

**Municipal Separate Storm Sewer System (MS4)**

**VPDES General Permit No. VAR040039**

**Annual Report for the Reporting Period  
July 1, 2024 - June 30, 2025**



**WILLIAM & MARY**

CHARTERED 1693

***September 30, 2025***

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## William &amp; Mary – 2025 MS4 Annual Report

**1. SIGNED CERTIFICATION (PART IV K-2):**

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.

DocuSigned by:

A handwritten signature in black ink, enclosed in a blue rectangular border. The signature reads "Marc Kelly".

73A1F88D0DE7421...

9/24/2025 | 14:40:36 EDT

Responsible Official Signature

Date

**Marc Kelly**

Director of Facilities Operations

VAR040039

Permit Number

William & Mary

MS4 Name

**2. INTRODUCTION**

William & Mary (W&M) was originally issued an MS4 permit in 2003 by the Commonwealth of Virginia. This permit sets forth minimum requirements for the operation of W&M's storm sewer system, including storm water treatment systems, and is reissued every five years. The University's current permit number is VAR040039, and the current permit cycle duration is from November 1, 2023, to October 31, 2028. The permit mandates an annual report to be submitted to Virginia DEQ by October 1<sup>st</sup> during the permit cycle, detailing progress in meeting permit requirements from July 1<sup>st</sup> to June 30<sup>th</sup> of the previous year. This annual report encompasses W&M's progress in meeting the permit requirements for the period from July 1, 2024, to June 30, 2025.

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### **3. ANNUAL REPORTING REQUIREMENTS (PART I D.)**

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

*Part I D. Annual Reporting Requirements.*

- 1. The permittee shall submit an annual report to the department no later than October 1 of each year in a method, (i.e., how the permittee must submit) and format (i.e., how the report shall be laid out) 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.*

**Response: Acknowledged! W&M submits MS4 annual reports to DEQ no later than October 1 of each year in a method and format acceptable to DEQ and in accordance with the General Permit requirements. This annual report specifically covers the period from July 1, 2024, to June 30, 2025.**

- 2. 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.*

**Response: We acknowledge the regulatory requirements as outlined in 9VAC25-31-1020, which mandates the electronic submission of annual reports following notification from the department. In compliance with this regulation, we understand that all forms and reports submitted after the department's specified start date must be submitted electronically. Additionally, W&M has already commenced electronic submission of all documents related to MS4, including the annual reports.**

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

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

**Response: The permittee and system name are William & Mary, and the Permit number is VAR040039. This information is also included on the cover sheet of the annual reports.**

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

**Response: This annual report covers the period from July 1, 2024, to June 30, 2025. This information is also noted on the cover page of this report.**

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

**Response: The signed certification, as required by Part IV K, has been provided on Section 1 on page 1 above.**

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

**Response: Please refer to section 4 on page 4 below for each annual reporting item as specified in an MCM in Part I E.**

e) *An evaluation of the MS4 program implementation, including a review of each MCM, to determine the MS4 program's effectiveness and whether or not changes to the MS4 program plan are necessary.*

**Response: The MS4 program implementation, including a review of each MCM, was evaluated during this reporting period and found to be effective and functioning as intended. Based on this evaluation, no modifications to the MS4 Program Plan were deemed necessary.**

4. *For permittees receiving initial coverage under this general VPDES permit for the discharge of stormwater, the annual report shall include a status update on each component of the MS4 program plan being developed. Once the MS4 program plan has been updated to include*

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*implementation of a specific MCM in Part I E, the permittee shall follow the reporting requirements established in Part I D 3..*

**Response: W&M did not receive initial coverage under this general VPDES permit. In fact, W&M has held permit number VAR040039 since 2003. W&M's annual report adheres to the reporting requirements outlined in Part I D 3.**

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

**Response: This annual report includes a status report on the implementation of the local TMDL action plan in accordance with Part II B of this permit. Please refer to Section 5.0 on page 19 of this annual report for the local TMDL action plan status report.**

6. *For the purposes of this permit, the MS4 program plan, annual reports, the Chesapeake Bay TMDL action plan, and Chesapeake Bay TMDL implementation annual status reports shall be maintained as separate documents and submitted to the department as required by this permit as separate documents.*

**Response: Understood! The MS4 program plan, annual reports, Chesapeake Bay TMDL action plan, and Chesapeake Bay TMDL implementation annual status reports are maintained and submitted to the department as separate documents.**

## 4. MINIMUM CONTROL MEASURES REPORTING (PART I E.)

### 4.1 Public Education and Outreach

The Public Education and Outreach Program at W&M seeks to alert residents, students, faculty, and staff on the impacts of stormwater runoff on water quality through various communication channels. It provides guidance on how the community can help in minimizing adverse impacts of urban runoff in waterways. W&M utilizes existing programs, organizations, boards, and committees within the community to implement public education activities. The Public Education and Outreach program at W&M uses existing forums and outreach materials established by EPA,

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local, and adjacent MS4 jurisdictions. These materials are widely distributed by the University's staff members at various events and meetings.

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

*Part I section E-1-g: The annual report shall include the following information:*

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

**Response: The high-priority stormwater issues identified and addressed during this reporting period by W&M are:**

- **Nutrient Management**
- **Erosion Control**
- **Plastics Diversions**

2. *A summary of the public education and outreach activities conducted for the report year, including the strategies used to communicate the identified high-priority issues;*

**Response: The permit requires two or more of the following strategies per year to communicate to the target audience the high-priority stormwater issues identified above: traditional written materials, alternative materials, signage, media materials, speaking engagements, curriculum materials, training materials, public education activities, and public meetings.**

**Below is a summary of the public education and outreach activities conducted for the report year including the strategies used to communicate the above identified high-priority issues at W&M.**

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High-Priority Stormwater Issue	Public Education and Outreach Activities	Strategies Used	Target Audience	% of Target Audience Reached	Documentation
Nutrients Management (Includes water chemistry)	Staff Training	Training Materials	Grounds supervisors – 4 staff	100% of staff trained	Training records available upon request
Erosion Control	ESC Briefings prior to start of Construction	Speaking Engagements and Training Materials	Contractors	100% of Contractor representatives for construction projects over 2,500 sf land disturbance	Approved Erosion & Sediment Control Plans available upon request. ESC inspection reports available upon request.
Plastics Diversion	Seminar	Training Materials and Signage	Students – 8,500 Faculty & staff – 3,900	100% of students, faculty, and staff	Campus-wide recycling containers and events (1)
Stormwater and Waste Management	Seminar	Training Materials	Faculty & Students	35 attendees	Campus wide program management.

3. A description of any changes in high-priority stormwater issues, including strategies used to communicate high-priority stormwater issues or target audiences for the public education and outreach plan. The permittee shall provide a rationale for any of these changes; and

**Response: There have been no changes in high-priority stormwater issues, strategies, or target audience during the reporting period, as the above-mentioned issues have most directly impacted stormwater quality at the University and have been effectively addressed by actions of W&M's students, faculty, and staff.**

**The MCM is effective in ensuring regulatory compliance. Also, no changes are planned currently.**

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4. *A description of public education and outreach activities conducted that included education regarding climate change.*

**Response: There has not been direct education specifically regarding climate change, but the activities mentioned above have tangible impacts on climate change by reducing nutrient runoff to lower greenhouse gas emissions, implementing erosion control to preserve carbon-sequestering soils, and diverting plastics to reduce emissions from waste.**

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

### **4.2 Public Involvement and Participation**

W&M encourages residents and students to participate in volunteer programs about water resources. Educational workshops and materials, offered by W&M, also provide information to the public about stormwater management practices implemented on campus and different sustainable practices that can help restore and protect surface waters. W&M Facilities Operations has developed a website dedicated to water quality and stormwater management [Stormwater Management | Facilities Operations | William & Mary](#). The site provides information on W&M's MS4 program, serves as a forum to distribute educational materials, and includes information on where to report potential illicit discharges. It provides water quality and pollution prevention information to the public in an easily accessible format. It also provides public access to documents such as W&M's MS4 program plan, annual reports, and TMDL action plans.

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

*Part I section E-2-i. The annual report shall include the following information:*

1. *A summary of any public comments on the MS4 program received and how the permittee responded;*

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**Response: No public comments on MS4 program were received during this reporting period.**

2. *A summary of stormwater pollution complaints received under the procedures established in Part I E 2 a (1), excluding natural flooding complaints, and how the permittee responded;*

**Response: The University had five new illicit discharge events in the fiscal year 2025 (FY25). The total pollution remediation cost to the university for the FY25 illicit discharge events was \$151,118.94. A description of each event and its associated cost can be found in Attachment A. If you have any questions regarding these events or need additional information, you may contact Teresa Belback, Director of Environmental Health and Safety at 757-221-2146 or [tbelback@wm.edu](mailto:tbelback@wm.edu).**

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

**Response: Effective MS4 permit and coverage letter, annual reports, current MS4 program plan, Chesapeake Bay TMDL action plan, local TMDL action plan, Chesapeake Bay TMDL implementation annual status reports, a mechanism for the public to report illicit discharge and improper disposal, a method for how the public can provide comments on MS4 program plan, and other MS4 and stormwater documents are posted to the following link: [Stormwater Management | Facilities Operations | William & Mary](#).**

4. *Federal and state nontraditional permittees with security policies preventing the MS4 program and stormwater pollution prevention webpage from being publicly accessible utilizing an internal staff accessible website, such as intranet, shall provide evidence of the current internal MS4 program and stormwater pollution prevention webpage;*

**Response: This requirement is not applicable to W&M because it is a public institution. The MS4 program and stormwater pollution prevention webpage is publicly accessible and does not require an internal staff-accessible website for security reasons.**

5. *A description of the public involvement activities implemented by the permittee, including any efforts to reach out and engage all economic and ethnic groups;*

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**Response: The permit requires W&M to implement no less than four activities per year from two or more of the following opportunities listed in Table 2 of the general permit:**

**Monitoring, restoration, public educational activities, public meetings, disposal or collection events, and pollution prevention. The University conducted the following public involvement activities during this reporting period.**

**Monitoring**

- Keck Environmental Lab provided quarterly sampling of water quality from streams, ponds, and tidal creeks in the College Creek watershed, including College Creek, Tinkling Rill, and Lake Matoaka.
- Earth Week Activities, April 16 - 22, 2025
- Students conducted field lab exercises in the three stormwater ponds as part of Watershed Dynamics Course

**Disposal or Collection Events**

- Campus Race to Zero Waste Annual Tournament, includes electronics recycling.
- Hazardous Waste Pickup, for waste generated by University operations, and ongoing program, picks up periodically.
- Universal Waste Pickup, for waste generated by University operations, an ongoing program, pick up periodically.
- Recycling Program, manages collection from recycling and compost containers throughout campus, includes paper, cardboard, plastics #1-7, aluminum, steel, glass, milk & juice cartons. Dedicated locations are established for small electronics, ink cartridges, plastic bags, batteries, and light bulbs. Refer to the following W&M's MS4 webpage for more information on the public involvement activities: [Stormwater Management | Facilities Operations | William & Mary](#).

6. *A description of public education and outreach activities conducted that also included education regarding climate change;*

**Response: There has not been direct public education and outreach activities specifically regarding climate change, but the activities mentioned above have tangible impacts on climate change by reducing waste, recycling more, and the environmental impact of stormwater management.**

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

**Response:** For each public involvement activity, W&M keeps track of participant engagement through numbers of participants compared to the total numbers of students, staff, and faculty. It is estimated that these activities have reached more than 90% of the University community. While the activities cannot be linked to a measurable improvement in water quality on campus, the University community is more aware of stormwater issues than in the past. W&M-Facilities Operations continues to receive positive feedback from participants at these activities and will continue to investigate additional opportunities to increase public participation.

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

**Response:** No other MS4 permittees were involved in the listed public involvement opportunities during this reporting period.

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

### 4.3 Illicit discharge detection and elimination

In order to detect and eliminate both direct and indirect illicit discharges, W&M has established Illicit Discharge Detection and Elimination Program (IDDE), which relies on W&M's [Illicit Discharge Detection and Elimination Policy](#) (directive #762) to prohibit any non-stormwater discharges into the sewer system or any receiving waterway. The policy is enforced by the W&M Facilities Operations Department, who relies strongly on regular inspections and public notification. W&M encourages the community's contribution in discovering and reporting possible polluted runoff and maintains appropriate staffing to address such reported concerns. Instructions on how to report concerns or potential illicit discharges are available online at the W&M [Stormwater Management | Facilities Operations | William & Mary](#).

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W&M maintains stormwater system maps and publishes interactive stormwater maps using online GIS. The complete MS4 maps with outfall information table are available upon request. W&M performs dry weather screening (outfall reconnaissance) once a year on the outfalls to identify possible illicit connections and discharges, as well as to keep track of all existing stormwater management facilities and structures within the MS4 boundary. During the outfall reconnaissance, outfalls are evaluated for structural damages or uncommon conditions that might indicate the present of pollutants. In addition, outfalls are inspected for maintenance necessity to avoid detrimental conditions on stream banks and bed.

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

*Part I section E-3-e. The annual report shall include:*

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

**Response: W&M's stormwater system maps and information table have been updated to reflect the current site condition including any changes to the MS4 occurring on or before June 30 of this year. A link to MS4 maps and information tables can be found here: [MS4 WM \(arcgis.com\)](http://MS4 WM (arcgis.com)).**

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

**Response: During this reporting period, W&M's inspectors screened all the University's outfalls and observation points as part of the annual dry weather screening program (outfall predominance) and no illicit discharges were identified during the inspection. There is a total of 55 outfalls in the University's MS4 service area. The inspection reports can be provided upon request.**

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3. *A list of illicit discharges to the MS4, including spills reaching the MS4 with information as follows:*
  - a. *The location and source of illicit discharge;*
  - b. *The dates that the discharge was observed, reported, or both;*
  - c. *Whether the discharge was discovered by the permittee during dry weather screening, reported by the public, or other method (describe);*
  - d. *How the investigation was resolved;*
  - e. *A description of any follow-up activities; and*
  - f. *The date the investigation was closed.*

**Response:** The University had five new illicit discharge events in the fiscal year 2025 (FY25). The total pollution remediation cost to the university for the FY25 illicit discharge events was \$151,118.94. A description of each event and its associated cost can be found in Attachment A. If you have any questions regarding these events or need additional information, you may contact Teresa Belback, Director of Environmental Health and Safety at 757-221-2146 or [tblback@wm.edu](mailto:tblback@wm.edu).

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

### 4.4 Construction Site Stormwater Runoff and Erosion & Sediment Control

W&M has developed Annual Standards and Specifications for Erosion and Sediment Control and Stormwater Management (AS&S) in accordance with the Virginia Erosion and Stormwater Management law and regulations. It is an integral component of all design, construction, maintenance, and management of W&M's facilities and campus. It is enforced during the planning, design, permitting, and construction phases by W&M – Facilities Operation & Maintenance, and Facilities Planning, Design & Construction staff. W&M personnel receive training by DEQ on ESC and SWM, to enforce such programs. Certified staff and/or certified consultants are responsible for reviewing plans during the permitting process and conducting regular inspections on project sites during construction. Plan review and inspection procedures are implemented in accordance with state laws and regulations and W&M's AS&S.

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W&M implements 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.

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

*Part I Section E-4-e. The annual report shall include the following:*

1. *Total number of erosion and sediment control inspections conducted;*

**Response: At a minimum, according to W&M Standards and Specifications, inspections of erosion and sediment control measures during construction must be conducted at the start of the project, at least every two weeks, within 48 hours of a significant rainfall event, and at the completion of the project. However, W&M inspector conducts daily E&S inspections at active construction sites. The inspector prepares a report every other week, resulting in 24 reports per reporting period. Reports are available upon request.**

2. *Total number of each type of compliance action and enforcement action implemented; and*

**Response: As the University is the contract holder for all the land disturbance activities on campus and the ESC inspector represents the University, any deficiencies in ESC measures or practices are resolved immediately during construction as noted and identified by the inspector. There were no compliance and enforcement actions implemented during the reporting period.**

3. *For nontraditional permittees:*

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

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**Response: All land disturbing projects that occurred during this reporting period have been conducted in accordance with the University's current department approved Annual Standards and Specifications for erosion and sediment control and for stormwater management.**

b. *If any land disturbing projects were conducted without department approved annual standards and specifications, a list of all land disturbing projects that occurred during the reporting period with erosion and sediment control plan approval dates for each project.*

**Response: Not applicable, see response above.**

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

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

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

Part I section E-5-e. The annual report shall include the following information:

1. *If the traditional permittee implements a VSMP in accordance with Part I E 5 a (1), (2), or (3):*
  - a. *The number of privately owned stormwater management facility inspections conducted; and*
  - b. *The number of enforcement actions initiated by the permittee to ensure long-term maintenance of privately owned stormwater management facilities including the type of enforcement action;*

**Response: W&M is a public institution of higher education and a non-traditional permittee. The University has developed standards and specifications in accordance with Virginia Erosion and Stormwater Management Laws and Regulations. Part I E 5 a**

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**(3) is applicable to W&M. As a public institution, there are no privately owned stormwater management facilities (SMFs) within W&M MS4 service area to inspect, report, and enforce actions. All SMFs are owned, operated, inspected, and maintained by W&M's Department of Facilities Operations and no enforcement actions were initiated by W&M staff.**

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

**Response: All stormwater management facilities were inspected during the reporting period in accordance with the University's S&S, BMP operation, inspection and maintenance manual, and inspection checklists. There are a total of 37 stormwater management facilities and BMPs in MS4 service area. W&M will prepare a prioritized plan to address the deficiencies identified during this reporting period in the next year's period.**

3. *A description of the significant maintenance, repair, or retrofit activities performed on the stormwater management facilities owned or operated by the permittee to ensure it continues to perform as designed. This does not include routine activities such as grass mowing or trash collection;*

**Response: During this reporting period, there were no significant maintenance, repair, or retrofit activities performed on the stormwater management facilities owned or operated by W&M. Routine activities, such as grass mowing and trash collection, were conducted as needed to maintain the facilities, but no major interventions were necessary to ensure their continued performance as designed.**

4. *For traditional permittees as specified in Part I E 5 a (1), a confirmation statement that the permittee submitted stormwater management facility information through the Virginia Construction Stormwater General Permit database for those land disturbing activities for which the permittee was required to obtain coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities in accordance with Part III B 1 or a*

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*statement that the permittee did not complete any projects requiring coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities (9VAC25-880);*

**Response: As stated above under question 1, W&M is a public institution of higher education and a non-traditional permittee. W&M has submitted all SWM facilities information to DEQ for those projects that required VPDES Permit. Therefore, this question is not applicable to W&M.**

5. *A confirmation statement that the permittee electronically reported stormwater management facilities using the DEQ BMP Warehouse in accordance with Part III B 1 and 2; and*

**Response: New underground detention systems were constructed as part of the new dorms and dining project; however, these are not water quality systems and therefore are not reported to DEQ through BMP Warehouse. All previously installed water quality BMPs have already been reported.**

6. *A confirmation statement that the permittee electronically reported stormwater management facilities inspected using the DEQ BMP Warehouse in accordance with Part III B 5.*

**Response: This is not applicable to W&M because W&M is not a traditional permittee. Part III B 5 is for traditional permittees to use DEQ Construction Stormwater Database to report each SMF installed after July 1, 2014.**

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

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

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

Part I section E-6-y. The annual report shall include the following:

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

**Response: W&M's written operational procedures consist of the "BMP Operation and Maintenance Manual" and "Directive 763 - Pollution Prevention/Good Housekeeping Procedures to Protect the Stormwater System". No new procedures were developed, and no changes or modifications were made to the operational procedures during the reporting period. The operational procedures are included as appendices in W&M's MS4 program plan.**

2. *A confirmation statement that all high-priority facilities were reviewed to determine if SWPPP coverage is needed during the reporting period;*

**Response: All facilities at W&M were reviewed during this reporting period to determine if a SWPPP coverage is needed. The University does not have any facilities that meet the permit criteria for high-priority facilities.**

3. *A list of any new SWPPPs developed in accordance with Part I E 6 i during the reporting period.*

**Response: No new SWPPPs have been developed during the reporting period.**

4. *A summary of any SWPPPs modified in accordance with Part I E 6 j, 6 l, or 6 m;*

**Response: No SWPPP was developed or modified during the reporting period. There is no high-priority facility on the University campus.**

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5. *The rationale of any high-priority facilities delisted in accordance with Part I E 6 l or m during the reporting period;*

**Response: No high-priority facility was delisted during the reporting period, as there was originally no high-priority facility listed.**

6. *The status of each nutrient management plan as of June 30 of the reporting year (e.g., approved, submitted and pending approval, and expired);*

**Response: The current approved nutrient management plan is valid and will expire on 7/1/2027.**

7. *A list of the training activities conducted in accordance with Part I E 6 d, including the following information:*

- a. *The completion date for the training activity;*
- b. *The number of employees who completed the training activity; and*
- c. *The objectives and good housekeeping procedures covered by the training activity.*

**Response: Below is a summary of the training activities, including all required information:**

<b>Training Activity</b>	<b>The completion date for the training activity</b>	<b>The number of employees who completed the training activity</b>	<b>The objectives and good housekeeping procedures covered by the training activity</b>
Online Continuing Education for Nutrient Management Planner License	8/5/2022	1	Nutrient Management License Update (every 2 years)
Recertification class for 3B Pesticide Classification	6/30/2023	1	Pesticide Recertification (every 2 years)

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Monthly Crew Meetings	Monthly	All grounds crew	good housekeeping and illicit discharge prevention and response training
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**MCM Evaluation: The MCM is effective in ensuring regulatory compliance. No changes are planned at this time.**

## 5. PART II – TMDL SPECIAL CONDITIONS

### A. CHESAPEAKE BAY TMDL SPECIAL CONDITION

As per Part I D 6., Chesapeake Bay TMDL Implementation Annual Status Report *is maintained as a separate document from this Annual Report and is submitted to the department as a separate document.*

### B. LOCAL TMDL SPECIAL CONDITION

In Part II section B 11. of the MS4 permit, the permit lists specific items to be addressed in the Annual Report. The following are the items listed in the permit in *italic* typeface followed by responses in **bold** typeface:

Part II section B 7 c.

c. As part of its annual reporting requirements, the permittee 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 permittee has elected to perform monitoring or product testing or both.

**Response: Monitoring and testing are not required, and no monitoring is currently being conducted as part of TMDL compliance. No monitoring or product testing was performed during this reporting period. Therefore, no results of PCB monitoring or product testing are available, and no adaptive management strategies have been incorporated into the local TMDL action plan.**

## William & Mary – 2025 MS4 Annual Report

### Part II section B 11.

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

### **Bacterial TMDLs, local sediment, phosphorus, and nitrogen TMDLs, PCB TMDLs, and Chloride TMDLs for Powhatan Creek and Mill Creek**

W&M updated its local TMDL Action Plan during this reporting period (May 1, 2025). The University is continuing its existing efforts as documented in the local TMDL Action Plan. Ongoing observations at the Dillard Complex indicate that the measures have been successful in preventing the deposition of pet waste. Continue to protect the riparian buffer along the north side of the Dillard Complex by not mowing or removing vegetation. Enforce the existing policy of no pets on the athletic fields.

## **6. PART IV - CONDITIONS APPLICABLE TO ALL STATE AND VPDES PERMITS**

### **6.1 C. Reporting Monitoring Results**

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

### Part IV C.1.

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

**Response: No monitoring was performed during the reporting period, so there are no results to submit.**

## William & Mary – 2025 MS4 Annual Report

### **6.2 I. Reports of noncompliance**

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

#### Part IV section I. 1.

*1. The operator shall report any noncompliance that may adversely affect surface waters or may endanger public health.*

**Response: N/A, there was no noncompliance during this reporting period that may adversely affect surface waters or may endanger public health.**

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

**Response: There were no instances of noncompliance to report during this reporting period. In addition, W&M is in the process of implementing additional staff training to improve compliance with Part I E 6. See Section 4 starting on page 4 of this Report.**

*3. The immediate (within 24 hours) reports required in Part IV G, H, and I shall be made to the department. Reports may be made by telephone, email, or online at <https://www.deq.virginia.gov/our-programs/pollution-response/pollution-data-and-reporting>. For reports outside normal working hours, the online portal shall be used. For emergencies, call the Virginia Department of Emergency Management's Emergency Operations Center (24-hours) at 1-800-468-8892.*

**Response: Acknowledged! DEQ was notified of the incidents that occurred and noted on the report dated 7/29/2025.**

## William & Mary – 2025 MS4 Annual Report

*4. Where the operator becomes aware of a failure to submit any relevant facts, or submittal of incorrect information in any report, including a registrations statement, to the department, the operator shall promptly submit such facts or correct information.*

**Response: Acknowledged!**

### **6.3 K. Signatory requirements**

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

#### Part IV K. 2.

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

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

**Response: This annual report has been signed by Director of Facilities Operations. See Section 1 on page 1 of this report.**



**WILLIAM & MARY**  
CHARTERED 1693

**Environmental Health & Safety Office**  
**P.O. Box 8795**  
**Williamsburg, VA 23187-8795**  
**757.221.2146 office**

July 29, 2025

Sherree Walker  
Director of Financial Reporting  
William & Mary

RE: Pollution Remediation Obligations per GASB Statement No. 49 for FY25

In response to your request, the University had five new illicit discharge events in the fiscal year 2025 (FY25). The total pollution remediation cost to the university for the FY25 illicit discharge events was **\$151,118.94**. No funds were recovered from insurance or other sources.

A description of each event and its associated cost can be found in Attachment A. If you have any questions regarding these events or need additional information, you may contact me at 221-2146 or [tblback@wm.edu](mailto:tblback@wm.edu)

Sincerely,

A handwritten signature in black ink that reads "Teresa Belback".

Teresa Belback, Director  
Environmental Health & Safety Office

Cc: Sean Hughes, Associate Vice President Business Affairs

Attachment A: W&M FY25 Illicit Discharge Report

**ATTACHMENT A**  
**William & Mary FY25 Illicit Discharge Report**  
**July 1, 2024 – June 30, 2025**

**1. West Woods 1 Sewage Leak – DEQ # 317820 – Work Order 401424**

On March 4, 2025, a sewage leak was identified within the construction fence of the West Woods One project. It was caused by a blockage in the sewage system, not caused by construction. It was estimated that no more than 5,000 gallons of sewage entered the Health Center BMP (best management practice stormwater feature). It did create a fish kill. The BMP drains to Tinkling Rill stream, which discharges to Lake Matoaka. Costs incurred were associated with pumping contaminated water from the BMP and clearing the blockage. No further remediation was required. No insurance claim was filed for this incident.

Description	Cost
Facilities Management Labor	\$ 525.00
Maintenance Contract	\$ 2,435.00
<b>Grand Total</b>	<b>\$2,960.00</b>

**2. Facilities Management Paint Spill - DEQ #317171 – Work Order N/A**

On January 31, 2025, a student, serving community service hours, cleaned painting tools and equipment in a wash area for Grounds. The wastewater entered a storm drain connected to an oil-water separator. The impacted stormwater system discharges to outfall MC\_0810 to Pollard Park which discharges to College Creek. The contaminated water in the oil-water separator was pumped out. No further remediation was required. No charges were incurred. No insurance claim was filed for this incident.

**3. Hunt Hall Sediment Laden Untreated Closed Hot Water Loop – DEQ #316101 – Work Order 393318 and 393496**

On October 21, 2024, corrosion caused hot water piping, which supports the closed loop heating system, to break. The area had to be excavated and pumped out, causing approximately 1,000 gallons of sediment laden water to enter a storm drain at outfall MC\_0810 at Pollard Park that discharges to College Creek. There were no known chemicals in the water as it was not being treated. The outfall was pumped to remove sediment from the spill and crews cleaned the stormwater gutters in the surrounding area. No further remediation was required for this event. No insurance claim was filed for this incident.

Description	Cost
Facilities Management Labor	\$ 6,346.50
Materials	\$ 47.75
Maintenance Contract (pending charges)	\$76,600.05
<b>Grand Total</b>	<b>\$82,994.30</b>

**4. Commons Tennis Court Sediment Laden Potable Water – DEQ #315503 – Work Order N/A**

On September 11, 2024, potable water with sediment was flowing from a backfilled excavation area. The cause was previous excavation work supporting the West Woods 1 construction project. A water main was damaged. Approximately 75,000 gallons of water and sediment flowed from the construction site down Ukrop Way and Wake Drive to stormwater drain outfall MC\_0610 near Randolph Complex and DuPont Hall. This outfall discharges to Tinkling Rill Creek which leads to Lake Matoaka. Vacuum trucks were used to remove sediment from roadways and sediment socks were placed at storm drains. No further remediation was required. There was no cost to the University for this remediation. No insurance claim was filed for this incident.

**5. Landrum Pump Station Sewage Spill – DEQ #315295 – Work Order 388028**

On August 26, 2024, an electrical failure caused the Landrum Pump Station to fail. A bypass pump was utilized to manage the flow until repairs could be made. On August 28, 2024, the bypass pump failed causing a second overflow from the lift station. A total of approximately 11,000 gallons of sewage entered the Wildflower BMP from both events. This BMP leads to Tinkling Rill Creek which leads to Lake Matoaka. Impacts of the sewage spill resulted in recreational activities being suspended in Lake Matoaka from August 29 – September 4, 2024. All actions were coordinated with the Virginia Department of Environmental Quality and Virginia Department of Health. The impacted Wildflower BMP was pumped out and dead fish were removed. No further remediation was required. Corrective action included replacing failed equipment, reconfiguring electrical supply in the pump station, changing grading outside of pump station to contain potential spills, installing a new alarm system, and monitoring water quality until Lake Matoaka could be reopened for recreational use. No further remediation was required. An insurance claim was filed for this incident.

<b>Description</b>	<b>Cost</b>
Facilities Management Labor	\$ 4,950.00
Materials	\$ 31.64
Maintenance Contract	\$60,183.00
<b>Grand Total</b>	<b>\$65,164.64</b>



**WILLIAM  
& MARY**

CHARTERED 1693

**ENVIRONMENTAL HEALTH  
& SAFETY OFFICE**

**DEQ "Five Day Letter"  
Format**

**A. Responsible Party Name, Address, Telephone #:**

College of William & Mary  
ATTN: Teresa Belback, Director, Environmental Health and Safety  
P.O. Box 8795  
Williamsburg, VA 23187-8795  
757-221-2146

**B. Incident Response (IR) Number: # 315295**

**C. Spill Information**

**1. Spill Date & Time:**

- EH&S was notified of a sewage-like odor impacting the Wildflower BMP on 8/26/24 at 9:17AM. Facilities Management believes the spill began at approximately 5:30AM on 8/26/24.
- A second spill occurred 8/28/24 at 6PM due to a failed bypass pump.

**2. Type of Product Released:** Sewage

**Cause of the Release:** On 8/26/24, an electrical failure in the electrical panel prevented the lift station pumps from operating allowing sewage to build up in the station and release to the Wildflower BMP. The dialer failed due to a tripped breaker caused by a contractor's extension cord overheating preventing the lift station from notifying Facilities Management when the lift station went into alarm. In addition to the dialer, the tripped breaker controls a portion of the pump controller which impacted the power supply to both pumps in the lift station. The lift station had preventative maintenance performed at 9:30AM on Friday, 8/23/24, and the station was functioning normally. Facilities Management did not receive complaints of sewage odors and believes the release occurred during the early morning hours of 8/26/24, when the contractor began their shift. EH&S was contacted by Randy Chambers, the Director of the Keck Environmental Field Lab, regarding a sewage-like odor around the Wildflower BMP at 9:17AM on Monday, 8/26/24. Randy's notification prompted the discovery of the spill.

The Wildflower BMP discharges to a small creek, Tinkling Rill, that discharges to Ice House Cove in Lake Matoka. EH&S observed a fish kill in the Wildflower BMP on 8/26/24.

As part of the repair measures, a bypass pump was installed on 8/27/24, to support one of the lift station pumps that was operating at a reduced capacity due to a partial repair as parts were still pending. At 6PM on 8/28/24, the bypass pump failed, causing the second overflow from the lift station.

**3. Specific Location of Spill with Map:** 421 Landrum Drive, Williamsburg, VA 23185



**4. Volume of Product Released:**

- On 8/26/24, it is estimated 8,400 gallons of sewage was discharged from the lift station to the Wildflower BMP.
- On 8/28/24, it is estimated that 2,600 gallons of sewage was discharged from the lift station to the Wildflower BMP.

**5. Volume of Product Reaching State Waters, Including Storm Drain Systems:** It is estimated 11,000 gallons of sewage entered the Wildflower BMP as a result of both spills.

**6. Name of waterway that Spill Discharged Into:** Lake Matoaka

**7. Description of Clean-Up and Disposal Measures Performed:**

On 8/26/24, contractors pumped the lift station to maintain levels until temporary repairs could be completed to allow the lift station to function. Vacuum trucks were emptied at the Graduate Housing lift station. Contractors pumped the BMP to remove dead fish and to remove contaminated water from the upper section of the BMP while the lift station was out of service. The Keck Environmental Field Lab was informed of the findings related to the spill and determined sampling was not necessary based on the extent of the spill.

On 8/27/24 at approximately 11:10AM, Facilities Management and the contractor completed repairs which enabled one lift station pump to operate at partial capacity. A bypass pump was temporarily installed that pumped to the sanitary system to assist the lift station until additional parts were received complete repairs for the lift station to operate at full capacity. EH&S visually evaluated the Wildflower BMP and Tinkling Rill creek that leads to Lake Matoaka. Conditions remained the same in the BMP as rainfall did not occur and discoloration of the water in Tinkling Rill was minimal. A fish kill was not observed in Tinkling Rill.

On 8/28/24, at 6PM the bypass pump failed creating a second sewage spill. Contractors responded and repaired the pump that evening. Spilled material around the lift station was pumped into the sanitary system. Crews monitored the pump overnight to respond to additional failures. EH&S was informed of the second spill on 8/29/24.

On 8/29/24, the malfunctioning bypass pump was replaced. FM employees performed around-the-clock evaluations on the replaced bypass pump to monitor the equipment. EH&S evaluated the conditions of the Wildflower BMP and observed a black discoloration to the water, EH&S also observed a black discoloration in Tinkling Rill. The discoloration was not observed in Ice House Cove, where Tinkling Rill enters Lake Matoaka. The Keck Environmental Field Lab was informed of the second spill and the changes of the water condition in the Wildflower BMP and Tinkling Rill. Randy Chambers, with the Keck Environmental Field Lab, observed dying clams in Tinkling Rill and performed fecal coliform sampling. Randy informed EH&S of his findings and recommended closing Lake Matoaka to recreational activities as a precautionary measure based on his observations as sampling results were pending. The closing of Lake Matoaka was communicated to the City of Williamsburg Public Work Engineer, Williamsburg Fire Department Chief, the DEQ and VDH. A notification was sent to the William & Mary campus community and signage regarding the lake closure was placed at recreational areas that access the lake.

On 8/30/24, at 2:30PM Facilities informed EH&S that repairs were completed at the lift station and both pumps were put in service, at full capacity. The dialer was repaired, and it was verified that when the station will notify Work Control when water levels are elevated.

**8. Name of Agencies Notified or On Scene:**

- Notified Aaron Small, Williamsburg Public Works Engineer on 8/26/24 and 8/29/24
- Notified Larry Snyder, Williamsburg Fire Department Chief on 8/26/24 and 8/29/24

- Notified VA DEQ on 8/26/24 and 8/29/24
- Notified VDH on 8/29/24

#### **9. Corrective Actions Taken to Prevent Future Spill Incidents:**

- Facilities Management completed repairs to the lift station on 8/30/24. Both pumps are operating at full capacity. The bypass pump will temporarily stay on-site to ensure immediate response if any issues arise with the lift station.
- Facilities Management is evaluating the current dialer to upgrade the system. The current dialer will notify Work Control when levels are elevated in the lift station. An audible alarm has been installed that will sound at the lift station. The William & Mary Police Department has been made aware of the audible alarm.
- The electrical outlet outside the lift station has been labeled and locked to prevent unauthorized use of the outlet.
- Facilities Management is evaluating the condition of the land surrounding the lift station to make improvements to contain sewage spills and prevent sewage from entering the Wildflower BMP and improvements that can be made to the BMP.
- The Keck Environmental Field Lab will periodically sample areas downstream of the Wildflower BMP to Lake Matoaka to evaluate fecal coliform levels. Lake Matoaka will be reopened for recreational use when levels are acceptable for swimmable/fishable waters and in agreement with VDH.

#### **Photos:**



Conditions of the Wildflower  
BMP on 8/27/24 at 9:34AM.



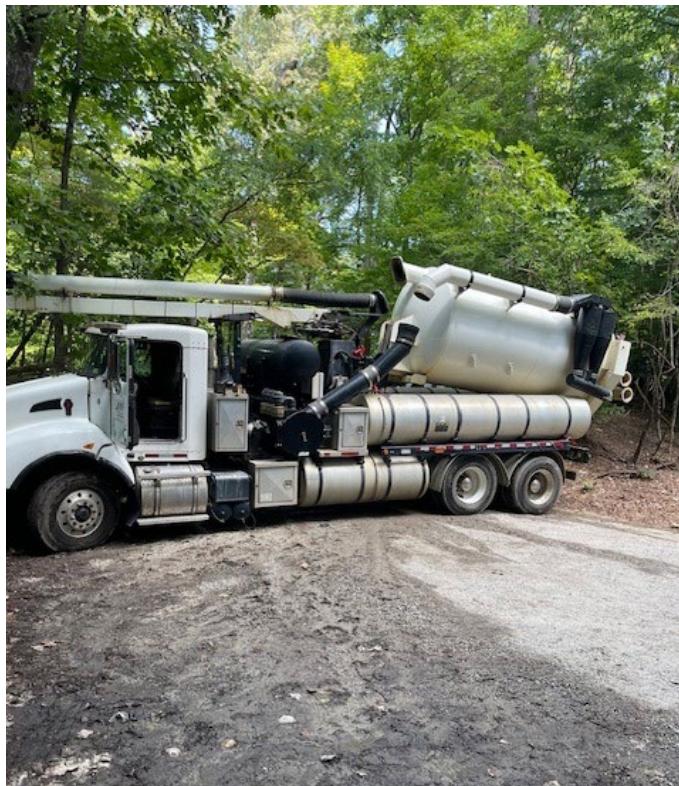
Conditions of the Wildflower  
BMP on 8/29/24 at 8:30AM.







Fish kill observed in the Wildflower BMP on 8/26/24 at 10:03AM.



Vacuum truck in position to perform pumping operations at the BMP. Photo taken on 8/26/24.



Temporary bypass pump in place to assist the lift station until repairs are completed. Photo taken on 8/27/24

The image below shows conditions after the spill that occurred during the evening on 8/28/24. The area outlined in yellow shows the area impacted by the second sewage spill. Image was taken on 8/29/24 at 10:00AM



**Submittal method:**

**Mail to:** Virginia Department of Environmental Quality  
Attn: PReP Coordinator  
5636 Southern Boulevard  
Virginia Beach, VA 23462  
(757) 518-2179

**Fax to:** (757) 518-2003

**Email:** troprep@deq.virginia.gov