

**MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4)**

**VPDES GENERAL PERMIT NO. VAR040039**

**ANNUAL REPORT FOR THE REPORTING PERIOD  
JULY 1, 2023 - JUNE 30, 2024**

**THE COLLEGE OF WILLIAM & MARY**



***September 30, 2024***

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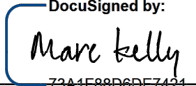
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## 1. SIGNED CERTIFICATION (PART IV K-2):

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.

	8/7/2025   14:53:08 EDT
Responsible Official Signature	Date
<b>Marc D. Kelly</b> Executive Director of Facilities Operations	

<u>VAR040039</u> Permit Number	<u>The College of William &amp; Mary</u> MS4 Name
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## 2. INTRODUCTION

The College of William & Mary (CWM) was originally issued an MS4 permit in 2003 by the Commonwealth of Virginia. This permit sets forth minimum requirements for the operation of CWM's storm sewer system, including storm water treatment systems, and is reissued every five years. The College'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 CWM's progress in meeting the permit requirements for the period from July 1, 2023, to June 30, 2024.

### 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! CWM 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, 2023, to June 30, 2024.**

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, CWM has already commenced electronic submission of all documents related to MS4, including annual reports.**

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

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

**Response: The permittee and system name: The Collage of William & Mary**

**Permit number: VAR040039**

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

**Response: This annual report covers the period from July 1, 2023, to June 30, 2024. 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 current permit required that MS4 program plan shall be updated within 6 months of effective date which was 11/1/2023. Therefore, the MS4 program implementation, including a review of each MCM, was evaluated during this reporting period to determine the MS4 program's effectiveness. As a result, the MS4 program plan was revised and updated during the reporting period, effective July 1, 2024.**

- 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*

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

**Response: CWM does not receive initial coverage under this general VPDES permit. In fact, CWM has held permit number VAR040039 since 2003. CWM'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 20 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 CWM 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. CWM utilizes existing programs, organizations, boards, and

committees within the community to implement public education activities. The Public Education and Outreach program at CWM uses existing forums and outreach materials established by EPA, local, and adjacent MS4 jurisdictions. These materials are widely distributed by the College'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 CWM 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**

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- **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 CWM.

<b>High-Priority Stormwater Issue</b>	<b>Public Education and Outreach Activities</b>	<b>Strategies Used</b>	<b>Target Audience</b>	<b>% of Target Audience Reached</b>	<b>Documentation</b>
Nutrients Management (Includes water chemistry)	Staff Training	Training Materials	Grounds supervisors and Turf Mgmt. Staff -15 personnel	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	Seminars	Training Materials and Signage	Students – 8,500 Faculty & staff – 3,900	100% of students, faculty, and staff	Campus-wide recycling containers and events (1)



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 College and have been effectively addressed by actions of CWM's students, faculty, and staff.**

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

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**

CWM encourages residents and students to participate in volunteer programs about water resources. Educational workshops and materials, offered by CWM, 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. CWM Facilities Management has developed a website dedicated to water quality and stormwater management [Stormwater Management | William & Mary \(wm.edu\)](https://wm.edu/stormwater). The site provides information on CWM'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 CWM'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;*

**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: No stormwater pollution complaints, including illicit discharges, improper disposal, spills to the MS4, complaints regarding land disturbance activities or other potential stormwater pollution concerns, were received during this reporting period.**

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 | William & Mary \(wm.edu\)](https://wm.edu/stormwater)

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 CWM because it is a public institution. The MS4 program and stormwater pollution prevention webpage is publicly accessible and do 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;*

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

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

#### **Monitoring**

- **Keck Environmental Lab provided quarterly sampling of water quality from 24 streams, ponds, and tidal creeks in the College Creek watershed, including College Creek, Tinkling Rill, and Lake Matoaka**
- **Earth Week Activities, April 16 - 22, 2024**
- **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 college facilities, ongoing program, picks up daily.**

- **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 CWM's MS4 webpage for more information on the public involvement activities:**

[Stormwater Management | William & Mary \(wm.edu\)](https://wm.edu/stormwater-management)

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 environment impact of stormwater management.**

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, CWM 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 College community. While the activities cannot be linked to a measurable improvement in water quality on campus, the College community is more aware of stormwater issues than in the past. CWM-Facilities Management 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.**

**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, CWM has established Illicit Discharge Detection and Elimination Program (IDDE), which relies on CWM'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 CWM Facilities Management Department, who relies strongly on regular inspections and public notification. CWM 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 CWM [Stormwater Management website](#).

CWM maintains stormwater system maps and publishes interactive stormwater maps using online GIS. The complete MS4 maps with outfall information table are available upon request. CWM 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: CWM'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 reporting year. A link to MS4 maps and information tables can be found here: [MS4 WM \(arcgis.com\)](https://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, CWM's inspectors, screened all the College'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 are a total of 55 outfalls in the College's MS4 service area.**

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: During the reporting period, there were no illicit discharge events where prohibited discharges reached the storm sewer system.**

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

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

CWM has developed Annual Standards and Specifications for Erosion and Sediment Control and Stormwater Management (AS&S) in accordance with the Virginia Erosion and Sediment Control law and regulations, and Virginia Stormwater Management program. It is an integral component of all design, construction, maintenance, and management of CWM's facilities and campus. It is enforced during the planning, permitting, and construction phases by CWM – Facilities Management, Operation & Maintenance, and Facilities Planning, Design & Construction staff. CWM 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 CWM's AS&S.

CWM 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: Inspections of erosion and sediment control measures and stormwater management facilities (SMFs) during construction are conducted at least every two weeks, within 48 hours of a significant rainfall event, and at the completion of the project, in accordance with CWM's most recent DEQ approved Standards and Specifications. During this reporting period, the total number of erosion and sediment control inspections conducted by CWM's ESC Inspector was 72.**

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

**Response: As the College is the contract holder for all the land disturbance activities on campus and the ESC inspector represents the College, any deficiencies in ESC measures or practices are resolved immediately. 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*

**Response: All land disturbing projects that occurred during this reporting period have been conducted in accordance with the College'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: CWM is a public institution of higher education and a nontraditional permittee. The College has developed standards and specifications in accordance with Virginia Erosion and Sediment Control and Stormwater Management Laws and Regulations. Part I E 5 a (3) is applicable to CWM. As a public institution, there are no privately owned stormwater management facilities (SMFs) within CWM MS4 service area to inspect, report, and enforce actions. All SMFs are owned, operated, inspected, and maintained by CWM's Department of Facilities Management and no enforcement actions was initiated by CWM 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 College'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. CWM 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 CWM. 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 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, CWM is a public institution of higher education and a nontraditional permittee. CWM has submitted all SWM facilities information to DEQ for those projects that required VPDES Permit. Therefore, this question is not applicable to CWM.**

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: No new SMFs were installed during this reporting period to report using the DEQ BMP Warehouse, and all previously installed SMFs/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 CWM because CWM 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.**

#### **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: CWM'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 CWM'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 CWM were reviewed during this reporting period to determine if SWPPP coverage is needed. The College 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 are no high-priority facilities on the college campus.**

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 facilities were delisted during the reporting period, as there were originally no high-priority facilities 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:**

Training Activity	The completion date for the	The number of employees who completed the training activity	The objectives and good housekeeping procedures covered by the training activity

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	training activity		
Online Continuing Education for Nutrient Management Planner License	8/5/2022	1	Nutrient Management License Update
Recertification class for 3B Pesticide Classification	6/30/2023	1	Pesticide Recertification
Recertification class for 60 Pesticide Classification	February 2023	6	Pesticide Recertification
Recertification class for Arborist	12/31/2022	1	Arborist Recertification
ISA Tree Risk Assessment Qualification	6/30/2023	1	Become Qualified as a tree care professional who has specialized knowledge in tree risk assessment
Monthly Crew Meetings	Monthly	All grounds crew	good housekeeping and illicit discharge prevention and response training
ESC and SWM certifications			

**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.**

*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**

**The College 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. CWM plans to update its local TMDL Action Plan during the next reporting period.**

## 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**

### 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, CWM is in the process of implementing additional staff training to improve compliance of Part I E 6. See Section 4 starting on page 4 of this Report.**

*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!**

*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;*



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- 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 Associate VP for Facilities Management / Chief Facilities Officer. See Section 1 on page 1 of this report.**