.(1)(a));
    - Procedures developed in accordance with Part I.E shall prohibit the application of any anti-icing or deicing agent containing urea or other forms of nitrogen or phosphorus (Part I.E.6.b.(1)(b));
- Renovation and significant exterior maintenance activities (e.g., painting, roof resealing, and HVAC coil cleaning) not covered under a separate VSMP construction general permit. The Town shall develop and implement procedures no later than 36 months (November 1, 2026) after permit issuance (Part I.E.6.b.(2));
- Discharging water pumped from construction and maintenance activities not covered by another permit covering such activities (Part I.E.6.b.(3));
- Temporary storage of landscaping materials (Part I.E.6.b.(4));
- Maintenance of the Town owned or operated vehicles and equipment (i.e., prevent pollutant discharges from leaking the Town owned vehicles and equipment) (Part I.E.6.b.(5));
- Application of materials, including pesticides and herbicides shall not exceed manufacturer's recommendations (Part I.E.6.b.(6)); and
- Application of fertilizer shall not exceed maximum application rates established by applicable nutrient management plans. For areas not covered under nutrient management plans where fertilizer is applied, application rates shall not exceed manufacturer's recommendations (Part I.E.6.b.(7)).

A list of written good housekeeping procedures for the operations and maintenance activities as required by Part I.E.6.a and b are included in the Good Housekeeping and Pollution Prevention Program Manual incorporated by reference (Part I.E.6.x.(1)).

Necessary documentation for implementation: (1) The Town Good Housekeeping/Pollution Prevention Program Manual; (2) Site-specific SWPPPs; (3) Training documentation; (4) Completed Comprehensive Site Evaluation forms. All documentation is incorporated into the Good Housekeeping/Pollution Prevention Program Manual; and (5) Nutrient Management Plans.

Responsible individual for implementation: Engineering, Public Works, and Parks and Recreation Departments

Implementation schedule: Training will be provided once every 24 months, and facility evaluations will be performed with the schedule described in BMP 6.2. No later than June 30 of each year, the Town will annually review any high-priority facility owned or operated by the Town for which a SWPPP has not been developed to determine if the facility has a high potential to discharge potential pollutants. If the facility is determined to be a high priority facility with a high potential to discharge pollutants, the Town will develop a SWPPP no later than December 31 of that same year.

Measurable goals: Effectiveness will be measured by the implementation of a facility-specific Stormwater Pollution Prevention Plan (SWPPP) as described in BMP 6.5, evaluated with a facility compliance evaluation as described for the measure of effectiveness for BMP 6.1, and the Pollution Prevention training described in BMP 6.4.

BMP 6.2 Contractor Safeguards, Measures and Procedures (Part I.E.6.c)

Description: The Town shall require through the use of contract language, training, written procedures, or other measures within the Town's legal authority that contractors employed by the Town and engaging in activities described in Part I.E.6.b follow established good housekeeping procedures and use appropriate control measures to minimize the discharge of pollutants to the MS4.

The Town will use contract language that references the Town Good Housekeeping and Pollution Prevention Manual to require contractors to use appropriate control measures and procedures for stormwater discharges, when applicable. Oversight will be provided by the Town through periodic inspections. Contract language will require contractors to address items identified during inspections within a time period appropriate to prevent the potential of non-stormwater discharges. The contract language will also allow the Town to stop-work, address the problem, and recoup cost for the remedy from the contractor.

Contractors implementing the stormwater program shall obtain the appropriate certifications as required under the Virginia Stormwater Management Act (VSMA) and its attendant regulations.

Contract Language described in this BMP is not intended for regulated land disturbing activity addressed with BMPs 4.1, 5.1, and 6.1.

Necessary documentation for implementation: (1) Good Housekeeping and Pollution Prevention Manual; and (2) Contract Language

Responsible individual for implementation: Engineering and Finance Departments

Implementation schedule: The Town will continue to incorporate language into contracts to ensure contractors engaging in activities with the potential to discharge pollutants use appropriate control measures to minimize the discharge of pollutants to the MS4.

Measurable goals: Effectiveness will be measured by all signed contracts executed with contract good housekeeping and pollution prevention language.

BMP 6.3 Contractor Certification for Pesticide Application (Part I.E.6.d.(6))

Description: Employees and contractors hired by the Town who apply pesticides and herbicides are trained or certified in accordance with the Virginia Pesticide Control Act (§ 3.2-3900 et seq. of the Code of Virginia). Certification by the Virginia Department of Agriculture and Consumer Services (VDACS) Pesticide and Herbicide Applicator program shall constitute compliance with this requirement. Contracts for the application of pesticide and herbicides executed after the effective date of this permit shall require contractor certification (Part I.E.6.d.(6)).

Necessary documentation for implementation: (1) Contract language; and/or (2) Proof of certifications

Responsible individual for implementation: Engineering, Finance and Public Works Departments

Implementation schedule: The Town will continue to ensure contractor and/or staff certifications for the application of pesticides and herbicides.

Measurable goal: Effectiveness will be measured by all signed contracts executed for pesticide and herbicide application and/or staff will maintain their certifications.

BMP 6.4 Employee Good Housekeeping/Pollution Prevention Training Plan (Part 1.E.6.d)

Description: The written procedures established in accordance with Part I.E.6.a and b shall be utilized as part of the employee training program, and the Town shall develop a written training plan for applicable field personnel that ensures the following (Part I.E.6.d):

- Applicable field personnel shall receive training in the prevention, recognition, and elimination of illicit discharges no less often than once per 24 months (Part I.E.6.d.(1));
- Employees performing road, street, sidewalk, and parking lot maintenance shall receive training in good housekeeping procedures required under Part I.E.6.b.(1) no less often than once per 24 months (Part I.E.6.d.(2));
- Employees working in and around facility maintenance, public works, or recreational facilities shall receive training in applicable Part I E 6 a and b good housekeeping procedures required no less often than once per 24 months (Part I.E.6.d.(3));
- Employees working in and around high-priority facilities with a stormwater pollution prevention plan (SWPPP) shall receive training in applicable site specific SWPPP procedures no less often than once per 24 months (Part I.E.6.d.(4));
- Employees whose duties include emergency spill control and response shall be trained in spill control and response. Emergency responders, such as firefighters and law-enforcement officers, trained on the handling of spill control and response as part of a larger emergency response training shall satisfy this training requirement and be documented in the training plan (Part I.E.6.d.(5)); and
- Employees and contractors hired by the Town who apply pesticides and herbicides shall be trained and certified in accordance with the Virginia Pesticide Control Act (§ 3.2-3900 et seq. of the Code of Virginia). Certification by the Virginia Department of Agriculture and Consumer Services (VDACS) Pesticide and Herbicide Applicator program shall constitute compliance with this requirement. Contracts for the application of pesticide and herbicides executed after the effective date of this permit shall require contractor certification (Part I.E.6.d.(6)).

The Town shall maintain documentation of each training activity conducted by the Town to fulfill the requirements of Part I.E.6.d for a minimum of three years after the training activity completion. The documentation shall include the following information (Part I.E.6.e):

- The date when applicable employees have completed the training activity (Part I.E.6.e.(1));
- The number of employees who have completed the training activity (Part I.E.6.e.(2)); and
- The training objectives and good housekeeping procedures required under Part I.E.6.a covered by training activity (Part I.E.6.e.(3)).

The Town may fulfill the training requirements in Part I.E.6.d, in total or in part, through regional training programs involving two or more MS4 permittees; however, the Town shall remain responsible for ensuring compliance with the training requirements (Part I.E.6.f).

The Town will incorporate a written training plan into its Good Housekeeping/Pollution Prevention and IDDE Program Manuals, including a schedule of training events. The Program Manuals will serve as the training material and include Appendices to document training and list relevant staff.

Necessary documentation for implementation: (1) Training documentation or appropriate certifications for employees; (2) IDDE Manual; and (3) Good Housekeeping/Pollution Prevention Program Manual.

Responsible individual for implementation: Engineering, Public Works, and Parks and Recreation Departments, and Fire Chief.

Implementation schedule: Training for illicit discharge and good housekeeping will occur no less than every 24 months. Certifications will be maintained, and proof of certification updated as appropriate.

Measurable goals: Effectiveness will be determined by the training occurring no less than every 24 months, and proof of certifications updated as appropriate.

BMP 6.5 Site Stormwater Pollution Prevention Plan (Part 1.E.6.g)

Description: Within 12 months (November 1, 2024) the Town shall identify any new high-priority facilities located in expanded 2020 census urban areas with a population of at least 50,000 (Part I.E.6.g); and within 36 months (November 1, 2026) the Town shall implement SWPPPs for high-priority facilities meeting the conditions of Part I.E.6.i and which are located in expanded 2020 census urban areas with a population of at least 50,000 (Part I.E.6.h).

The Town shall maintain and implement a site-specific SWPPP for each high priority facility as defined in 9VAC25-890-1 that does not have or require separate VPDES permit coverage, and which any of the following materials or activities occur and are expected to have exposure to stormwater resulting from rain, snow, snowmelt or runoff (Part I.E.6.i):

- Areas where residuals from using, storing or cleaning machinery or equipment remain and are exposed to stormwater (Part I.E.6.i.(1));
- Materials or residuals on the ground or in stormwater inlets from spills or leaks (Part I.E.6.i.(2));
- Material handling equipment (Part I.E.6.i.(3));
- Materials or products that would be expected to be mobilized in stormwater runoff during loading or unloading or transporting activities (e.g., rock, salt, fill dirt) (Part I.E.6.i.(4));
- Materials or products stored outdoors (except final products intended for outside use where exposure to stormwater does not result in the discharge of pollutants) (Part I.E.6.i.(5));
- Materials or products that would be expected to be mobilized in stormwater runoff contained in open, deteriorated or leaking storage drums, barrels, tanks, and similar containers (Part I.E.6.i.(6));
- Waste material except waste in covered, nonleaking containers (e.g., dumpsters) (Part I.E.6.i.(7));
- Application or disposal of process wastewater (unless otherwise permitted) (Part I.E.6.i.(8)); or
- Particulate matter or visible deposits of residuals from roof stacks, vents or both not otherwise regulated (i.e., under an air quality control permit) and evident in the stormwater runoff (Part I.E.6.i.(9)).

Each SWPPP as required in Part I.E.6.g shall include the following (Part I.E.6.j):

- A site description that includes a site map identifying all outfalls, direction of stormwater flows, existing source controls, and receiving water bodies (Part I.E.6.j.(1));
- A description and checklist of the potential pollutants and pollutant sources (Part I.E.6.j.(2));
- A description of all potential non-stormwater discharges (Part I.E.6.j.(3));
- A description of all structural control measures, such as stormwater management facilities and other pollutant source controls, applicable to SWPPP implementation (e.g., permeable pavement or oil-water separators that discharge to sanitary sewer are not applicable to the SWPPP), such as oil-water separators, and inlet protection designed to address potential pollutants and pollutant sources at risk of being discharged to the MS4(Part I.E.6.j.(4));
- A maintenance schedule for all stormwater management facilities and other pollutant source controls applicable to SWPPP implementation described in Part I.E.6.h.(4) (Part I.E.6.j.(5));
- Site specific written procedures designed to reduce and prevent pollutant discharge that incorporate by reference applicable good housekeeping procedures required under Part I.E.6.a and b (Part I.E.6.j.(6));
- A description of the applicable training as required in Part I.E.6.d.(4) (Part I.E.6.j.(7));

- An inspection frequency of no less often than once per year and maintenance requirements for site specific source controls. The date of each inspection and associated findings and follow-up shall be logged in each SWPPP (Part I.E.6.j.(8));
- A log of each unauthorized discharge, release, or spill incident reported in accordance with Part IV.G including the following information (Part I.E.6.j.(9)):
    - Date of incident;
    - Material discharged, released, or spilled; and
    - Estimated quantity discharged, released, or spilled.
- A log of modifications to the SWPPP made as the result of any unauthorized discharge, release, or spill in accordance Part I.E.6.j or changes in facility activities and operation requiring SWPPP modification (Part I.E.6.j.(10)); and
- The point of contact for SWPPP implementation (Part I.E.6.j.(11)).

No later than June 30 of each year, the Town shall annually review any high-priority facility owned or operated by the Town for which an SWPPP has not been developed to determine if the facility meets any of the conditions described in Part I.E.6.g. If the facility is determined to need an SWPPP, the Town shall develop an SWPPP meeting the requirements of Part I.E.6.h no later than December 31 of that same year. the Town shall maintain a list of all high-priority facilities owned or operated by the Town not required to maintain an SWPPP in accordance with Part I.E.6.g and this list shall be available upon request (Part I.E.6.k).

The Town shall review the contents of any site-specific SWPPP no later than 30 days after any unauthorized discharge, release, or spill reported in accordance with Part IV.G to determine if additional measures are necessary to prevent future unauthorized discharges, releases, or spills. If necessary, the SWPPP shall be updated no later than 90 days after the unauthorized discharge (Part I.E.6.l).

The SWPPP shall be kept at the high-priority facility and utilized as part of employee SWPPP training required in Part I.E.6.d(4). The SWPPP and associated documents may be maintained as a hard copy or electronically as long as the documents are available to employees at the applicable site (Part I.E.6.m).

If activities change at a facility such that the facility no longer meets the definition of a high-priority facility, the Town may remove the facility from the list of high-priority facilities with a high potential to discharge pollutants (Part I.E.6.n).

If activities change at a facility such that the facility no longer meets the criteria requiring SWPPP coverage as described in Part I.E.6.g, the Town may remove the facility from the list of high-priority facilities that require SWPPP coverage (Part I.E.6.o).

The Town will not apply any deicing agent containing urea or other forms of nitrogen or phosphorus to parking lots, roadways, and sidewalks, or other paved surfaces (Part I.E.6.b.(1)(b)).

The SWPPP will provide instruction for updates, as necessary, to reflect changes, modifications to operations and maintenance procedures, or shortcomings resulting in a reportable spill. Inspection forms will be completed in accordance with the prescribed schedule within the SWPPP and maintained on file at the facility.

The Town shall provide a list of all high-priority facilities owned or operated by the Town required to maintain a SWPPP in accordance with Part I.E.6.g that includes the facility name, facility location, and the location of the SWPPP hardcopy or electronic document being maintained. The SWPPP for each high-priority facility shall be incorporated by reference (Part I.E.6.x.(2)).

Table 7: List of High Priority Facilities		
High Priority Facility	**Facility Location**	**Location of SWPPP Being Maintained**
Public Works Operation Center	300 Scattergood Drive	Public Works Operations Center
Wades Lane Landfill Staging and Stockpile Area	Wades Lane	Public Works Operations Center

Necessary documentation for implementation: (1) Good Housekeeping & Pollution Prevention Manual; (2) Site-specific SWPPPs; (3) Annual comprehensive site compliance evaluation forms; and (4) Identification of High Priority Facilities report.

Responsible individual for implementation: Engineering, Public Works, and Parks and Recreation Departments

Implementation schedule: By June 30th every year the Town will review its properties to determine if the facilities meet the criteria of a high priority facility and develop a SWPPP by December 31 of the same permit year. The Town will also review its properties to determine if the properties no longer meet the criteria of a high priority facility. The Town will review the high priority SWPPP no later than 30 days after an unauthorized discharge, release or spill reported in accordance with Part IV.G to determine if additional measures are necessary to prevent future unauthorized discharges, releases, or spills. The SWPPP shall be updated no later than 90 days after the unauthorized discharge. The SWPPP inspection will be completed once per year.

Measurable goals: Effectiveness will be measured by the completed SWPPP inspection once per year; a review of the SWPPP within 30 days after an unauthorized discharge, release or spill reported; and an update to the SWPPP within 90 days after an unauthorized discharge. In addition, effectiveness will be measured by the review of the Town's properties to determine if the properties meet the criteria of a high priority facility and a SWPPP is developed, or no longer meet the criteria of a high priority facility.

BMP 6.6 Turf and Landscape Management (Part I.E.6.p)

Description: The Town shall maintain and implement turf and landscape nutrient management plans that have been developed by a certified turf and landscape nutrient management planner in accordance with § 10.1-104.2 of the Code of Virginia on all lands owned or operated by the permittee where nutrients are applied to a contiguous area greater than one acre (Part I.E.6.p).

Within 12 months of permit coverage, the Town shall identify contiguous areas greater than one acre located in expanded 2020 census urban areas with population of at least 50,000 and within the permittee's MS4 service area requiring turf and landscape nutrient management plans (Part I.E.6.q).

Within 36 months of permit coverage, the Town shall implement turf and landscape nutrient management plans on contiguous areas greater than one acre located in expanded 2020 census urban areas with a population of least 50,000 and within the permittee's MS4 service area (Part I.E.6.r).

If nutrients are being applied to achieve final stabilization of a land disturbance project, application shall follow the manufacturer's recommendations. For newly established turf where nutrients are applied to a contiguous area greater than one acre, the Town shall implement a nutrient management plan no later than six months after the site achieves final stabilization (Part I.E.6.s).

Nutrient management plans developed in accordance with Part I.E.6.n shall be submitted to the Department of Conservation and Recreation (DCR) for approval (Part I.E.6.t). Fertilizer application records will be maintained with each application using the application record provided in the NMP.

Nutrient management plans that are expired as of the effective date of this permit shall be submitted to DCR for renewal within six months (May 1, 2024) after the effective date of this permit. Thereafter, all nutrient management plans shall be submitted to DCR at least 30 days prior to nutrient management plan expiration. Within 36 months (November 1, 2026) of permit coverage, no nutrient management plans maintained by the Town in accordance with Part I.E.6.n shall be expired due to DCR documented noncompliance with 4VAC50-85-130 provided to the Town (Part I.E.6.u).

Nutrient management plans may be maintained as a hard copy or electronically as long as the documents are available to employees at the applicable site (Part I.E.6.v).

The Town shall provide a list of locations for which turf and landscape nutrient management plans are required in accordance with Part I.E.6.p and s, including the following information (Part I.E.6.x.(3)):

- The total acreage covered by each nutrient management plan (Part I.E.6.x.(3)(a));
- The DCR approval date and expiration date for each nutrient management plan (Part I.E.6.x.(3)(b)); and
- The location of the nutrient management plan hardcopy or electronic document being maintained (Part I.E.6.x.(3)).

Table 8: List of Lands where Nutrient Management Plans are Required

Property Name	Total Area (ac.)	DCR Approval Date	Expiration Date	Location of NMPs
Harkrader Sports Complex - Outfield	4.6	10/1/2023	10/1/2026	Parks and Recreation Dept

Harkrader Sports Complex - Infield	0.5	10/1/2023	10/1/2026	Parks and Recreation Dept
Kiwanis Park	1.9	10/1/2023	10/1/2026	Parks and Recreation Dept

Necessary documentation for implementation: (1) Nutrient Management Plans; and (2) Completed Fertilizer Application Records.

Responsible individual for implementation: Engineering, Public Works, and Parks and Recreation Departments

Implementation schedule: The NMP will continue to be updated and modified as needed. Fertilizer application records will be maintained with each application.

Measurable goals: Effectiveness will be measured by the implementation of the NMP through completion of the application record and periodic updates to the NMP to make necessary adjustments based on soil conditions.

3.1 SPECIAL CONDITIONS FOR THE CHESAPEAKE BAY TMDL

The Town is not within the Chesapeake Bay Watershed and therefore, is not subject to the Chesapeake Bay TMDL Special Conditions.

3.2 SPECIAL CONDITIONS FOR LOCAL TMDLS

Description: The Town shall develop and maintain a local TMDL action plan designed to reduce loadings for pollutants of concern if the Town discharges the pollutants of concern to an impaired water for which a TMDL has been approved by the U.S. Environmental Protection Agency (EPA) as described below (Part II.B.2):

- For TMDLs approved by EPA prior to July 1, 2018, and in which an individual or aggregate wasteload has been allocated to the Town, the Town shall develop and initiate or update as applicable the local TMDL action plans to meet the conditions of Part II.B.4, B.6, B.7, and B.8, as applicable, no later than 18 months (May 1, 2025) after the permit effective date and continue implementation of the action plan; Updated action plans shall include (Part II.B.2.a):
  - An evaluation of the results achieved by the previous action plan (Part II.B.2.a.(1)); and
  - Any adaptive management strategies incorporated into updated action plans based on action plan evaluation (Part II.B.2.a.(2)).
- For TMDLs approved by EPA on or after July 1, 2018, and prior to October 31, 2023, and in which an individual or aggregate wasteload has been allocated to the Town, the Town shall develop and initiate implementation of action plans to meet the conditions of Part II.B.4, B.5, B.6, B.7, and B.8, as applicable no later than 30 months (May 1, 2026) after the permit effective date (Part II.B.2.b). The Town shall complete implementation of the TMDL action plans as determined by the schedule. TMDL action plans may be implemented in multiple phases over more than one permit cycle using the adaptive iterative approach provided adequate progress is achieved in the implementation of BMPs designed to reduce pollutant discharges in a manner that is consistent with the assumptions and requirements of the applicable TMDL (Part II.B.3).

The Town shall complete implementation of the TMDL action plans as determined by the schedule. TMDL action plans may be implemented in multiple phases over more than one permit cycle using the adaptive iterative approach provided adequate progress is achieved in the implementation of BMPs designed to reduce pollutant discharges in a manner that is consistent with the assumptions and requirements of the applicable TMDL (Part II.B.3).

Each local TMDL action plan developed by the Town shall include the following (Part II.B.4):

- The TMDL project name (Part II.B.4.a);
- The EPA approval date of the TMDL (Part II.B.4.b);
- The wasteload allocated to the Town (individually or in aggregate), and the corresponding percent reduction, if applicable (Part II.B.4.c);
- Identification of the significant sources of the pollutants of concern discharging to the MS4 that are not covered under a separate VPDES permit. For the purposes of this requirement, a significant source of pollutants of concern means a discharge where the expected pollutant loading is greater than the average pollutant loading for the land use identified in the TMDL (Part II.B.4.d);
- The BMPs designed to reduce the pollutants of concern in accordance with Parts II.B.5, B.6, B.7, and B.8 (Part II.B.4.e);
- Any calculations required in accordance with Part II.B.5, B.6, B.7, or B.8 (Part II.B.4.f);
- For action plans developed in accordance with Part II.B.5, B.6, and B.8, an outreach strategy to enhance the public's education (including employees) on methods to eliminate and reduce discharges of the pollutants (Part II.B.4.g); and

- A schedule of anticipated actions planned for implementation during this permit term (Part II.B.4.h).

Prior to submittal of the action plan required in Part II.B.2, the Town shall provide an opportunity for public comment for no fewer than 15 days on the proposal to meet the local TMDL action plan requirements (Part II.B.9).

The MS4 program plan as required by Part I.B of this permit shall incorporate each local TMDL action plan. Local TMDL action plans may be incorporated by reference into the MS4 program plan provided that the program plan includes the date of the most recent local TMDL action plan and identification of the location where a copy of the local TMDL action plan may be obtained (Part II.B.9).

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

BMP SC1.1 Local Bacteria TMDL Action Plans (Part II.B.5)

Description: The Town shall select and implement at least 3 of the strategies listed in Table 9 designed to reduce the load of bacteria to the MS4. Selection of the strategies shall correspond to sources identified in Part II.B.3.d.

Table 9: Strategies for Bacteria Reduction Stormwater Control/Management Strategy	
Source	**Strategies** (provided as an example and not meant to be all inclusive or limiting)
Domestic pets (dogs and cats)	Provide signage to pick up dog waste, providing pet waste bags and disposal containers. Adopt and enforce pet waste ordinances or policies, or leash laws or policies. Place dog parks away from environmentally sensitive areas. Maintain dog parks by removing disposed of pet waste bags and cleaning up other sources of bacteria. Protect riparian buffers and provide unmanicured vegetative buffers along streams to dissuade stream access.
Urban wildlife	Educate the public on how to reduce food sources accessible to urban wildlife (e.g., manage restaurant dumpsters and grease traps, residential garbage, feed pets indoors). Install storm drain inlet or outlet controls. Clean out storm drains to remove waste from wildlife. Implement and enforce urban trash management practices. Implement rooftop disconnection programs or site designs that minimize connections to reduce bacteria from rooftops. Implement a program for removing animal carcasses from roadways and properly disposing of the same (either through proper storage or through transport to a licensed facility).
Illicit connections or illicit discharges to the MS4	Implement an enhanced dry weather screening and illicit discharge, detection, and elimination program beyond the requirements of Part I E 3 to identify and remove illicit connections and identify leaking sanitary sewer lines infiltrating to the MS4 and implement repairs. Implement a program to identify potentially failing septic systems. Educate the public on how to determine whether their septic system is failing. Implement septic tank inspection and maintenance program. Implement an educational program beyond any requirements in Part I.E.1 though Part I.E.6 to explain to citizens why they should not dump materials into the MS4.

Source	**Strategies** (provided as an example and not meant to be all inclusive or limiting)
Dry weather urban flows (irrigations, car washing, powerwashing, etc.)	Implement public education programs to reduce dry weather flows from storm sewers related to lawn and park irrigation practices, car washing, powerwashing and other nonstormwater flows. Provide irrigation controller rebates. Implement and enforce ordinances or policies related to outdoor water waste. Inspect commercial trash areas, grease traps, washdown practices, and enforce corresponding ordinances or policies.
Birds (Canadian geese, gulls, pigeons, etc.)	Identify areas with high bird populations and evaluate deterrents, population controls, habitat modifications and other measures that may reduce bird-associated bacteria loading. Prohibit feeding of birds.
Other sources	Enhance maintenance of stormwater management facilities owned or operated by the Town. Enhance requirements for third parties to maintain stormwater management facilities. Develop BMPs for locating, transporting, and maintaining portable toilets used on permittee-owned sites. Educate third parties that use portable toilets on BMPs for use. Provide public education on appropriate recreational vehicle dumping practices.

Necessary documentation for implementation: (1) Bacteria Impairment TMDL Action Plan; and (2) Program Plan Updates, as necessary.

Responsible individual for implementation: Engineering Department, Public Works, Parks and Recreation, and Wastewater Treatment Facility

Implementation schedule: Update the Bacteria Impairment TMDL Action Plan no later than 18 months after the permit effective date and continue implementation of the action plan.

Measurable goal: Effectiveness will be determined by the consideration of public comments; and the selection of cost effective BMPs and outreach strategies to enhance the public's education.

BMP SC1.2 Local Bacteria TMDL Action Plan Implementation (Part II.B.5)

Description: The Town will implement strategies annually per the schedule in the Bacteria Impairment TMDL Action Plan.

Necessary documentation for implementation: (1) Bacteria Impairment TMDL Action Plan; and (2) Program Plan Updates, as necessary.

Responsible individual for implementation: Engineering Department and Wastewater Treatment Facility

Implementation schedule: The implementation of the Bacteria Impairment TMDL Action Plan (Table 10) will be updated subsequent to DEQ approval of the updated TMDL Action Plan.

Table 10: Bacteria Impairment TMDL Action Plan Implementation	
Strategies	**Method**
Domestic pets	Provide pet waste bags and disposal containers in public parks. Enhance outreach efforts to the pet owning populace.
Illicit connections or illicit discharges to the MS4	Continue implementation of the Crab Creek Interceptor Study. Continue implementation of Sections 36-96 and 36-97 of the Town Code requiring connection to the town's sanitary sewer, if available, if a septic system needs to be pumped or repaired. Continue implementation of the Fats, Oils and Grease (FOG) program as outlined in the Town Code Section 36-212, to help prevent sanitary sewer overflows.

Measurable goal: Effectiveness will be determined by the implementation of the actions in the schedule.

BMP SC2.1 Sediment TMDL Action Plan (Part II.B.6)

Description: For local sediment TMDLs (Part II.B.6):

- The Town shall reduce the loads associated with sediment through implementation of one or more of the following (Part II.B.6.a):
    - One or more of the BMPs from the Virginia Stormwater BMP Clearinghouse listed in 9VAC25-870-65 or other approved BMPs found on the Virginia Stormwater BMP Clearinghouse website (Part II.B.6.a.(1));
    - One or more BMPs approved by the Chesapeake Bay Program. Pollutant load reductions generated by annual practices, such as street and storm drain cleaning, shall only be applied to the compliance year in which the annual practice was implemented (Part II.B.6.a.(2)); or
    - Land disturbance thresholds lower than Virginia's regulatory requirements for erosion and sediment control and post development stormwater management (Part II.B.6.a.(3)).
- The Town may meet the local TMDL requirements for sediment through BMPs implemented or sediment credits acquired. (Part II.B.6.b).
- The Town shall calculate the anticipated load reduction achieved from each BMP and include the calculations in the action plan required in Part II.B.4.f (Part II.B.6.c).
- No later than 36 months (November 1, 2026) after the effective date of this permit, the Town shall submit to the department an update on the progress made toward achieving Upper Roanoke River Watershed Sediment TMDL Action Plan and Crab Creek Sediment TMDL Action Plan goals and the anticipated end dates by which the Town will meet each wasteload allocation for sediment. The proposed end date may be developed in accordance with Part II.B.3 (Part II.B.6.d).

Necessary documentation for implementation: Sediment Impairment TMDL Action Plan; and (2) Measurable goal documentation, as necessary.

Responsible individual for implementation: Town Manager, Engineering Department, Public Works Dept.

Implementation schedule: Update the Sediment Impairment TMDL Action Plan no later than 18 months after the permit effective date and continue implementation of the action plan.

Measurable goal: Effectiveness will be determined by the consideration of public comments; and the selection of cost effective BMPs supported by model quantification to achieve the required pollutant reductions and outreach strategies to enhance the public's education.

BMP SC2.2 Sediment TMDL Action Plan Implementation (Part II.B.6)

Description: For Local sediment, phosphorous, and nitrogen TMDLs: The Town shall reduce the loads associated with sediment, phosphorus, or nitrogen through implementation of one or more of the following:

- One or more of the BMPs from the Virginia Stormwater BMP Clearinghouse listed in 9VAC25- 870- 65 or other approved BMPs found on the Virginia Stormwater BMP Clearinghouse website;
- One or more BMPs approved by the Chesapeake Bay Program; or
- Land disturbance thresholds lower than Virginia's regulatory requirements for ESC and post development SWM.

The Town shall calculate the anticipated load reduction achieved from each BMP and include the calculations in the action plan required in Part II B 3 f. No later than 36 months (November 1, 2026) after the effective date of this permit, the Town shall submit to the department the anticipated end dates by which the permittee will meet each WLA for sediment, phosphorus, or nitrogen. The proposed end date may be developed in accordance with Part II.B.2.

Necessary documentation for implementation: Sediment Impairment TMDL Action Plan and Program Plan Updates, as necessary.

Responsible individual for implementation: Engineering and Public Works Departments

Implementation schedule: The Sediment Impairment TMDL Action Plan implementation schedule (Table 11) will be updated subsequent to DEQ approval of the updated TMDL Action Plan.

Table 11: Sediment TMDL Action Plan Implementation

Step	General Description	Measurable Goal	Completion Date
1	Sediment Impairment TMDL Action Plan Update	The Town is moving to a targeted approach to inspecting the privately owned stormwater management facilities instead of inspecting them all annually as proposed in the 2015 Sediment Action Plan. Inspections will still meet or exceed the General Permit minimum requirement that all facilities be inspected at least once every five years.	Spring 2020
2	Street Sweeping and/or Storm Drain Cleaning (Crab Creek and Roanoke River)	Re-evaluation and re-structuring (if needed) of the street sweeping and/or storm drain cleaning program with supporting calculations for anticipated load reduction is expected by Fall 2020.	Fall 2020

Step	General Description	Measurable Goal	Completion Date
3	Urban Stream Restoration (Crab Creek)	Completion of sediment reduction calculations to be applied to the MS4 for completed stream restorations at Diamond Hills Park, Blue Leaf, and Towne Branch at Depot Park is expected by December 2020.	December 2020
4	Evaluate BMP Renovations (Roanoke River)	The Town is using the Center for Watershed Protection's spreadsheet-based Watershed Treatment Model to assess the effectiveness of the structural and nonstructural best management practices employed under the Action Plan. Additionally, the spreadsheet will be used to evaluate public and private BMPs installed since the TMDL study to determine sediment reductions associated with those practices. Expected completion June 2021 for evaluation of BMPs already installed with an update at the end of the permit cycle.	June 2021
5	Urban Stream Restoration (Crab Creek)	Recertification of the sediment reduction credit/BMP at Blue Leaf Stream Restoration scheduled for Fall 2021.	Fall 2021
6	Sediment Impairment TMDL Action Plan Update	The Town will address the permit requirement to submit to the department the anticipated end date by which the permittee will meet the WLA for sediment by November 2021.	November 2021
7	BMP Renovations (Roanoke River)	Commencement of installation of BMPs at Lomoor channel and Christiansburg Industrial Park Detention Basin by October 2023.	October 2023

Measurable goal: Effectiveness will be determined by the implementation of the actions in the schedule.

BMP SC3.1 PCB TMDL Action Plan (Part II.B.7)

Description: For each Polychlorinated biphenyl (PCB) TMDL action plan, the Town shall include an inventory of potentially significant sources of PCBs owned or operated by the Town that drains to the MS4 that includes the following information (Part II.B.7.a):

- Location of the potential source (Part II.B.7.a.(1));
- Whether or not the potential source is from current site activities or activities previously conducted at the site that have been terminated (i.e., legacy activities) (Part II.B.7.a.(2)); and
- A description of any measures being implemented or to be implemented to prevent exposure to stormwater and the discharge of PCBs from the site (Part II.B.7.a.(3)).

If at any time during the term of this permit, the Town discovers a previously unidentified significant source of PCBs within the Town's MS4 regulated service area, the Town shall notify DEQ in writing within 30 days of discovery (Part II.B.7.b).

As part of its annual reporting requirements, the Town shall submit results of any action plan PCB monitoring or product testing conducted and any adaptive management strategies that have been incorporated into the updated action plan based upon monitoring or product testing results if the Town has elected to perform monitoring or product testing or both (Part II.B.7.c).

Necessary documentation for implementation: PCB Impairment TMDL Action Plan

Responsible individual for implementation: Engineering Department

Implementation schedule: Update the PCB Impairment TMDL Action Plan for wasteload allocations approved prior to July 1, 2018, no later than 18 months after the permit effective date and continue implementation of the action plan. Add any new PCB wasteload allocations approved after July 1, 2018, and prior to October 31, 2023, within 30 months (May 1, 2026).

Measurable goal: Effectiveness will be determined by the consideration of public comments; and the selection of cost effective BMPs supported by model quantification to achieve the required pollutant reductions and outreach strategies to enhance the public's education.

BMP SC3.2 PCB TMDL Action Plan Implementation (Part II.B.7)

Description: The Town will implement the steps per the schedule in the PCB TMDL Action Plan.

Necessary documentation for implementation: PCB TMDL Action Plan

Responsible individual for implementation: Engineering Department

Implementation schedule: The PCB TMDL Action Plan implementation schedule (Table 12) will be updated subsequent to DEQ approval of the updated TMDL Action Plan.

Table 12: PCB Impairment TMDL Action Plan Implementation

Step	General Description	Measurable Goal	Completion Date
1	Public Outreach Above MS4 Program Plan	A yearly outreach effort beyond that detailed in the MS4 program plan to educate Town residents and business about PCB sources and elimination will be initiated.	yearly
2	Public Outreach Above MS4 Program Plan	Montgomery Regional Solid Waste Authority (MRSWA) will be contacted for any updates to their Household Hazardous Waste collection and outreach efforts.	yearly
3	MS4 Good Housekeeping/IDDE Training	The required staff Good Housekeeping/IDDE training currently contains information on local TMDLs, although not specifically PCBs. PCBs will be added in the 2020 training. As listed in the 2016 PCB Action Plan, some staff training will be occurring more frequently than the biennial frequency required by the MS4 General Permit.	6/2020
4	PCB Source Investigations	The properties identified in the 2016 Action Plan as being within the Town limits, owned by the Town, and within the Roanoke River watershed, plus other properties that may have been acquired since then that meet the same criteria, will be investigated for significant sources of the Pollutant of Concern.	2023-2028 permit cycle
5	Town Public Works Wastewater Treatment Plant (WWTP) Survey	Revision of the industrial waste survey of significant dischargers that is sent to new significant dischargers and to all significant dischargers at the next VPDES permit cycle is complete. Review Significant Industrial Users (SIUs) and any relevant discharger's Standard Industrial (SIC) Codes to evaluate potential sources of PCBs. When the WWTP conducts their next survey, results will be evaluated for potential sources of PCBs in the Roanoke River Watershed	2022

Measurable goal: Effectiveness will be determined by the implementation of the actions in the schedule.

3.3 Ecosystem Restoration Projects

Description: Inspection and maintenance of ecosystem restoration projects used for TMDL compliance (Part II.C).

Within 36 months (November 1, 2026) of permit issuance the Town shall develop and maintain written inspection and maintenance procedures in order to ensure adequate long-term operation and maintenance of ecosystem restoration projects as defined in 9VAC25-890-1 and implemented as part of a TMDL action plan developed in accordance with Part II A, B, or both. The Town may utilize inspection and maintenance protocols developed by the Chesapeake Bay Program or inspection and maintenance plans developed in accordance with the department's Stormwater Local Assistance Fund (SLAF) guidelines (Part II.C.1).

The Town shall inspect ecosystem restoration projects owned or operated by the Town and implemented as part of a current TMDL action plan developed in accordance with Part II.A or Part II.B no less than once every 60 months (Part II.C.2).

Necessary documentation for implementation: (1) Post Construction Stormwater Management Inspection and Maintenance Manual

Responsible individual for implementation: Engineering Department, Public Works

Implementation schedule: The Post Construction Stormwater Management Inspection and Maintenance Manual will be updated within 36 months (November 1, 2026).

Measurable goal: Effectiveness will be measured by the update of the Post Construction Stormwater Management Inspection and Maintenance Manual.

3.4 DEQ BMP Warehouse Reporting

Description: No later than October 1 of each year the Town shall electronically report new BMPs implemented and inspected as applicable between July 1 and June 30 of each year using the DEQ BMP Warehouse (Part III.B).

The Town shall use the associated reporting template for stormwater management facilities not reported in accordance with Part III.B.5, including stormwater management facilities installed to control post-development stormwater runoff from land disturbing activities less than one acre in accordance with the Chesapeake Bay Preservation Area Designation and Management Regulations (9VAC25-830), if applicable, and for which a General VPDES Permit for Discharges of Stormwater from Construction Activities was not required (Part III.B.1).

The Town shall use the DEQ BMP Warehouse to report BMPs that were not reported in accordance with Part III.B.1 or B.5 and were implemented as part of a TMDL action plan to achieve nitrogen, phosphorus, and total suspended solids reductions in accordance with Part II.A or B (Part III.B.2);

The Town shall use the DEQ BMP Warehouse to report:

- any BMPs that were not reported in accordance with Part III.B.1, B.2, or B.5 (Part III.B.3).
- the most recent inspection date for BMPs in accordance with Part I.E.5.b or 5.c, or in accordance with Part II.C and the most recent associated TMDL action plan (Part III.B.4).

The Town shall use the DEQ Construction Stormwater Database or other application as specified by the department to report each stormwater management facility installed after July 1, 2014, to address the control of post-construction runoff from land disturbing activities for which the permittee is required to obtain a General VPDES Permit for Discharges of Stormwater from Construction Activities.

The following information for each new BMP reported in accordance with Part III.B.1, B.2, B.3, or B.5 shall be reported to the DEQ BMP Warehouse as applicable (Part III.C):

- The BMP type (Part III.C.1);
- The BMPs location as decimal degree latitude and longitude (Part III.C.2);
- The acres treated by the BMP, including total acres and impervious acres (Part III.C.3);
- The date the BMP was brought online (MM/YYYY). If the date brought online is not known, the Town shall use 06/2005 (Part III.C.4);
- The 6th Order Hydrologic Unit Code in which the BMP is located (Part III.C.5);
- Whether the BMP is owned or operated by the Town or privately owned (Part III.C.6);
- Whether or not the BMP is part of the Town's Chesapeake Bay TMDL action plan required in Part II.A or local TMDL action plan required in Part II B, or both (Part III.C.7);
- If the BMP is privately owned, whether a maintenance agreement exists (Part III.C.8);
- The date of the Town’s most recent inspection of the BMP (Part III.C.9); and
- Any other information specific to the BMP type required by the DEQ BMP Warehouse (e.g., linear feet of stream restoration) (Part III.C.1).

No later than October 1 of each year, the Town shall electronically report the most recent inspection date for any existing BMP that was previously reported and re-inspected between July 1 and June 30 using the BMP Warehouse. If an existing BMP has not been previously reported, the BMP shall be reported as new in accordance with Part III.B and Part III.C (Part III.D).

No later than October 1 of each year the DEQ BMP Warehouse shall be updated if an existing BMP is discovered between July 1 and June 30 that was not previously reported to the DEQ BMP Warehouse (Part III.E).

Necessary documentation for implementation: (1) SWM Facility Tracking Database

Responsible individual for implementation: Engineering Department

Implementation schedule: No later than October 1 of each year, the Town shall electronically report the most recent inspection date for any existing BMP that was previously reported and re-inspected between July 1 and June 30 using the BMP Warehouse.

Measurable goal: Effectiveness will be measured by the annually reported information by October 1 each year.