



Municipal Separate Storm Sewer System Annual Report

Parham Campus

1651 East Parham Road, Richmond, VA 23228

Reporting Period: July 1, 2020 to June 30, 2021

Prepared for:

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General Permit No. VAR040107

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

Date: October 1, 2021

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Annual Report Certification

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

Printed Name: Amelia M. Bradshaw

Signature: _____

Title: Vice President Finance & Administration

Date: 9/30/2021

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Background and Purpose

J. Sargeant Reynolds Community College (Reynolds) owns and operates a municipal separate storm sewer system (MS4). The Reynolds MS4 consists of features such as curb and gutter, drop inlets, ditches and stormwater management facilities to convey, treat, and ultimately discharge stormwater runoff to surface waters. The discharge of runoff from the MS4 is regulated under the Clean Water Act, as amended and pursuant to the State Water Control Law and Regulations adopted pursuant thereto. Reynolds is authorized to discharge stormwater runoff from the Parham Road campus’s MS4s under the Virginia Stormwater Management Program Regulations, Virginia Pollutant Discharge Elimination System Regulations (VPDES) and the Virginia State Water Control Law.

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

Table 1. General information required for annual reporting.

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

Compliance Summary

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

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

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

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

Minimum Control Measure Annual Reporting

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

MCM 1: Public Education and Outreach

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

BMP 1A – Public Education & Outreach Plan

Annual reporting associated with this BMP requires:

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

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

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

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

Results from Public Survey		
<i>Initial baseline surveys: (1) Focused on material for WQ issues # 1 & #2 intended to be distributed to all of the Reynolds public. (2) Focused on WQ issue #3 distributed to applicable staff. Note the public survey has not yet been distributed as the college considers potential alternatives to assess the effectiveness of the program. However, materials effectively reached the public via mass email.</i>		
Date Distributed: <i>(1) N/A and (2) 9/23/21</i>	Number of Respondents: <i>(1) N/A and (2) 5</i>	Average Score: <i>(1) N/A and (2) 86%</i>

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

MCM 2: Public Involvement and Participation

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

BMP 2A – Dedicated MS4 Webpage

Annual reporting associated with this BMP requires:

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

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

Dedicated Stormwater Webpage Reporting	
Link to current MS4 Program and Stormwater pollution prevention webpage: http://reynolds.edu/who_we_are/about/environmental_sustainability/ms4.aspx	
An annual review of the website conducted to ensure all information required to be posted on the website has continued to be maintained?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Description of updates implemented during the reporting year: <i>Reynolds updated the following documents on the webpage: (1) Updated MS4 Program Plan; updated VCCS Annual Standards and Specifications for ESC and SWM; and (3) Updated Staff Handbook for Pollution Prevention and Good housekeeping. Reynolds also updated webpage language for consistency with the permit to include (1) additional information about illicit discharges, (2) improper disposal and spills; (3) informational discussion regarding pollution from land disturbance activities; (4) hotline information for reporting illicit discharges; and (5) an overview discussion of the MS4 Program Plan and solicitation for input.</i>	
Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

Annual reporting associated with this BMP requires:

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

Illicit Discharge Reports¹		
Number of instances: <i>0</i>	Number of instances closed: <i>0</i>	Percent of instances closed: <i>N/A</i>
Were 100% of instances of illicit discharge reports closed?		<i>N/A</i>
Public Input on Program Plan²		
Number of instances: <i>0</i>	Number of responses: <i>0</i>	Percent of instances responded to: <i>N/A</i>
Was a response provided to all instance of public input?		<i>N/A</i>

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

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

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

BMP 2C – Public Involvement/Participation Activities

Annual reporting associated with this BMP requires:

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

Public Involvement/Participation Activities			
Involvement Type¹	Description of activity²	Report on the Metric to measure benefit to water quality	Beneficial to Improving water quality?
<i>Educational Events</i>	<i>Staff participation on environmental committees that incorporate potential to improve stormwater quality</i>	<i>Grounds/maintenance Committee – Topic Stormwater Management Procedures to protect water quality.</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>Pollution prevention</i>	<i>Install/maintain cigarette butt stations with stormwater message displayed on them.</i>	<i>± six stations at three locations</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>Pollution prevention</i>	<i>Implementation and maintenance of storm drain marker program.</i>	<i>A minimum of 20% of markers inspected and maintained annually.</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>Pollution prevention</i>	<i>Pet waste stations, installation and maintenance</i>	<i>Two stations maintained on campus.</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

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

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

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

MCM 3: Illicit Discharge Detection and Elimination

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

BMP 3A – Maintain MS4 Map and Information Table

Annual reporting associated with this BMP requires:

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

Certification Statement: MS4 Map & Information Table Updates	
<p><i>“In accordance with the General Permit and the Reynolds Program Plan, Reynolds confirms as part of this annual report that the MS4 map and information table have been updated to reflect any changes to the MS4 occurring during the reporting year.”</i></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
<p>Does the measure of BMP effectiveness require Program Plan modification?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

BMP 3B – Prohibition of Unauthorized Non-stormwater Discharges

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

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

Illicit Discharge Prohibition Enforcement		
(If applicable, instances are added below of illicit discharges purposefully caused by the Reynolds Public)		
No. <input type="text" value="Add Instance"/>	Disciplinary action taken? (Yes / No)	Description of action taken
Total number of instances for current reporting year.		0
Total number of instances for last reporting year.		0
Total number of instances two years previous.		0
Total number of instances three year prior.		<i>N/A – previous permit cycle</i>
Does trend indicate the BMP is ineffective?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

Annual reporting associated with this BMP requires:

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

Outfall Screening & IDDE Procedure Effectiveness	
Total number of outfalls screened as part of dry weather screening program.	<i>10</i>
Total number of Reynolds outfalls.	<i>10</i>
Were 100% of outfalls screened during the reporting year?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

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

MCM 4: Construction Site Stormwater Runoff Control

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

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

Annual reporting associated with this BMP requires:

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

Certification Statement: Adherence to the VCCS Standards & Specifications for ESC	
Confirmation Statement: <i>“In accordance with the General Permit and the Reynolds Program Plan, Reynolds confirms that land disturbing projects that occurred during the reporting period have been conducted in accordance with the latest DEQ-approved standards and specifications for Erosion and Sediment Control.”</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

ESC Inspections & Enforcement Summary	
Total number of ESC inspections conducted: 2 (<i>small 3-week SWM retrofit project</i>)	
Were any enforcement actions taken during the reporting year?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

Annual reporting associated with this BMP requires:

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

Illicit Discharge from Land Disturbance Activity	
Were there any instances during the reporting period of illicit discharges originating from land disturbance activity?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

MCM 5: Post-construction SWM for Development

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

BMP 5A – Address Post-construction Stormwater Runoff

Annual reporting associated with this BMP requires:

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

Certification Statement: Adherence to the VCCS Standards & Specifications for SWM	
Confirmation Statement: <i>“In accordance with the General Permit and the Reynolds Program Plan, Reynolds confirms that land disturbing projects that occurred during the reporting period have been conducted in accordance with the latest DEQ-approved Standards and Specifications for Stormwater Management.”</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

Annual reporting associated with this BMP requires:

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

SWM Facility Inspections and Maintenance	
Total number of inspections conducted on SWM facilities for the reporting year is: 7	
Was at least one inspection performed on each Reynolds SWM facility?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Was any significant maintenance, repair, or retrofit activities necessary as a result?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>If Yes, provide the BMP ID and a description of the significant maintenance including an assessment of the timeliness of the needed actions.</p> <ul style="list-style-type: none"> ✓ <i>BMP #3: The pond is understood to be a dry pond; but holds water. Investigation is needed with review of design plans and modifications likely to meet the design intent.</i> ✓ <i>BMP #4: Investigation is needed with review of design plans to ensure intended function of pond (i.e. wet forebay and control structure design)</i> ✓ <i>BMP #5: (1) Areas within the facility are not well drained and a low-flow orifice is intentionally plugged. Assumed these areas should be dry within a day or two after rainfall, also allowing for vegetation in the basin to be easily maintained. However, Investigation is needed with review of design plans and potential modifications to meet the design intent. (2) Remove woody vegetation at toe of embankment.</i> ✓ <i>BMP #6: The facility holds water, which is assumed not to be the intent. As a result, there is a lack of vegetation. Review plans to determine intent and make modifications to ensure proper function. (2) Standing water in forebay due to improper function of forebay berm. Replace berm per plans or alternative to allow passage of stormwater. (3) Remove leafy debris at low-flow orifice.</i> <p><i>Necessary maintenance will be performed in fall 2021 and/or spring 2022.</i></p>	

BMP 5C – Maintain SWM Facilities Spreadsheet

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

BMP 5D –SWM Facilities Reporting to DEQ

Annual reporting associated with this BMP requires:

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

Certification Statement: Report to Virginia Construction Stormwater General Permit Database (Applicable for Reporting Year)	
<p>Confirmation Statement: <i>“Reynolds submitted SWM facility information through the Virginia Construction Stormwater General Permit database for those land disturbing activities for which coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities was required in accordance with the VCCS Standards and Specifications for ESC and SWM.”</i></p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</p>

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

**Certification Statement: Report to Virginia Construction Stormwater General Permit Database
 (Not Applicable for Reporting Year)**

Confirmation Statement: “Reynolds either did not complete any projects during the reporting period requiring coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities; or, if a project was completed, a stormwater management facility was not installed as part of the project.”	Marked box below is confirmation <input checked="" type="checkbox"/>
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Certification Statement: Reporting to the DEQ BMP Warehouse

Confirmation Statement: “ <i>Reynolds reported, prior to submission of this annual report, new stormwater management facilities and BMPs implemented between July 1 and June 30 of the reporting period using the DEQ BMP Warehouse that were installed to control post-development stormwater runoff from land disturbing activities less than one acre in accordance with the Chesapeake Bay Preservation Act regulations (9VAC25-830) and for which a General VPDES Permit for Discharges of Stormwater from Construction Activities was not required.</i> ”	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
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If no, information will be submitted by: *During the reporting period, Reynolds designed and constructed the “J. Sargeant Reynolds Lot L & M Stormwater Retrofit” project at the East Parham Road campus. This project has been completed and included installation of a stormwater retrofit measure in the form of a Contech Jellyfish Stormwater Filter unit at an existing parking area. Reynolds will be reporting the SWM facility to the BMP Warehouse prior to 10/31/21.*

Summary of BMP Effectiveness based on Program Plan Measurable Goal

Does the measure of BMP effectiveness require Program Plan modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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MCM 6: Pollution Prevention & Good Housekeeping for Facilities

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

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

Annual reporting associated with this BMP requires:

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

Effectiveness of Program to Prevent Illicit Discharges from Campus Operations	
Were there any illicit discharges from BMP 3C reporting that originated from campus operations of maintenance activities?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

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

Annual Campus SWPPP Assessment Results	
Was an annual evaluation performed to determine if a SWPPP is required?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, is a SWPPP required?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

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

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

Nutrient Management	
Did Reynolds apply nutrients during the reporting year?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p><i>Reynolds implements a Nutrient Management Plan that applies to the Reynolds MS4 regulated Parham Road campus and covers 5.61 acres of turf (2.23 acres for athletic fields and 3.38 acres on campus). The Nutrient Management Plan is approved by the Department of Conservation and Recreation and was valid through December 14, 2020. Reynolds currently has an updated plan being developed at time of submittal of this annual report.</i></p>	

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

Annual reporting for this BMP requires:

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

BMP 6A Annual Reporting Form	
Were there any illicit discharges during the reporting period that originated from contractor activities?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

BMP 6E – Training Plan for Applicable Employees

Annual reporting associated with this BMP requires:

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

Good Housekeeping/Pollution Prevention Training	
Date of latest training event:	<i>June 29, 2020 (Virtual)</i>
Number of employees that attended the latest training event.	<i>18</i>
Number of employees identified to be required to participate in training (as defined by the general permit and program plan).	<i>18</i>
Percent of those identified that attended training.	<i>100%</i>
Did the % of those identified to be required to attend training attend?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Description of the objective of the latest training event: <i>Familiarize staff with Stormwater Management Standard Operating Procedures and explain their importance for protecting water quality.</i>	
Average quiz score from latest training event.	<i>N/A</i>

Summary of BMP Effectiveness based on Program Plan Measurable Goal	
Does the measure of BMP effectiveness require Program Plan modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Special Conditions for Total Maximum Daily Load Waste Load Allocations

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

BMP SC1 – Chesapeake Bay TMDL Action Plan

Annual reporting associated with this BMP requires the following:

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

Chesapeake Bay TMDL Action Plan Annual Reporting				
<p><i>During the reporting period, Reynolds designed and constructed the “J. Sargeant Reynolds Lot L & M Stormwater Retrofit” project at the East Parham Road campus. This project has been completed and included installation of a stormwater retrofit measure in the form of a Contech Jellyfish Stormwater Filter unit at an existing parking area. The plans were reviewed and approved consistent with the VCCS Standards and Specifications for ESC and SWM. Pollutant reduction credits, as demonstrated with the approved plans and summarized below, are as follows:</i></p> <ul style="list-style-type: none"> ✓ <i>TP Reduction = 1.15 lbs./yr.</i> ✓ <i>TN reductions = 5.74 lbs./yr.</i> ✓ <i>TSS reductions = 502.3 lbs./yr.</i> <p><i>As described in the Reynolds Chesapeake Bay TMDL Action Plan, additional reductions will be achieved prior to the 2023 target from stream restoration being performed on campus in association with Henrico County. Reynolds is anticipated to receive the following additional credits upon completion of the stream restoration project:</i></p> <ul style="list-style-type: none"> ✓ <i>TP Reduction = 10 lbs./yr.</i> ✓ <i>TN reductions = 35 lbs./yr.</i> ✓ <i>TSS reductions = 3,600 lbs./yr.</i> 				
Pollutant	Reductions Required by 2023 (lbs./yr.)	Reductions from existing SWM facilities (lbs./yr.) (2013-2018 Action Plan)	Reductions from SWM Retrofit 2021 (lbs./yr.)	Total reductions 2020-2021 (lbs./yr.)
TN	12.0	<i>None identified</i>	<i>5.74</i>	<i>5.74</i>
TP	3.2	<i>None identified</i>	<i>1.15</i>	<i>1.15</i>
TSS	1,415	<i>None identified</i>	<i>502.3</i>	<i>502.3</i>
Are reductions progressing to achieve targets?				<i>Yes</i>
Were any modifications made to the action plan?				<i>No</i>

BMP SC2 – Action Plan for the Chickahominy River and Tributaries Bacteria TMDL

Annual reporting associated with this BMP requires annually providing a status report on the implementation of the Action Plan with a summary of actions conducted during the reporting period to implement the action plan, provided below:

Action Plan for the Chickahominy River and Tributaries Bacteria TMDL - Status Report	
<i>In accordance with Part II.B.4.b of the MS4 General Permit (Permit), Reynolds selected at least one strategy listed in Table 5 of the Permit to reduce the load of bacteria to the MS4 relevant to sources of bacteria applicable within the MS4 regulated service area. Consistent with the potential sources listed in the Action Plan, Reynolds maintains signage and two disposal pet waste containers/stations on campus. These stations were maintained throughout the reporting period.</i>	
Is the Action plan being implemented?	<i>Yes</i>
Were any modifications made to the action plan?	<i>No</i>