# Minimum Control Measure No. 1: Public Education and Outreach

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<th>Measurable Goal</th>
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<tr>
<td>1.a. - The permittee shall implement a public education and outreach program designed to</td>
<td>The Rivanna Stormwater Education Partnership (RSEP) was founded in 2003 to provide a regional approach to educating the public about stormwater pollution prevention and stormwater management. UVA will continue to participate in RSEP. RSEP will develop a Public Outreach and Education Plan which will include efforts to increase the public’s awareness of the high priority stormwater issues, list of planned outreach and education programs, the public audience, the strategies to be used for communication, and the anticipated time periods the messages will be communicated or made available to the public. Cost and resource sharing allows RSEP members to participate in a more effective and robust approach to public outreach and education.</td>
<td>RSEP will meet at least 6 times per year and maintain a website with information about stormwater pollution prevention and management. RSEP will continue to provide general education to the public through brochures, ads, etc. Whenever possible, illegal discharge-related messages will be incorporated into greater outreach campaigns.</td>
<td>The RSEP website can be found at <a href="http://rivanna-stormwater.org">http://rivanna-stormwater.org</a>. UVA stormwater website can be found at <a href="https://www.fm.virginia.edu/depts/operations/environmental/stormwater.html">https://www.fm.virginia.edu/depts/operations/environmental/stormwater.html</a>. RSEP’s Outreach and Education Plan is included in Appendix A. Some planned outreach and education efforts may be modified due to COVID-19 restrictions on in-person gatherings issued by the Governor of Virginia and the UVA President. Any such modifications will be noted in the appropriate annual report.</td>
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1.a.(1)-(3) - Increase the public’s knowledge of how to reduce stormwater pollution, placing priority on reducing impacts to impaired waters and other local water pollution concerns; Increase the public’s knowledge of hazards associated with illegal discharges and improper disposal of waste, including pertinent legal implications; and implement a diverse program with strategies that are targeted toward individuals or groups most likely to have significant stormwater impacts.

1.b. - The permittee shall identify no less than three high-priority stormwater issues to meet the goal of educating the public in accordance with Part I E 1.a. High-priority issues may include the following examples: Chesapeake Bay nutrients, pet wastes, local receiving water impairments, TMDLs, high-quality receiving waters, and illicit discharges from commercial sites.

(there are no sub sections to this requirement)

Through RSEP, local entities identified the three high priority water quality issues that are of greatest concern to the local community: runoff volume reductions, potential runoff pollutants, and TMDL impairments as the three high priority stormwater issues. The rationale for choosing these issues is described within the RSEP Outreach and Education Plan. In addition to participation in RSEP campaigns, UVA will undertake efforts to specifically target the University student population.

Number of stormwater education and outreach campaigns undertaken annually which target the identified high priority water quality issues.

Same documentation as described in 1.a.(1)-(3).
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<td>1.c. - The high-priority public education and outreach program, as a whole, shall:</td>
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<td>1.c. (1)-(4) - Clearly identify the high-priority stormwater issues; Explain the importance of the high-priority stormwater issues; Include measures or actions the public can take to minimize the impact of the high-priority stormwater issues; and Provide a contact and telephone number, website, or location where the public can find out more information.</td>
<td>The RSEP Outreach and Education Plan as described in 1.a.(1)-(3) includes a list of planned outreach and education programs, the public audience, the strategies to be used for communication, and the anticipated time periods the messages will be communicated or made available to the public. RSEP and UVA will ensure that the educational and outreach program includes the required information.</td>
<td>Number of educational efforts undertaken annually.</td>
<td>Same documentation as described in 1.a.(1)-(3).</td>
<td>Existing, Ongoing</td>
<td>ER, FM, RSEP</td>
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Table 1 Strategies:
Traditional written materials; Alternative materials; Signage; Media Materials; Speaking engagements; Curriculum materials; Training materials

| 1.d. - The permittee shall use two or more of the strategies listed in Table 1 below per year to communicate to the public the high-priority stormwater issues identified in accordance with Part I E 1b including how to reduce stormwater pollution. | | | | | |
| RSEP’s Outreach and Education Plan (Appendix A) provides specifics on planned strategies to be used. The Plan will be updated during the permit cycle if new strategies are identified. | Utilize two or more strategies annually to communicate high priority stormwater issues either through RSEP or at UVA individually. | Same documentation as described in 1.a.(1)-(3). | Existing, Ongoing | ER, FM, RSEP |

| 1.e. - The permittee may coordinate its public education and outreach efforts with other MS4 permittees; however, each permittee shall be individually responsible for meeting all of its state permit requirements. | | | | | |
| UVA partners with other RSEP members, including Albemarle County and the City of Charlottesville, on its public education and outreach strategy. However, each permittee reports compliance with the permit requirements individually in their annual report. In addition, UVA may undertake additional public outreach and education measures beyond those planned with RSEP. | Compliance with state permit requirements. | Same documentation as described in 1.a.(1)-(3). | Existing, Ongoing | ER, FM, RSEP |
### Minimum Control Measure No. 1: Public Education and Outreach

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<tr>
<td>The MS4 Program Plan is a planning document to aid UVA staff in management of UVA's MS4 program. Revisions to the anticipated BMPs described in this MS4 Program Plan are expected throughout the life of this permit as part of the iterative process to reduce pollutant loading and protect water quality to the maximum extent practical. Each MCM will be reviewed and evaluated annually for effectiveness to determine whether or not changes to the MS4 Program Plan are necessary. Revisions required as a result of the iterative process or through evaluation of program effectiveness will be noted during the annual reporting process and appropriate updates will be made to the MS4 Program Plan. Internal documents, policies, and SOPs referenced in the Program Plan are intended to provide guidance and UVA reserves the right to change these documents at any time and in any manner. The MS4 General Permit requires these documents to be in place and the presence of the documents, not the details of their content, are the enforceable requirement of the permit. Revisions to the MS4 Program Plan or referenced documents will be made within 60 days upon discovery of the need for a change unless otherwise specified in the permit language. All BMPs and strategies are being implemented with consideration for the Chesapeake Bay and Local TMDLs and to support developing action plans to address such TMDLs in accordance with MS4 regulatory requirements. Unless otherwise stated, no monitoring data is collected for the MS4 program. Any documents noted as available upon request may be requested by emailing <a href="mailto:storm-water@virginia.edu">storm-water@virginia.edu</a>.</td>
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A - University Athletics Department  
EHS - UVA Office of Environmental Health and Safety  
ER - UVA Environmental Resources  
FM - UVA Facilities Management  
OUBO - UVA Office of the University Building Official  
PD - UVA Police Department  
RSEP - Rivanna Stormwater Education Partnership
## Minimum Control Measure No. 2: Public Involvement and Participation

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<td>2.a. - The permittee shall develop and implement procedures for the following:</td>
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<td>2.a.1)(5) - The public to report potential illicit discharges, improper disposal, or spills to the MS4, complaints regarding land disturbing activities, or other potential stormwater pollution concerns; The public to provide input on the permittee's MS4 program plan; Receiving public input or complaints; Responding to public input received on the MS4 program plan or complaints; and Maintaining documentation of public input received on the MS4 program and associated MS4 program plan and the permittee's response.</td>
<td>The public can report input on discharges or spills via the RSEP or UVA website. The public can provide input about UVA's MS4 program plan via the UVA website. UVA will maintain records of all public input or complaints received, responses provided, and how the comment was incorporated into the MS4 Program Plan or how the complaint was handled. Input received about the MS4 program will be provided with the appropriate annual report. Reported spills and illicit discharges will be tracked on a separate spreadsheet as described in 3.c.(1).</td>
<td>The public can easily find reporting information on UVA's MS4, illicit discharges or spills on the UVA website. The public can also easily report illicit discharge or spill information via the RSEP website. Both websites are regularly maintained.</td>
<td><a href="http://rivanna-stormwater.org">http://rivanna-stormwater.org</a>.</td>
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<td>ER, FM, RSEP</td>
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<td>2.a. - No later than three months after this permit's effective date, the permittee shall develop and maintain a webpage dedicated to the MS4 program and stormwater pollution prevention. The following information shall be posted on this webpage:</td>
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<td>2.b.1)(5) - The effective MS4 permit and coverage letter; The most current MS4 program plan or location where the MS4 program plan can be obtained; The annual report for each year of the term covered by this permit no later than 30 days after submittal to the department; A mechanism for the public to report potential illicit discharges, improper disposal, or spills to the MS4, complaints regarding land disturbing activities, or other potential stormwater pollution concerns in accordance with Part I E 2 a (1); and Methods for how the public can provide input on the permittee's MS4 program plan in accordance with Part I E 2 a (2).</td>
<td>All required MS4 permit related information, including a mechanism for the public to report environmental concerns, is posted on the FM website. The public can provide comments on UVA's MS4 program plan at any time during the permit cycle at the same website.</td>
<td>Copies of the plan, annual report, and opportunities to provide input are kept up to date and are readily available to the public. Any documents will be posted within 30 days of submittal or completion.</td>
<td><a href="https://www.fm.virginia.edu/depts/operations/environmental/submitconcern.html">https://www.fm.virginia.edu/depts/operations/environmental/submitconcern.html</a></td>
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<td><strong>2.c.</strong> - The permittee shall implement no less than four activities per year from two or more of the categories listed in Table 2 below to provide an opportunity for public involvement to improve water quality and support local restoration and clean-up projects.</td>
<td>As part of the RSEP Education and Outreach plan described in 1.a.(1)-(3), activities have been identified for public involvement. In addition to participation in RSEP campaigns, UVA will undertake efforts to specifically target the University student population via efforts with UVA's Office for Sustainability and the Clean Water Working Group.</td>
<td>Participate in a minimum of four activities annually either through RSEP or as UVA individually.</td>
<td>Same documentation as described in 1.a.(1)-(3).</td>
<td>Existing, Ongoing</td>
<td>ER, FM, RSEP</td>
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**Table 2 Public Involvement Opportunities** - Monitoring, restoration, educational events, disposal or collection events, pollution prevention.

2.d. - The permittee may coordinate the public involvement opportunities listed in Table 2 with other MS4 permittees; however, each permittee shall be individually responsible for meeting all of the permit requirements.

| (there are no sub sections to this requirement) | UVA partners with other RSEP members, including Albemarle County and the City of Charlottesville, on its public involvement and participation efforts. However, each permittee reports compliance with the permit requirements individually in their annual report. In addition, UVA may undertake additional public involvement opportunities beyond those planned with RSEP. | Compliance with state permit requirements. | Same documentation as described in 1.a.(1)-(3). | Existing, Ongoing | ER, FM, RSEP |

### Additional Comments on Public Involvement and Participation

The MS4 Program Plan is a planning document to aid UVA staff in management of UVA's MS4 program. Revisions to the anticipated BMPs described in this MS4 Program Plan are expected throughout the life of this permit as part of the iterative process to reduce pollutant loading and protect water quality to the maximum extent practical. Each MCM will be reviewed and evaluated annually for effectiveness to determine whether or not changes to the MS4 Program Plan are necessary. Revisions required as a result of the iterative process or through evaluation of program effectiveness will be noted during the annual reporting process and appropriate updates will be made to the MS4 Program Plan. Internal documents, policies, and SOPs referenced in the Program Plan are intended to provide guidance and UVA reserves the right to change these documents at any time and in any manner. The MS4 General Permit requires these documents to be in place and the presence of the documents, not the details of their content, are the enforceable requirement of the permit. Revisions to the MS4 Program Plan or referenced documents will be made within 60 days upon discovery of the need for a change unless otherwise specified in the permit language. All BMPs and strategies are being implemented with consideration for the Chesapeake Bay and Local TMDLs and to support developing action plans to address such TMDLs in accordance with MS4 regulatory requirements. Unless otherwise stated, no monitoring data is collected for the MS4 program. Any documents noted as available upon request may be requested by emailing storm-water@virginia.edu.

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### Minimum Control Measure No. 3: Illicit Discharge Detection and Elimination

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<tr>
<td>3.a. The permittee shall develop and maintain an accurate MS4 map and information table as follows:</td>
<td>GIS technology is used to accurately map all stormwater discharge outfall locations and associated required information. All stormwater outfalls or points of discharge have been identified for annual inspection and illicit discharge tracking. Maps are updated as outfall locations change due to construction projects. The map will be maintained and updated as soon as possible after changes occur but no later than October 1 of each year for changes occurring through June 30 of that same year.</td>
<td>Accurate, up-to-date inventory of UVA's storm sewer system, including all outfalls and points of discharge.</td>
<td>A GIS map and associated information table is stored on a secure UVA site and may be made available upon request.</td>
<td>Existing, Ongoing</td>
<td>ER, FM</td>
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<td>3.a.(2) - The permittee shall maintain an information table associated with the storm sewer system map that includes the following information for each outfall or point of discharge for those cases in which the permittee elects to map the known point of discharge in accordance with Part I E 3 a (1) (a): (a) A unique identifier as specified on the storm sewer system map; (b) The latitude and longitude of the outfall or point of discharge; (c) The estimated regulated acreage draining to the outfall or point of discharge; (d) The name of the receiving water; (e) The 6th Order Hydrologic Unit Code of the receiving water; (f) An indication as to whether the receiving water is listed as impaired in the Virginia 2016 305(b)/303(d) Water Quality Assessment Integrated Report; (g) The predominant land use for each outfall discharging to an impaired water; and (h) The name of any EPA approved TMDLs for which the permittee is assigned a waste load allocation.</td>
<td>UVA will continue to utilize GIS technology to accurately map all stormwater discharge outfall locations and associated required information. New information that was not previously required, such as predominant land use, will be added during this permit cycle. The information table will be maintained and updated as changes occur.</td>
<td>Accurate, up-to-date inventory of UVA’s storm sewer system.</td>
<td>Same map and information table as described in 3.a.(1).</td>
<td>Existing, Ongoing</td>
<td>ER, FM</td>
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<td>3.a.(3) - No later than July 1, 2019, the permittee shall submit to DEQ a GIS-compatible shape file of the permittee’s MS4 map as described in Part I E 3 a. If the permittee does not have an MS4 map in a GIS format, the permittee shall provide the map as a PDF document.</td>
<td>As described in 3.a(1)-(2), UVA maintains an accurate GIS map and associated information table with information about UVA’s storm sewer system and outfalls. This shape file will be shared with DEQ by the stated deadline.</td>
<td>Submittal of GIS shape file of UVA’s MS4 map to DEQ by the specified deadline.</td>
<td>Same map and information table as described in 3.a.(1).</td>
<td>Existing, Ongoing</td>
<td>ER, FM</td>
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<td>3.a.(4) - No later than October 1 of each year, the permittee shall update the storm sewer system map and outfall information table to include any new outfalls constructed or TMDLs approved or both during the immediate preceding reporting period.</td>
<td>As described in 3.a(1)-(2), UVA maintains an accurate GIS map and associated information table with information about UVA’s storm sewer system and outfalls. These are updated as changes are made but, at minimum, will be updated no later than October 1 annually.</td>
<td>Accurate, up-to-date inventory of UVA’s storm sewer system, updated by the specified deadline.</td>
<td>Same map and information table as described in 3.a.(1).</td>
<td>Existing, Ongoing</td>
<td>ER, FM</td>
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### Minimum Control Measure No. 3: Illicit Discharge Detection and Elimination

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<td>3.a.(5) - The permittee shall provide written notification to any downstream adjacent MS4 of any known physical interconnection established or discovered after the effective date of this permit.</td>
<td>UVA has provided written notification to the City of Charlottesville regarding physical interconnections to their MS4. Letters were also sent to Albemarle County and VDOT, though no physical interconnections have been identified to date. UVA will continue to maintain an up-to-date GIS map to identify any physical interconnections that may be made in the future.</td>
<td>Neighboring MS4s are informed of physical interconnections with UVA.</td>
<td>Copies of the written notification letters are available upon request.</td>
<td>Existing, Ongoing</td>
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<td>3.b. - The permittee shall prohibit, through ordinance, policy, standard operating procedures, or other legal mechanism, to the extent allowable under federal, state, or local law, regulations, or ordinances, unauthorized nonstormwater discharges into the storm sewer system. Nonstormwater discharges or flows identified in 9VAC25-890-20 D 3 shall only be addressed if they are identified by the permittee as a significant contributor of pollutants discharging to the MS4. Flows that have been identified by the department as de minimis discharges are not significant sources of pollutants to surface water.</td>
<td>UVA has a policy specifically stating the University will prevent University activities from polluting the environment. All SOPs developed for activities which could create unauthorized nonstormwater discharges, reference illicit discharges as the reason the SOP is required. In addition, UVA has control of all activities occurring on UVA property and can work to address illicit discharge causing activity as soon as possible upon discovery.</td>
<td>Number of illicit discharges each year.</td>
<td>UVA’s environmental policy is available here: <a href="https://uvapolicy.virginia.edu/policy/SEC-002">https://uvapolicy.virginia.edu/policy/SEC-002</a> UVA’s SOPs are available here: <a href="https://www.fm.virginia.edu/depts/operations/environmental/procedures.html">https://www.fm.virginia.edu/depts/operations/environmental/procedures.html</a></td>
<td>Existing, Ongoing</td>
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<td>3.c. The permittee shall maintain, implement, and enforce illicit discharge detection and elimination (IDDE) written procedures designed to detect, identify, and address unauthorized nonstormwater discharges, including illegal dumping, to the small MS4 to effectively eliminate the unauthorized discharge. Written procedures shall include:</td>
<td>UVA has developed an SOP for Illicit Discharge Detection, for Sanitary Sewer Overflows, for responding to Bacteria Response related to RCA stream monitoring, and also for conducting Outfall Inspections. Since UVA owns the property on which its MS4 is located, illicit discharges on UVA property can be eliminated by addressing the activity causing the illicit discharge. UVA will continue to follow procedure for reporting and tracking illicit discharges and procedures for enforcing policies.</td>
<td>Follow SOPs and document number of spills, SSOs, and illicit discharge investigations annually.</td>
<td>UVA maintains a spreadsheet of all spills, illicit discharges, and incidents that had the potential to become illicit discharges. This spreadsheet is available upon request. SOPs are reviewed at least annually and the most recent version is available on the UVA website: <a href="https://www.fm.virginia.edu/depts/operations/environmental/procedures.html">https://www.fm.virginia.edu/depts/operations/environmental/procedures.html</a></td>
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<td>3.c.(2) - Dry weather field screening protocols to detect, identify, and eliminate illicit discharges to the MS4. The protocol shall include: (a) A prioritized schedule of field screening activities and rationale for prioritization determined by the permittee based on such criteria as age of the infrastructure, land use, historical illegal discharges, dumping or cross connections; (b) If the total number of MS4 outfalls is equal to or less than 50, a schedule to screen all outfalls annually; (c) If the total number of MS4 outfalls is greater than 50, a schedule to screen a minimum of 50 outfalls annually such that no more than 50% are screened in the previous 12-month period. The 50% criteria is not applicable if all outfalls have been screened in the previous three years; and (d) A mechanism to track the following information: The unique outfall identifier; Time since the last precipitation event; The estimated quantity of the last precipitation event; Site descriptions; Whether or not a discharge was observed; and if a discharge was observed, the estimated discharge rate and visual characteristics of the discharge.</td>
<td>Utilize written IDDE procedures to detect illicit discharges, report them, investigate them, and document the investigation. Procedures were revised and updated to ensure compliance with new MS4 program requirements. UVA currently has more than 50 but less than 100 outfalls and plans to screen all outfalls annually. Outfalls that had problems during past inspections or that have a high potential for illicit discharges may be visited more frequently.</td>
<td>Number of outfalls screened annually.</td>
<td>UVA has a written SOP for outfall inspections as well as a form used to document outfall inspections. The outfall inspection form has been incorporated into UVA’s maintenance tracking system, AIAM, which allows the outfall inspections to be recorded and stored electronically.</td>
<td>Existing, Ongoing</td>
<td>ER, FM</td>
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<td>3.c.(3) - A timeframe upon which to conduct an investigation to identify and locate the source of any observed unauthorized nonstormwater discharge. Priority of investigations shall be given to discharges of sanitary sewage and those believed to be a risk to human health and public safety. Discharges authorized under a separate VPDES or state permit require no further action under this permit.</td>
<td>UVA SOPs for illicit discharge detection and sanitary sewer overflows (SSOs) require staff to respond immediately to reports received.</td>
<td>Maintain staffing and equipment to respond to reports of illicit discharges, spills, and sanitary sewer overflows immediately upon notification.</td>
<td>Same spreadsheet as described in 3.c.(1)</td>
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<td>3.c.(4) - Methodologies to determine the source of all illicit discharges. If the permittee is unable to identify the source of an illicit discharge within six months of beginning the investigation then the permittee shall document that the source remains unidentified. If the observed discharge is intermittent, the permittee shall document that attempts to observe the discharge flowing were unsuccessful.</td>
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<tr>
<td>3.c.(5) - Methodologies for conducting a follow-up investigation for illicit discharges that are continuous or that permittees expect to occur more frequently than a one-time discharge to verify that the discharge has been eliminated except as provided for in Part I E 3 c (4);</td>
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<td>3.c.(6)(a)-(e) - A mechanism to track all illicit discharge investigations to document the following: (a) The dates that the illicit discharge was initially observed, reported, or both; (b) The results of the investigation, including the source, if identified; (c) Any follow-up to the investigation; (d) Resolution of the investigation; and (e) The date that the investigation was closed.</td>
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### Additional Comments on Illicit Discharge Detection and Elimination

The MS4 Program Plan is a planning document to aid UVA staff in management of UVA’s MS4 program. Revisions to the anticipated BMPs described in this MS4 Program Plan are expected throughout the life of this permit as part of the iterative process to reduce pollutant loading and protect water quality to the maximum extent practical. Each MCM will be reviewed and evaluated annually for effectiveness to determine whether or not changes to the MS4 Program Plan are necessary. Revisions required as a result of the iterative process or through evaluation of program effectiveness will be noted during the annual reporting process and appropriate updates will be made to the MS4 Program Plan. Internal documents, policies, and SOPs referenced in the Program Plan are intended to provide guidance and UVA reserves the right to change these documents at any time and in any manner. The MS4 General Permit requires these documents to be in place and the presence of the documents, not the details of their content, are the enforceable requirement of the permit. Revisions to the MS4 Program Plan or referenced documents will be made within 60 days upon discovery of the need for a change unless otherwise specified in the permit language. All BMPs and strategies are being implemented with consideration for the Chesapeake Bay and Local TMDLs and to support developing action plans to address such TMDLs in accordance with MS4 regulatory requirements. Unless otherwise stated, no monitoring data is collected for the MS4 program. Any documents noted as available upon request may be requested by emailing storm-water@virginia.edu.

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Minimum Control Measure No. 4: Construction Site Stormwater Runoff Control

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<tr>
<td>4.a. The permittee shall utilize its legal authority, such as ordinances, permits, orders, specific contract language, and interjurisdictional agreements, to address discharges entering the MS4 from regulated construction site stormwater runoff. The permittee shall control construction site stormwater runoff as follows: <em>only requirements pertaining to state agencies are listed below</em></td>
<td>As a state agency of higher education, UVA is legally required to follow the DEQ approved Annual Standards and Specifications (AS&amp;S) for Stormwater Management (SWM) and Erosion and Sediment Control (E&amp;SC) for all regulated land disturbing activities undertaken on UVA property, either by its internal workforce or contracted to external entities. DEQ approved Standards and Specifications include a description of the legal authorities utilized to ensure compliance with SWM and E&amp;SC regulations, personnel certification requirements, plan review and permitting requirements, inspection schedule, inspection and enforcement procedures (including all associated documents utilized during inspections), and reporting and recordkeeping requirements. The University Building Official will not issue a building permit for a project without documented approval of E&amp;SC and SWM Plans, if applicable. E&amp;SC plans must be approved by a certified plan reviewer prior to the commencement of land disturbing activities. Currently UVA has an MOU with the Thomas Jefferson Soil and Water Conservation District (TJSWCD) to conduct plan review, but UVA also retains authority and has staff certified to perform the reviews.</td>
<td>Number of inspections conducted annually.</td>
<td>The latest UVA AS&amp;S for SWM and E&amp;SC and associated approval letter from DEQ is available on the FM website at: <a href="https://www.fm.virginia.edu/depts/operations/environmental/erosion.html">https://www.fm.virginia.edu/depts/operations/environmental/erosion.html</a> UVA’s MOU with the TJSWCD for plan review services is available upon request.</td>
<td>Existing, Ongoing</td>
<td>ER, FM, OUBO</td>
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**MCM 4**
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<th>Minimum Control Measure No. 4: Construction Site Stormwater Runoff Control</th>
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<td>Minimum Control Measure No. 4: Construction Site Stormwater Runoff Control (there are no sub sections to this requirement)</td>
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4.b - The permittee shall require implementation of appropriate controls to prevent nonstormwater 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. The discharge of nonstormwater discharges other than those identified in 9VAC25-890-20 D through the MS4 is not authorized by this state permit.

**Additional Comments on Construction Site Stormwater Runoff Control**

The MS4 Program Plan is a planning document to aid UVA staff in management of UVA’s MS4 program. Revisions to the anticipated BMPs described in this MS4 Program Plan are expected throughout the life of this permit as part of the iterative process to reduce pollutant loading and protect water quality to the maximum extent practical. Each MCM will be reviewed and evaluated annually for effectiveness to determine whether or not changes to the MS4 Program Plan are necessary. Revisions required as a result of the iterative process or through evaluation of program effectiveness will be noted during the annual reporting process and appropriate updates will be made to the MS4 Program Plan. Internal documents, policies, and SOPs referenced in the Program Plan are intended to provide guidance and UVA reserves the right to change these documents at any time and in any manner. The MS4 General Permit requires these documents to be in place and the presence of the documents, not the details of their content, are the enforceable requirement of the permit. Revisions to the MS4 Program Plan or referenced documents will be made within 60 days upon discovery of the need for a change unless otherwise specified in the permit language. All BMPs and strategies are being implemented with consideration for the Chesapeake Bay and Local TMDLs and to support developing action plans to address such TMDLs in accordance with MS4 regulatory requirements. Unless otherwise stated, no monitoring data is collected for the MS4 program. Any documents noted as available upon request may be requested by emailing storm-water@virginia.edu.

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## Minimum Control Measure No. 5: Post-Construction Stormwater Management for New Development and Development on Prior Developed Lands

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| 5.a. The permittee shall address post construction stormwater runoff that enters the MS4 from the following land disturbing activities by implementing a post-construction stormwater runoff management program.  
*Only requirements pertaining to state agencies are listed below* | As a state agency of higher education, UVA is legally required to follow the DEQ approved Annual Standards and Specifications (AS&S) for Stormwater Management (SWM) and Erosion and Sediment Control (E&SC) for all regulated land disturbing activities undertaken on UVA property. DEQ is the program authority for UVA AS&S. The AS&S include a description of the legal authorities utilized to ensure compliance with SWM and E&SC regulations, personnel certification requirements, plan review and permitting requirements, inspection schedule, inspection and enforcement procedures (including all associated documents utilized during inspections), and reporting and recordkeeping requirements. The University Building Official will not issue a building permit for a project without documented approval of SWM Plans, if applicable. Currently, UVA has three staff members certified in plan review, but most plans are reviewed by a plan reviewer at the TJSWCD. UVA currently has four staff members with dual inspector certifications. | Number of projects reviewed annually to ensure stormwater runoff from UVA construction sites is managed appropriately for each site. | The latest UVA AS&S for SWM and E&SC and associated approval letter from DEQ is available on the UVA website at: https://www.fm.virginia.edu/depts/operations/environmental/erosion.html  
UVA’s MOU with the TJSWCD for plan review services is available upon request. | Existing, Ongoing | ER, FM, OUBO |
<p>| 5.b. The permittee shall implement an inspection and maintenance program for those stormwater management facilities owned or operated by the permittee that discharges to the MS4 as follows: | UVA owns and maintains all SWM facilities on its property within the MS4 with the exception of BMPs located on UVA property that is on a long-term lease to a local governmental agency. Each UVA facility has its own written inspection and maintenance procedures. Maintenance of the entire property on long term lease is the responsibility of the leasee. | BMPs are thoroughly inspected routinely to ensure proper function. New BMP inspection and maintenance procedures are created as new BMPs are added to UVA property. | UVA's SOP for BMP Inspection and maintenance can be found on FM's website: <a href="https://www.fm.virginia.edu/depts/operations/environmental/procedures.html">https://www.fm.virginia.edu/depts/operations/environmental/procedures.html</a>. Individual inspection checklists for each facility are maintained by FM and available upon request. | Existing, Ongoing | ER, FM |</p>
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<td>5.b.(2) - The permittee shall inspect stormwater management facilities owned or operated by the permittee no less than once per year.</td>
<td>All facilities are inspected at least annually, but some are visited more frequently for a quick inspection and routine maintenance, such as trash and debris removal.</td>
<td>Number of inspections completed. Routine maintenance, such as mowing or trash removal, is not tracked.</td>
<td>Inspection and maintenance procedures described in 5.b(1).</td>
<td>Existing, Ongoing</td>
<td>ER, FM</td>
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<td>5.b.(3) - If during the inspection of the stormwater management facility conducted in accordance with Part I E 5 b (2), it is determined that maintenance is required, the permittee shall conduct the maintenance in accordance with the written procedures developed under Part I E 5 b (1).</td>
<td>OUBO or FM staff receive and review all BMP inspection and maintenance written reports. OUBO or FM staff make arrangements for BMP maintenance in the event maintenance is more extensive than the inspection staff were able to take care of on their own.</td>
<td>Number of maintenance items reported. Not all maintenance items require immediate attention, but are tracked to observe patterns.</td>
<td>Inspection and maintenance procedures described in 5.b(1).</td>
<td>Existing, Ongoing</td>
<td>ER, FM</td>
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5.c. - This permit condition applies to Cities, Counties, or Towns. As a state agency, this condition does not apply to UVA and thus is not included.

5.d. The permittee shall maintain an electronic database or spreadsheet of all known permittee owned or permittee-operated and privately owned stormwater management facilities that discharge into the MS4. The database shall also include all BMPs implemented by the permittee to meet the Chesapeake Bay TMDL load reduction as required in Part II A. A database shall include the following information as applicable:

- UVA maintains a stormwater BMP spreadsheet that contains all of the information required in 5.d.(1)-(9). The spreadsheet will be updated no later than 30 days after a new BMP is brought online, a BMP is implemented to meet TMDL requirements, or an existing BMP is discovered.
- An accurate, up-to-date BMP spreadsheet.
- OUBO maintains a BMP spreadsheet that can be reviewed upon request by emailing storm-water at virginia.edu.

5.d.(1)-(9) The stormwater management facility or BMP type; The stormwater management facility or BMPs location as latitude and longitude; The acres treated by the stormwater management facility or BMP, including total acres, pervious acres, and impervious acres; The date the facility was brought online (MM/YYYY). If the date brought online is not known, the permittee shall use June 30, 2005; The 6th Order Hydrologic Unit Code in which the stormwater management facility is located; Whether the stormwater management facility or BMP is owned or operated by the permittee or privately owned; Whether or not the stormwater management facility or BMP is part of the permittee’s Chesapeake Bay TMDL action plan required in Part II A or local TMDL action plan required in Part II B, or both; If the stormwater management facility or BMP is privately owned, whether a maintenance agreement exists; and The date of the permittee’s most recent inspection of the stormwater management facility or BMP.
## Minimum Control Measure No. 5: Post-Construction Stormwater Management for New Development and Development on Prior Developed Lands

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<td>S.e. The electronic database or spreadsheet shall be updated no later than 30 days after a new stormwater management facility is brought online, a new BMP is implemented to meet a TMDL load reduction as required in Part II, or discovered if it is an existing stormwater management facility.</td>
<td>Maintain inventory of stormwater management facilities. Continue to update existing facility inventory database and GIS map as described in 3.a.(1) and include new requirement for this permit cycle to include whether the facility or BMP is part of a TMDL action plan. The spreadsheet is updated as soon as the appropriate OUBO staff learns about a project which will add a new BMP and will update the spreadsheet upon completion of the project.</td>
<td>An accurate, up-to-date BMP spreadsheet.</td>
<td>The spreadsheet is maintained as described in S.d.(1)-(9).</td>
<td>Existing, Ongoing</td>
<td>ER, FM</td>
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<td>(there are no sub sections to this requirement)</td>
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<td>S.f. The permittee shall use the DEQ Construction Stormwater Database or other application as specified by the department to report each stormwater management facility installed after July 1, 2014, to address the control of post-construction runoff from land disturbing activities for which the permittee is required to obtain a General VPDES Permit for Discharges of Stormwater from Construction Activities.</td>
<td>Stormwater management facilities are reported to DEQ as required.</td>
<td>None.</td>
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<td>(there are no sub sections to this requirement)</td>
<td>When the operator for a site with a construction general permit submits a notice of termination, they are required to submit a list of BMPs that were added to the site during construction. DEQ is the program authority for UVA’s AS&amp;S and as such, DEQ enters stormwater management facility information into the database as part of the construction general permit termination process.</td>
<td>Stormwater management facilities are reported to DEQ as required.</td>
<td>None.</td>
<td>Ongoing</td>
<td>ER, FM</td>
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<td>S.g. No later than October 1 of each year, the permittee shall electronically report the stormwater management facilities and BMPs implemented between July 1 and June 30 of each year using the DEQ BMP Warehouse and associated reporting template for any practices not reported in accordance with Part I E 5 f including stormwater management facilities installed to control post-development stormwater runoff from land disturbing activities less than one acre in accordance with the Chesapeake Bay Preservation Act regulations (9VAC25-830) and for which a General VPDES Permit for Discharges of Stormwater from Construction Activities was not required.</td>
<td>Stormwater management facilities are reported to DEQ as required.</td>
<td>None.</td>
<td></td>
<td>Ongoing</td>
<td>ER, FM</td>
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<tr>
<td>(there are no sub sections to this requirement)</td>
<td>OUBO will report stormwater management facilities and BMP installations as specified by this requirement upon installation or in conjunction with submission of UVA’s annual report.</td>
<td>Stormwater management facilities are reported to DEQ as required.</td>
<td>None.</td>
<td>Ongoing</td>
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<td>6.a. - The permittee shall maintain and implement written procedures for those activities at facilities owned or operated by the permittee, such as road, street, and parking lot maintenance; equipment maintenance; and the application, storage, transport, and disposal of pesticides, herbicides, and fertilizers designed to:</td>
<td>UVA has developed several SOPs to minimize the potential for or prevent pollutant discharges from activities of concern. These include, but are not limited to, SOPs on Waste Management, Vehicle and Equipment Washing, and Building Fire Sprinkler System Flushing.</td>
<td>Number of illicit discharges caused by UVA operations.</td>
<td>All SOPs are saved on the UVA website and are reviewed at least annually or whenever an operations or equipment change warrants such review. <a href="https://www.fm.virginia.edu/depts/operations/environmental/procedures.html">https://www.fm.virginia.edu/depts/operations/environmental/procedures.html</a> In addition, UVA tracks all reported and discovered illicit discharges or spills in a spreadsheet and follows up as needed to determine if activity patterns might warrant the need for a new or updated SOP.</td>
<td>Existing, Ongoing</td>
<td>ER, FM</td>
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<td>6.a.(1) - Prevent illicit discharges;</td>
<td>UVA has developed SOPs on Waste Management, Used Oil Disposal, Used Cooking Oil Disposal, UVA Recycling Sorting Facility, and Disposal of Landscape Organic Wastes.</td>
<td>Same goal as stated in 6.a.(1)</td>
<td>Same SOP process as described in 6.a.(1)</td>
<td>Existing, Ongoing</td>
<td>ER, FM</td>
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<td>6.a.(2) - Ensure the proper disposal of waste materials, including landscape waste;</td>
<td>UVA has developed an SOP on Vehicle and Equipment Washing as well as one on Exterior Surfaces and Building Washing.</td>
<td>Same goal as stated in 6.a.(1)</td>
<td>Same SOP process as described in 6.a.(1)</td>
<td>Existing, Ongoing</td>
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<td>6.a.(3) - Prevent the discharge of wastewater or permittee vehicle wash water or both into the MS4 without authorization under a separate VPDES permit;</td>
<td>UVA has developed an SOP on Water Disposal from Dewatering Activities.</td>
<td>Same goal as stated in 6.a.(1)</td>
<td>Same SOP process as described in 6.a.(1)</td>
<td>Existing, Ongoing</td>
<td>ER, FM</td>
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<td>6.a.(4) - Require implementation of best management practices when discharging water pumped from utility construction and maintenance activities;</td>
<td>UVA has developed an SOP on Salt/Sand and Spreader Shed Maintenance and developed a SWPPP for the FM Yard.</td>
<td>Same goal as stated in 6.a.(1)</td>
<td>Same SOP process as described in 6.a.(1)</td>
<td>Existing, Ongoing</td>
<td>ER, FM</td>
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### Minimum Control Measure No. 6: Pollution Prevention and Good Housekeeping for UVA Facility Operations

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<td>6.a.(6) - Prevent pollutant discharge into the MS4 from leaking municipal automobiles and equipment; and</td>
<td>UVA has developed an SOP on Vehicle and Equipment Maintenance.</td>
<td>Same goal as stated in 6.a.(1)</td>
<td>Same SOP process as described in 6.a.(1)</td>
<td>Existing, Ongoing ER, FM</td>
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<tr>
<td>6.a.(7) - Ensure that the application of materials, including fertilizers and pesticides, is conducted in accordance with the manufacturer's recommendations.</td>
<td>Only licensed applicators are allowed to use pesticides, herbicides, and fertilizers on UVA property covered by the MS4 permit. All such chemicals are required to be stored and transported underneath a cover where it cannot be exposed to stormwater. All fertilizer and pesticide applicators are certified and their certifications are reviewed annually by UVA's certified Nutrient Management Planner.</td>
<td>Ensure applicators have required licenses. Number of certified pesticide, herbicide, and fertilizer users at UVA.</td>
<td>Nutrient management plans are updated and maintained by UVA's certified Nutrient Management Planner and are available upon request.</td>
<td>Existing, Ongoing</td>
<td>A, EHS, ER, FM</td>
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<td>6.b. The written procedures established in accordance with Part I E 6 a shall be utilized as part of the employee training program at Part I E 6 m. [there are no sub sections to this requirement]</td>
<td>SWPPPs, SOPs, and any other written procedures shall be covered in the employee training program that is included in Appendix D.</td>
<td>Track staff training provided in compliance with this requirement.</td>
<td>Written training materials and staff training records. SOPs described in 6.a(1) are part of the training process for appropriate staff.</td>
<td>Existing, Ongoing</td>
<td>A, ER, FM</td>
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<td>6.c. - Within 12 months of state permit coverage, the permittee shall identify which of the high priority facilities have a high potential of discharging pollutants. The permittee shall maintain and implement a site specific stormwater pollution prevention plan (SWPPP) for each facility identified. High priority facilities that have a high potential for discharging pollutants are those facilities that are not covered under a separate VPDES permit and which any of the following materials or activities occur and are expected to have exposure to stormwater resulting from rain, snow, snowmelt or runoff:</td>
<td>UVA has completed an evaluation of high priority facilities with a high potential of discharging pollutants, which is included in Appendix C. For all identified high priority facilities with a high potential to discharge, UVA has already prepared a SWPPP which is maintained internally. In addition, UVA will annually review facilities that have been identified as high priority, but do not have a high potential to discharge in order to determine if a SWPPP is needed. Facilities with SWPPPs are inspected annually. Facilities will be added or removed from the list of high priority facility with a high potential to discharge during the permit cycle as conditions warrant.</td>
<td>Up-to-date list of high priority facilities with a high potential of discharging pollutants, which require SWPPPs.</td>
<td>The list of high priority facilities with a high potential to discharge pollutants along with any SWPPPs developed is maintained as an appendix to the MS4 Program Plan. The SWPPPs are available online at: <a href="https://www.fm.virginia.edu/depts/operations/environmental/procedures.html">https://www.fm.virginia.edu/depts/operations/environmental/procedures.html</a></td>
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<td><strong>6.d</strong> - Each SWPPP as required in Part I E 6.c shall include the following:</td>
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<td>6.d.(1)-(8) - A site description that includes a site map identifying all outfalls, direction of stormwater flows, existing source controls, and receiving water bodies; A description and checklist of the potential pollutants and pollutant sources; A description of all potential nonstormwater discharges; Written procedures designed to reduce and prevent pollutant discharge; A description of the applicable training as required in Part I E 6.m; Procedures to conduct an annual comprehensive site compliance evaluation; An inspection frequency of no less than once per year and maintenance requirements for site specific source controls. The date of each inspection and associated findings and follow-up shall be logged in each SWPPP; and A log of each unauthorized discharge, release, or spill incident reported in accordance with Part III G including the following information: (a) Date of incident; (b) Material discharged, released, or spilled; and (c) Estimated quantity discharged, released or spilled.</td>
<td>UVA has developed a SWPPP template which contains the information required in 6.d.(1)-(8). Any subsequent SWPPPs which need to be developed will be developed using this template.</td>
<td>SWPPP template and SWPPPs contain all permit-required information.</td>
<td>The SWPPP template and SWPPPs are available upon request.</td>
<td>Existing, Ongoing</td>
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<td>6.e. - No later than June 30 of each year, the permittee shall annually review any high-priority facility owned or operated by the permittee for which a SWPPP has not been developed to determine if the facility has a high potential to discharge pollutants as described in Part I E 6 c. If the facility is determined to be a high-priority facility with a high potential to discharge pollutants, the permittee shall develop a SWPPP meeting the requirements of Part I E 6 no later than December 31 of that same year.</td>
<td>UVA will annually review high priority facilities owned by UVA for which a SWPPP has not been developed to determine if the facility has a high potential to discharge pollutants. A SWPPP will be developed by December 31 of that same year for any such facility if the need for a SWPPP is determined.</td>
<td>Facilities requiring SWPPPs are identified in a timely manner.</td>
<td>The list of high priority facilities with a high potential to discharge pollutants, including whether or not a SWPPP has been developed, is maintained as an appendix to the MS4 Program Plan.</td>
<td>Existing, Ongoing</td>
<td>ER, FM</td>
</tr>
<tr>
<td>6.f. - The permittee shall review the contents of any site specific SWPPP no later than 30 days after any unauthorized discharge, release, or spill reported in accordance with Part III G to determine if additional measures are necessary to prevent future unauthorized discharges, releases, or spills. If necessary, the SWPPP shall be updated no later than 90 days after the unauthorized discharge.</td>
<td>UVA will review site specific SWPPPs within 30 days of any spills, releases, or major changes to site operations.</td>
<td>Updated SWPPPs.</td>
<td>SWPPPs are available online at <a href="https://www.fm.virginia.edu/depts/operations/environmental/procedures.html">https://www.fm.virginia.edu/depts/operations/environmental/procedures.html</a></td>
<td>Existing, Ongoing</td>
<td>ER, FM</td>
</tr>
<tr>
<td>6.g. - The SWPPP shall be kept at the high-priority facility with a high potential to discharge and utilized as part of staff training required in Part I E 6 m. The SWPPP and associated documents may be maintained as a hard copy or electronically as long as the documents are available to employees at the applicable site.</td>
<td>All UVA SWPPPs are stored electronically are available to employees on site. SWPPPs and associated SOPs are used as part of staff training.</td>
<td>Electronically available SWPPPs. Training materials containing SWPPP related information.</td>
<td>Training materials are stored on FM's internal server and are available upon request. SWPPPs and SOPs are available online at <a href="https://www.fm.virginia.edu/depts/operations/environmental/procedures.html">https://www.fm.virginia.edu/depts/operations/environmental/procedures.html</a></td>
<td>Existing, Ongoing</td>
<td>ER, FM</td>
</tr>
<tr>
<td>6.h. - If activities change at a facility such that the facility no longer meets the criteria of a high-priority facility with a high potential to discharge pollutants as described in Part I E 6 c, the permittee may remove the facility from the list of high-priority facilities with a high potential to discharge pollutants.</td>
<td>The list of high priority facilities with a high potential to discharge pollutants is available in Appendix C. Any facilities evaluated for or removed form the list will be documented with the rationale for their removal. Facilities are evaluated at least annually and may be added back to the list if site conditions warrant.</td>
<td>Up-to-date list of high priority facilities with a high potential to discharge pollutants.</td>
<td>The list of high priority facilities with a high potential to discharge pollutants is maintained as an appendix to the MS4 Program Plan.</td>
<td>Existing, Ongoing</td>
<td>ER, FM</td>
</tr>
<tr>
<td>6.i. The permittee shall maintain and implement turf and landscape nutrient management plans that have been developed by a certified turf and landscape nutrient management planner in accordance with § 10.1-104.2 of the Code of Virginia on all lands owned or operated by the permittee where nutrients are applied to a contiguous area greater than one acre. If nutrients are being applied to achieve final stabilization of a land disturbance project, application shall follow the manufacturer's recommendations.</td>
<td>UVA is a state agency and follows the requirements for turf and landscape nutrient management plans specified in 6.j. which regulate nitrogen application rates on lands owned by UVA.</td>
<td>Track acres of UVA lands upon which Nutrient Management Plans have been implemented.</td>
<td>Nutrient management plans are updated and maintained by UVA’s certified Nutrient Management Planner and are available upon request.</td>
<td>Existing, Ongoing</td>
<td>A, EHS, ER, FM</td>
</tr>
</tbody>
</table>
### Minimum Control Measure No. 6: Pollution Prevention and Good Housekeeping for UVA Facility Operations

<table>
<thead>
<tr>
<th>Applicable Regulatory Text</th>
<th>BMPs or Strategies Anticipated to be Implemented</th>
<th>Measurable Goal</th>
<th>Standard Operating Procedures, Policies, or Documents Incorporated by reference to support this BMP or Strategy</th>
<th>Implementation Schedule</th>
<th>RESPONSIBLE DEPARTMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>6.j.</strong> Permittees with lands regulated under § 10.1-104.4 of the Code of Virginia, including state agencies, state colleges and universities, and other state government entities, shall continue to implement turf and landscape nutrient management plans in accordance with this statutory requirement.</td>
<td>UVA has implemented the Nutrient Management Plans to moderate the use of fertilizer on all lawn and landscaped areas on state-owned lands. A staff member at UVA's Office of Environmental Health and Safety is a certified Nutrient Management Planner and ensures the Nutrient Management Plans are accurate and up-to-date. UVA currently has the following Nutrient Management Plans: John Paul Jones Arena, Athletics, UVA Grounds, and Intramural-Recreational Sports. A total of 209.6 acres are covered by these plans, which are stored electronically on UVA servers.</td>
<td>Same goal as stated in 6.i</td>
<td>Same documents as referenced in 6.i</td>
<td>Existing, Ongoing</td>
<td>A, EHS, ER, FM</td>
</tr>
<tr>
<td><strong>6.k.</strong> The permittee shall not apply any deicing agent containing urea or other forms of nitrogen or phosphorus to parking lots, roadways, and sidewalks, or other paved surfaces.</td>
<td>UVA's Nutrient Management Plans prohibit the usage of deicing agents containing urea or other forms of N or P.</td>
<td>No deicers containing N or P are used at UVA.</td>
<td>Nutrient management plans are updated and maintained by UVA’s certified Nutrient Management Planner and are available upon request.</td>
<td>Existing, Ongoing</td>
<td>A, EHS, ER, FM</td>
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<tr>
<td><strong>6.l.</strong> The permittee shall require through the use of contract language, training, standard operating procedures, or other measures within the permittee’s legal authority that contractors employed by the permittee and engaging in activities with the potential to discharge pollutants use appropriate control measures to minimize the discharge of pollutants to the MS4.</td>
<td>For construction sites over one acre, contractors must adhere to their SWPPP, which is reviewed regularly by UVA inspectors. Contractors are expected to adhere to UVA’s SOPs while doing work on UVA property and contracts can be terminated for failure to comply. References to SOPs are also included in Division 1 Guidelines, which includes language about governing authority. UVA has also added specific language into contract vendor requirements to emphasize this requirement. In addition, FM and/or OUBO staff aims to talk to contractor representatives during the Safety Summit organized by UVA Occupational Health and Safety staff.</td>
<td>Contractors follow best management practices established by and followed by UVA staff. Document ways contractors are engaged in annual report.</td>
<td>Construction site SWPPPs are maintained on each construction site. SOPs are maintained on the FM website. UVA Division 1 Guidelines are available on the UVA website.</td>
<td>Existing, Ongoing</td>
<td>ER, FM</td>
</tr>
<tr>
<td>Applicable Regulatory Text</td>
<td>BMPs or Strategies Anticipated to be Implemented</td>
<td>Measurable Goal</td>
<td>Standard Operating Procedures, Policies, or Documents Incorporated by reference to support this BMP or Strategy</td>
<td>Implementation Schedule</td>
<td>RESPONSIBLE DEPARTMENTS</td>
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<td>6.m. The permittee shall develop a training plan in writing for applicable staff that ensures the following:</td>
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<td>6.m.(1) - Field personnel receive training in the recognition and reporting of illicit discharges no less than once per 24 months;</td>
<td>UVA updates and maintains a training program as needed to provide applicable staff with necessary training on IDDE, good housekeeping, pollution prevention, spill prevention, environmental awareness, SOPs and other required training. Training is provided to appropriate staff at least once every 24 months and is reviewed for appropriateness.</td>
<td>Track training program, dates, and individuals trained. Update training plan as needed to ensure appropriate employees are adequately trained.</td>
<td>The training program is maintained as an appendix to the MS4 Program Plan. Training records are saved on a UVA secure server and are available on request. Some planned training efforts may be modified due to COVID-19 restrictions on in-person gatherings issued by the Governor of Virginia and the UVA President. Any such modifications will be noted in the appropriate annual report.</td>
<td>Existing, Ongoing</td>
<td>ER, FM</td>
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<tr>
<td>6.m.(2) - Employees performing road, street, and parking lot maintenance receive training in pollution prevention and good housekeeping associated with those activities no less than once per 24 months;</td>
<td>Same strategy as described in 6.m.(1).</td>
<td>Same goal as stated in 6.m.(1)</td>
<td>Same documentation as described in 6.m.(1)</td>
<td>Existing, Ongoing</td>
<td>ER, FM</td>
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<tr>
<td>6.m.(3) - Employees working in and around maintenance, public works, or recreational facilities receive training in good housekeeping and pollution prevention practices associated with those facilities no less than once per 24 months;</td>
<td>Professional and administrative staff working in and around such facilities that do not receive training under 6.m.(1)-(2) will receive training on who to contact when concerns about good housekeeping or pollution prevention are observed.</td>
<td>Same goal as stated in 6.m.(1)</td>
<td>Same documentation as described in 6.m.(1)</td>
<td>Existing, Ongoing</td>
<td>ER, FM</td>
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<tr>
<td>6.m.(4) - Employees and contractors hired by the permittee who apply pesticides and herbicides are trained or certified in accordance with the Virginia Pesticide Control Act (§ 3.2-3900 et seq. of the Code of Virginia). Certification by the Virginia Department of Agriculture and Consumer Services (VDACS) Pesticide and Herbicide Applicator program shall constitute compliance with this requirement;</td>
<td>Since UVA is a state agency, all applicators are required to be certified through VDACS and turn in their application records to them. Applicators are required to keep certification records and receive continuing education credit as needed.</td>
<td>Only certified pesticide and herbicide applicators are used on UVA property.</td>
<td>UVA’s Certified Nutrient Management planner verifies applicator licenses and that applicators are maintaining required records.</td>
<td>Existing, Ongoing</td>
<td>ER, FM</td>
</tr>
<tr>
<td>6.m.(5) - Employees and contractors serving as plan reviewers, inspectors, program administrators, and construction site operators obtain the appropriate certifications as required under the Virginia Erosion and Sediment Control Law and its attendant regulations;</td>
<td>UVA has two employees certified as dual inspectors, two employees certified as dual combined administrators, and one employee certified as a dual plan reviewer through DEQ’s program. UVA uses Thomas Jefferson Soil and Water Conservation District (TJSWCD) staff for some plan review, and these staff are also certified in plan review. UVA requires a copy of the Responsible Land Disturber certification from at least one responsible individual from each regulated land disturbing project before the site breaks ground.</td>
<td>Up-to-date staff working on E&amp;SC and SWM projects. Certification renewals are maintained at the required intervals.</td>
<td>Copies of certification records are maintained on a UVA secure server and are available upon request.</td>
<td>Existing, Ongoing</td>
<td>ER, FM</td>
</tr>
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<td>Applicable Regulatory Text</td>
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<td>Implementation Schedule</td>
<td>RESPONSIBLE DEPARTMENTS</td>
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<td>6.m.(6) - Employees and contractors implementing the stormwater program obtain the appropriate certifications as required under the Virginia Stormwater Management Act and its attendant regulations; and 6.m.(7) - Employees whose duties include emergency response have been trained in spill response. Training of emergency responders such as firefighters and law enforcement officers on the handling of spill releases as part of a larger emergency response training shall satisfy this training requirement and be documented in the training plan.</td>
<td>Same strategy as described in 6.m.(5)</td>
<td>Same goal as stated in 6.m.(5)</td>
<td>Same documentation as described in 6.m.(5)</td>
<td>Existing, Ongoing</td>
<td>ER, FM</td>
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<tr>
<td>UVA maintains an in-house police force who are trained in emergency response. The police biannually review and sign UVA’s Hazardous Material Response policy, which describes how they are expected to handle spills. In addition, EHS maintains staff who are 40-hour HAZWOPER trained in spill response. HAZWOPER training requires annual certification.</td>
<td>Track individuals trained.</td>
<td>Training records are maintained by the PD and EHS and are available upon request.</td>
<td></td>
<td>Existing, Ongoing</td>
<td>EHS, ER, FM, PD</td>
</tr>
<tr>
<td>6.n. - The permittee shall maintain documentation of each training event conducted by the permittee to fulfill the requirements of Part I E 6 m for a minimum of three years after the training event. The documentation shall include the following information: 6.n.(1)-(3) - The number of employees attending the training event; The number of employees attending the training event; and The objective of the training event.</td>
<td>UVA OUBO and FM retains copies of FM training records, including the number of employees, the date, and the type of training for three years except for training provided to the PD and EHS. The PD and EHS maintain their own training records. UVA’s training plan can be found in Appendix C. Some training plans may be modified due to COVID-19 restrictions on in-person gatherings issued by the Governor of Virginia and the UVA President.</td>
<td>Adequately and appropriately trained staff.</td>
<td>Most training records are stored on a UVA secure network. EHS and Police training records are maintained by those departments and OUBO will coordinate with them to receive the training records at the scheduled intervals. Records are available upon request.</td>
<td>Existing, Ongoing</td>
<td>ER, FM</td>
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<tr>
<td>6.o. - The permittee may fulfill the training requirements in Part I E 6 m, in total or in part, through regional training programs involving two or more MS4 permittees; however, the permittee shall remain responsible for ensuring compliance with the training requirements. (there are no sub sections to this requirement)</td>
<td>UVA is not currently planning to fulfill training requirements through regional training programs, but will update the MS4 Program Plan accordingly if the training plans change.</td>
<td>Not applicable</td>
<td>Not applicable</td>
<td>NA</td>
<td>ER, FM</td>
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</tbody>
</table>
The MS4 Program Plan is a planning document to aid UVA staff in management of UVA's MS4 program. Revisions to the anticipated BMPs described in this MS4 Program Plan are expected throughout the life of this permit as part of the iterative process to reduce pollutant loading and protect water quality to the maximum extent practical. Each MCM will be reviewed and evaluated annually for effectiveness to determine whether or not changes to the MS4 Program Plan are necessary. Revisions required as a result of the iterative process or through evaluation of program effectiveness will be noted during the annual reporting process and appropriate updates will be made to the MS4 Program Plan. Internal documents, policies, and SOPs referenced in the Program Plan are intended to provide guidance and UVA reserves the right to change these documents at any time and in any manner. The MS4 General Permit requires these documents to be in place and the presence of the documents, not the details of their content, are the enforceable requirement of the permit. Revisions to the MS4 Program Plan or referenced documents will be made within 60 days upon discovery of the need for a change unless otherwise specified in the permit language. All BMPs and strategies are being implemented with consideration for the Chesapeake Bay and Local TMDLs and to support developing action plans to address such TMDLs in accordance with MS4 regulatory requirements. Unless otherwise stated, no monitoring data is collected for the MS4 program. Any documents noted as available upon request may be requested by emailing storm-water@virginia.edu.

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Additional Comments on Pollution Prevention and Good Housekeeping

A - University Athletics Department
EHS - UVA Office of Environmental Health and Safety
ER - UVA Environmental Resources
FM - UVA Facilities Management
OUBO - UVA Office of the University Building Official
PD - UVA Police Department
RSEP - Rivanna Stormwater Education Partnership

MCM 6 Page 24 of 33
Appendix A
Stormwater Public Education, Outreach, Involvement and Participation Plan
Public Education and Outreach
and
Public Involvement and Participation
Program

1. Background - Coordinating efforts amongst local MS4 operators

Educating, reaching out to, and involving the public in stormwater issues is accomplished primarily through participation in the Rivanna Stormwater Education Partnership (RSEP). The RSEP is a collaborative effort among local public entities in the City of Charlottesville and the surrounding County of Albemarle that hold small MS4 permits under the National Pollutant Discharge Elimination System program. The RSEP is dedicated to helping its members achieve the MS4 permit requirements related to education, outreach, and public participation in stormwater management.

The MS4 permit holders that comprise RSEP are Albemarle County, the City of Charlottesville, and the University of Virginia. Other members of RSEP are Albemarle County Public Schools, the Albemarle County Service Authority, and the Rivanna Water and Sewer Authority. The Thomas Jefferson Soil and Water Conservation District (TJSWCD) provides support to RSEP and serves as its coordinating body.

Founded in March 2003, the RSEP meets a minimum of six times a year to plan and implement stormwater education initiatives and share information about each partner’s stormwater programs. Education initiatives are undertaken by the RSEP to help make citizens aware of stormwater issues, while also equipping them with practical knowledge and actions to help improve local water quality. RSEP utilizes a multi-faceted approach to educate and provide outreach across targeted urban areas (Figure 1). Past campaign materials, including print ads, movie theatre ads, posters on public transit buses, magnets, radio spots, and utility bill inserts are written in simple, easy to understand language and often utilize simple pictures or drawings to help the message come across to all generations and all education levels. RSEP also provides some campaigns in Spanish. Education and outreach materials are available at www.rivanna-stormwater.org. Each partner pays an annual membership fee to help fund RSEP projects. In addition, the RSEP has successfully applied for and partnered on grants to supplement education efforts.

The RSEP has produced effective and far-reaching education programs that have benefited from the variety of expertise and resources each partner offers. Planning and implementing education initiatives through the RSEP has resulted in Rivanna River watershed-focused projects and has avoided the over-exposure and redundancy that might result if each partner were carrying out projects on their own.
Figure 1. **Urban Areas Targeted by RSEP Education and Outreach**

MCM#1 – Public Education and Outreach
MCM#2 – Public Involvement and Participation
MS4 Program Plan (2018 – 2023)

2. Identification of high-priority water quality issues and their importance

RSEP held several meetings to discuss and determine the high priority water quality issues for the region, which will be the focus of their education and outreach campaigns for the current MS4 permit cycle. During the 2013-2018 permit cycle, RSEP chose local and regional water quality impairments, bacteria, sediment, and nutrients (nitrogen and phosphorus), as their high priority issues. Campaigns conducted during this time frame were considered successful. However, RSEP found the chosen issues limited in some ways the extent of outreach efforts that the group could undertake. For the 2018-2023 permit cycle, RESP members have chosen to address broader categories of water quality issues, namely runoff volume reduction, potential runoff pollutants, and TMDL pollutants as the high priority issues. By grouping regional water quality impairments as one high priority issue, RSEP can still address this highly important topic, while allowing the group to also address other issues that also have the potential to impact water quality in the region.

The reasoning behind choosing each of these high-priority issues is further described in the following sections. Examples of planned education and outreach campaigns and general content ideas are provided in Table 1. Using the iterative adaptive approach, the plan may be modified at any time during the permit cycle to address changes in local stormwater issues or concerns.

   a. Runoff Volume Reductions

One of the biggest challenges facing urban waterways is the sheer volume of runoff being transported from impervious surfaces to the streams. In developed areas, rainwater falls on impervious surfaces, such as buildings, parking lots, and driveways which prevent water from infiltrating into the ground and recharging local aquifers. This rainwater flows rapidly across impervious surfaces and into storm sewers, which direct the water to local streams. As a result of this rapid transport to local streams, stream flow volumes and velocities are significantly higher than would be observed under natural conditions. These high, rapid flows can cause stream bank erosion and changes in stream ecosystem habitats. Best management practices (BMPs) can be installed to mitigate the impacts of development by slowing down the transport of water from impervious surfaces to local streams.

While localities and developers are required to install BMPs for certain construction projects, maintenance of these BMPs is not always taken into account during their installation. In addition, there are many BMPs homeowners can implement or install to reduce the runoff volume and velocity from their properties and contribute to healthier streams. RSEP intends to provide education and outreach to both homeowners as well as new and existing BMP owners during the permit period. The goal of this education program will be to educate recipients on the negative impacts of increased stormwater volume and velocity and also provide ideas for ways they can reduce, mitigate, or treat runoff from their property.

   b. Potential Runoff Pollutants

As stormwater flows across roadways, parking lots, and driveways, it picks up pollutants such as sediment, oil, nutrients, bacteria, and trash that are lying on the surface. Sources of these pollutants can be as varied as the pollutants themselves, ranging from pet waste left by a local resident to a diesel fuel spill on a local industrial site to cigarette butts tossed on the ground by passing smokers.
There are two primary ways to handle potential runoff pollutants. The first is to prevent the potential pollutant from becoming a water quality issue. Educational messaging for this approach will range from reminding restaurants how to properly handle their used cooking oil to reminding residents to obtain a soil test before applying fertilizer on their lawns. The second way to handle potential runoff pollutants is to try to capture them after they are out in the environment. While this approach is not ideal, it is a necessary component of a comprehensive outreach program. In addition to reducing runoff as previously discussed, certain BMPs can also help trap or absorb these pollutants in the environment and prevent them from reaching local waterways. In addition, the illicit discharge and elimination (IDDE) programs run by the various MS4 permit holders will help to identify and eliminate possible illicit discharges resulting from human activity in the watershed. IDDE outreach and education efforts provided by RSEP have warned against storm drain dumping and encouraged use of the RSEP Water Pollution Hot Line to report suspected illegal discharges.

c. TMDL Impairments – Bacteria, Sediment, Nitrogen, Phosphorus

The Chesapeake Bay TMDL requires pollution reductions in sources of phosphorus, nitrogen, and sediment loads across the Bay watershed and sets pollution limits need to achieve desired water quality standards. These TMDL impairments have significant impacts in the local area. In addition to sediment reductions required in the Chesapeake Bay TMDL, sediment source reductions are also required by the Rivanna River Benthic TMDL. Local TMDLs for streams such as Meadow and Lodge Creek also touch on sediment as a pollutant source, with bacteria as an added pollutant of concern in many local streams.

TMDL impairments are logical topics for MS4 outreach and education programs, as most of the streams with TMDLs in the local areas are urban streams and MS4s are concentrated in the urban areas. Of the stream miles assessed within the targeted urban areas, almost 30% have an impaired benthic macro-invertebrate community, as a result of too much sediment in our waterways. The Final Report of the Benthic TMDL Development for the Rivanna River Watershed submitted to VA DEQ (2008) identifies an existing sediment load from land-based and in-stream erosion from the MS4 point source. Over a quarter (26%) of streams assessed within the targeted urban areas are considered impaired by excessive amounts of bacteria. Bacteria impairments in these streams can be caused by a variety of sources urban stormwater, pet waste, leaking sewer pipes, wildlife excrement, and agricultural uses. In addition, the MS4 general permit requires permittees to utilize turf and landscape management plans to minimize nutrient usages, while also prohibiting the usage of deicers containing urea, nitrogen, or phosphorus. Similar messaging is also relevant to home and business owners.

The goal of outreach and education campaigns focusing on TMDL impairments will include a variety of approaches, strategies, and target audiences. Licensed dog owners in the City and County can be targeted to pick up pet waste to reduce bacteria. Strategies utilized to address reductions in runoff volume can be used to target sediment. While homeowners, gardeners, and landscape maintenance professionals can be targeted to address fertilizer usage.

3. Providing public involvement opportunities during the reporting cycle

1 Final 2012 305(b)/303(d) Water Quality Assessment Integrated Report, VA DEQ, 2014
2 Final 2012 305(b)/303(d) Water Quality Assessment Integrated Report, VA DEQ, 2014
MCM#1 – Public Education and Outreach
MCM#2 – Public Involvement and Participation
MS4 Program Plan (2018 – 2023)
This Outreach and Education Plan will be posted on the RSEP website, the City of Charlottesville’s website, Albemarle County’s website, and UVA’s website and will remain available for the duration of the 2018-2023 MS4 Permit Cycle. At any time during the permit cycle, the public can visit any of these websites to report potential illicit discharges, improper disposal or spills to the MS4, complaints regarding land disturbing activities, or other potential stormwater pollution concerns. In addition, the public can also utilize these websites to provide input on any of the RSEP partners MS4 programs, including the Outreach and Education Plan.

4. Adjusting target audience and messages to address any observed weaknesses or shortcomings

As necessary, RSEP will adjust target audiences and messages to address any observed weaknesses or shortcomings in the public education and outreach program. Additional educational materials have already been developed and may be modified or improved to address changing needs. In addition, the messaging described in Table 1 or activities described in Table 2 may be altered to appeal to different target audiences or to address a different high priority issue than the one listed. Other methods beyond those currently described in Tables 1 and 2 are likely to be employed as well. For example, RSEP members are currently discussing the possibility of creating a humorous stormwater education video to appeal to residents, brainstorming ways to partner with local arts on an educational display, considering starting a “love your watershed” initiative, as well as brainstorming additional “new” strategies to engage audiences in different ways. Some of these “new” ideas will require support and resources beyond what RSEP alone can provide and thus are not listed as planned education strategies or public involvement opportunities. However, RSEP will continue to pursue these ideas where feasible to find innovative ways to reach new audiences.

5. COVID-19 Pandemic Adjustments

The COVID-19 pandemic that began in March 2020 created unprecedented changes in daily life and business functions. The Governor of Virginia enacted executive orders which required people to stay at home, forced businesses to adjust or cease operations, and limited gatherings to no more than ten people. As such, many traditional public involvement opportunities, such as fairs, stream cleanups, and other springtime gatherings were prohibited. In addition, the changes in daily and business life have resulted in changes in other areas such as a dramatic decline in usage of public transportation. Ridership on Charlottesville Area Transit declined more than 50% in March 2020 as compared to March 2019. In light of these shifts in behavior, Tables 1 and 2 have been adjusted to address the fact that some previously planned efforts or initiatives may need to be adapted or replaced to adjust to changing public health concerns and public behavior.
<table>
<thead>
<tr>
<th>Strategy Examples</th>
<th>Public Audience</th>
<th>Time Frame Anticipated Frequency</th>
<th>Anticipated Relevant Message (s)</th>
<th>Runoff Volume Reductions</th>
<th>Potential Runoff Pollutants</th>
<th>TMDL Pollutants</th>
</tr>
</thead>
<tbody>
<tr>
<td>Written Materials</td>
<td>Homeowners and residents</td>
<td>Spring Two or Three times during permit cycle</td>
<td>Pick up After Your Pets: Animal waste that is washed off of lawns and sidewalks sends harmful bacteria into the storm drain system and into streams and rivers, creating problems for swimmers and fish.</td>
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<td>Utility Bill Inserts</td>
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<td>Use moderation when applying lawn products such as fertilizers, pesticides or herbicides. Better yet, get your soil tested.</td>
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<td>✓</td>
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<tr>
<td>Media Materials</td>
<td>Homeowners and residents</td>
<td>Winter Once during permit cycle</td>
<td>We all prefer healthy streams and lakes...but most of our local waters are somewhat polluted. When it rains, pollution is carried directly into streams by runoff from parking lots, streets, and lawns. Here’s what YOU can do to reduce pollution: (one) pick up after your pet, (two) don’t over-fertilize your lawn, and (three) capture the water from your rooftop in a rain barrel...or in a rain garden. Do your part to keep our streams clean and healthy. Visit Rivanna-stormwater.org.</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
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<td>Charlottesville Public Access Station PSAs</td>
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<td></td>
<td>Don’t over-fertilize your lawn. Excess nutrients from fertilizer are a major source of water pollution when they are carried by rain runoff into stormdrains and local waterways. Apply fertilizer based on a soil test. Don’t rake leaves down storm drains or into streams.</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
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</table>

MCM#1 – Public Education and Outreach
MCM#2 – Public Involvement and Participation
MS4 Program Plan (2018 – 2023)
<table>
<thead>
<tr>
<th>Written Materials</th>
<th>Homeowners and residents</th>
<th>Fall</th>
<th>While being good to your pet, don't be bad to the river. Every time it rains, runoff from your lawn carries bacteria and other organisms from your pet's waste into local streams. Dispose of your pet's waste properly by bagging it and throwing it away.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Charlottesville Area Transit Bus Ad</td>
<td>Homeowners and residents</td>
<td>Once during permit cycle – may not be utilized if ridership numbers do not warrant the effort</td>
<td></td>
</tr>
<tr>
<td>Media Materials Radio Ads</td>
<td>Homeowners and residents</td>
<td>Summer</td>
<td>Did you know 1 quart of motor oil can contaminate 250,000 gallons of water? Every year in the U.S., millions of gallons of used motor oil, chemicals, and other wastes are disposed of illegally – down a storm drain or in the trash. Unlike sewage, stormwater is not treated. Storm drains empty directly into local streams and eventually reach the Chesapeake Bay. Please do your part to keep our waterways healthy. Recycle used motor oil at the Rivanna Solid Waste Authority’s Ivy location or return it to where you bought it.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Once during permit cycle</td>
<td>Planning to wash your car this weekend? Ever wonder where all that water goes after it runs off your driveway? This water does not get treated and carries oil, soaps, and cleaners into storm drains; it flows directly into local streams and eventually reaches the Chesapeake Bay. To help prevent this, consider using biodegradable cleaning products, and wash your car on the lawn, instead of the driveway. Even better, take your car to a carwash facility that recycles its wash water. Pet waste commonly contains bacteria and parasites harmful to humans and other pets. Waste left on</td>
</tr>
</tbody>
</table>
trails, sidewalks and grassy areas can wash into creeks and lakes, harming aquatic life and making the water unsafe for swimming and wading. Our own Moores Creek has been found to contain harmful levels of E. coli. By picking up after dogs and cats, you can improve local water quality and keep your community safer!

Remember: Always scoop pet waste and dispose of it properly by throwing it in the trash or flushing it down the toilet.

| Alternative Materials | Homeowners and residents | Spring | Once during permit cycle | Hand out magnets regarding cigarette butt litter, picking up pet waste, and proper car washing at Earth Week or other tabling events. May be distributed in other ways should tabling events remain unfeasible or poorly attended. | ✓ | ✓ |
|-----------------------|--------------------------|--------|--------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|    |    |
| Alternative Materials | Homeowners and residents | Spring | Once during permit cycle | Hand out stickers with stormwater focused messaging at Earth Week or other tabling events. May be distributed in other ways should tabling events remain unfeasible or poorly attended. | ✓ | ✓ |
| Media Materials       | Homeowners and residents | Twice Yearly | Annually | Provide stormwater focused social media content to existing local Facebook pages or other social media outlets. Share stormwater video online. | ✓ | ✓ | ✓ |
Table 2. Public Involvement Opportunities

<table>
<thead>
<tr>
<th>Description of public involvement activity</th>
<th>Anticipated time period and frequency</th>
<th>Metric to determine if the activity is beneficial to water quality</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tabling at Earth Day Eco Fair and other Events</td>
<td>2-3 Events <strong>Annually</strong> May be adapted to virtual or other engagement events if public events remain unfeasible or poorly attended</td>
<td>Number of individuals spoken with</td>
</tr>
<tr>
<td>Participant Workshop</td>
<td>Once per permit cycle</td>
<td>Number of workshop attendees</td>
</tr>
</tbody>
</table>
UVA Addendum to 5-yr MS4 Education and Outreach Plan

University of Virginia Initiatives:

1. Background

The purpose of this addendum is to address education and outreach programs specifically targeted the University of Virginia (UVA) community. Educational programs and outreach events are primarily conducted by the University’s Environmental Resources as well as the Clean Water Working Group.

Environmental Resources (ER) within the UVA Facilities Management provides a number of university-wide services including pollution prevention, erosion and sediment control, greenhouse gas monitoring, and stormwater management. ER is responsible for coordination and oversight of all environmental regulatory requirements at UVA. The Clean Water Working Group (CWWG) is a student-led task force that collaborates with ER. The students are given the opportunity and resources to investigate and recommend stormwater practices to reduce UVA’s impacts on local streams and ultimately the Chesapeake Bay. To encourage and promote community involvement, both ER and CWWG engaged in outreach and education directed toward UVA students, staff, faculty, and visitors.

2. High Priority Water Quality Issues

Similar the RSEP’s campaign, UVA’s education and outreach campaigns are designed to help improve local and regional water quality. UVA will focus on the same high-priority water quality issues using the same rationale as those described in the RSEP Outreach and Education Plan.

a. Runoff Volume Reductions

Education on the concepts of stormwater runoff, ways UVA is working to reduce stormwater runoff help students, faculty, staff, and visitors understand the importance of stormwater management.

b. Potential Runoff Pollutants

Potential pollutants at UVA range from cigarette butts and litter at Beta Bridge to runoff from car washing or pet waste. Education around these topics allow members of the UVA community as well visitors to understand how their every-day actions can help or harm their local waterways.

c. TMDL Impairments – Bacteria, Sediment, Nitrogen, Phosphorus
Most sources of TMDL Impairments on UVA property are managed under existing programs, SOPs, or UVA BMP installation. For example, all fertilizer and de-icing material is purchased and applied by UVA staff. Pets are not allowed in most UVA residences. However, visitors to UVA often walk their dogs on or through grounds. Efforts to educate members of the UVA Community and visitors on their impacts on these activities can help produce positive outcomes after they have left UVA.

3. **Student to Student Outreach**

To promote stormwater related events, the CWWG document their projects to update the student body and those that are not in the taskforce but are interested in stormwater issues.

- Facebook page  [https://www.facebook.com/UVACleanWater/](https://www.facebook.com/UVACleanWater/)
- UVA mailing lists including the UVA Sustainability email list and Facebook Page, the Engage@UVA email list, and other email lists targeted toward potential interested student groups such as the Environmental Sciences Organization.

4. **Adjusting target audience and messages to address any observed weaknesses or shortcomings**

The CWWG will review previous campaigns at the start of each semester and new ideas for campaigns will be considered for implementation. Campaigns created by CWWG are anticipated to change from year to year depending on student interest and participation levels. ER will remain involved to provide oversight and work with other UVA departments as needed. Educational efforts and engagement activities described in the tables below will be altered as needed to address different audiences, issues, or may be held at different times than those stated.

5. **Nature of this Addendum**

This plan is intended to be a supplement to the RSEP Public Education and Outreach and Public Involvement and Participation Program Plan. This plan is not intended as a stand-alone document and therefore may not cover all program requirements which have previously been covered in the RSEP Plan. Tables 1 and 2 are intended to serve as guides for potential activities that may occur based on previous student interest levels. Planned activities may be adjusted at any time to reflect student interest and availability.

6. **COVID-19 Pandemic Adjustments**
The COVID-19 pandemic that began in March 2020 created unprecedented changes in daily life and business functions. The Governor of Virginia enacted executive orders which required people to stay at home, forced businesses to adjust or cease operations, and limited gatherings to no more than ten people. UVA students left for spring break in early March and were not allowed to return to UVA, as the remainder of the semester was completed virtually. As such, many traditional public involvement opportunities, such as tabling events for World Water Day, numerous Earth Week events, stream cleanups, Dell tours and other springtime gatherings were prohibited. In addition, other educational material such as signage, storm drain marking, and flyers are ineffective as there are few people to view them.

UVA had already completed enough Table 1 and 2 actives during the fall and spring semester to meet the intention of this Outreach and Education Plan addendum before the COVID-19 pandemic began. However, the long term impacts and changes in behavior are unknown. Tables 1 and 2 will be updated, as needed, to address the fact that some previously planned efforts or initiatives may need to be adapted or replaced to adjust to changing public health concerns and public behavior.
### Table 1. Outreach and Education Strategies

<table>
<thead>
<tr>
<th>Strategy Examples</th>
<th>Public Audience</th>
<th>Time Frame Anticipated Frequency</th>
<th>Anticipated Relevant Message (s)</th>
<th>High Priority Issues Addressed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Written Materials Storm Drain Markers</td>
<td>Students, Faculty, Staff and Visitors</td>
<td>Spring Once during permit cycle</td>
<td>Student created message resulting from design competition reminding those walking by not to pollute runoff going down the storm drain.</td>
<td>Runoff Volume Reductions</td>
</tr>
<tr>
<td>Written Materials Flyers</td>
<td>Students, Faculty, Staff and Visitors</td>
<td>Spring Semester Annually</td>
<td>Design a flyer to promote involvement in CWWG efforts and promote using email, bus posters, or posting of flyers in strategic locations.</td>
<td>Potential Runoff Pollutants</td>
</tr>
<tr>
<td>UVA Stormwater Tours Dell Tours</td>
<td>Students, Faculty, Staff and Visitors</td>
<td>Fall and Spring Semesters Annually</td>
<td>Provide tours of UVA stormwater best management practices to interested community groups, student groups, and classes. Topics covered include runoff volume reductions, runoff pollutants, and how the BMPs treat TMDL pollutants.</td>
<td>TMDL Pollutants</td>
</tr>
</tbody>
</table>

### Table 2. Public Involvement Opportunities

<table>
<thead>
<tr>
<th>Description of public involvement activity</th>
<th>Anticipated time period and frequency</th>
<th>Metric to determine if the activity is beneficial to water quality</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stream Clean Up Events</td>
<td>1 Event Annually</td>
<td>Number of individual participants</td>
</tr>
<tr>
<td>Stormwater Related Design Competition</td>
<td>Once per permit cycle</td>
<td>Estimated number of students viewing the flyer</td>
</tr>
<tr>
<td>Tabling at public fairs or other events</td>
<td>1 Event Annually</td>
<td>Estimated number of visitors</td>
</tr>
</tbody>
</table>
Appendix B
Stormwater Public Education, Outreach, Involvement and Participation Events
<table>
<thead>
<tr>
<th>Date</th>
<th>Activity or Event Title</th>
<th>UVA or RSEP</th>
<th>Audience</th>
<th>Event Description</th>
<th>Education and Outreach?</th>
<th>Involvement and Participation?</th>
</tr>
</thead>
</table>

*this spreadsheet is a placeholder and an example only. A completed version is provided with each annual report*
Appendix C
Reportable Spills
### Results of Investigation
(conditions, nature of IDDE, situation when arrive on site)

### Follow Up Efforts and Resolution
(efforts to find IDDE source, how source was eliminated)

### Describe any follow up to prevent reoccurrence or revisitation of site to ensure IDDE eliminated

### Date investigation closed (education may be ongoing)

### Written Report - yes/no and location

### Reported to DEQ, City, County, EPA

### Who Reported Incident to ER

### Resulted in Release to MS4, reportable quantity?

---

*this spreadsheet is a placeholder and an example only. A completed version is provided with each annual report*
Appendix D
Training Plan
<table>
<thead>
<tr>
<th>Department</th>
<th>Reason Required</th>
<th>Training Type/Objective</th>
<th>Frequency</th>
<th>Means to Achieve Training Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Athletics</td>
<td>6.1.(1) - Field Personnel</td>
<td>Class C UST Operator, Spill Response, IDDE, SOPs</td>
<td>Once every 24 months</td>
<td>Training provided by ER or appropriate designated staff</td>
</tr>
<tr>
<td>John Paul Jones Arena</td>
<td>6.1.(1) - Field Personnel</td>
<td>Spill Response, IDDE, SOPs</td>
<td>Once every 24 months</td>
<td>Training provided by ER or appropriate designated staff</td>
</tr>
<tr>
<td>IM-Rec Sports</td>
<td>6.1.(1) - Field Personnel</td>
<td>Class C UST Operator, Spill Response, IDDE, SOPs</td>
<td>Once every 24 months</td>
<td>Training provided by ER or appropriate designated staff</td>
</tr>
<tr>
<td>Heat Plant</td>
<td>6.1.(1) - Field Personnel</td>
<td>Class C UST Operator, Spill Response, IDDE, SOPs</td>
<td>Once every 24 months</td>
<td>Training provided by ER or appropriate designated staff</td>
</tr>
<tr>
<td>Recycling</td>
<td>6.1.(1) - Field Personnel</td>
<td>Spill Response, IDDE, SOPs</td>
<td>Once every 24 months</td>
<td>Training provided by ER or appropriate designated staff</td>
</tr>
<tr>
<td>Utilities</td>
<td>6.1.(1) - Field Personnel</td>
<td>SPCC Operator, Spill Response, IDDE, SOPs</td>
<td>Once every 24 months</td>
<td>Training provided by ER or appropriate designated staff</td>
</tr>
<tr>
<td>Power and Light</td>
<td>6.1.(1) - Field Personnel</td>
<td>Class C UST Operator, Spill Response, IDDE, SOPs</td>
<td>Once every 24 months</td>
<td>Training provided by ER or appropriate designated staff</td>
</tr>
<tr>
<td>North Grounds Zone</td>
<td>Maintenance</td>
<td>Class C UST Operator, Spill Response, IDDE, SOPs</td>
<td>Once every 24 months</td>
<td>Training provided by ER or appropriate designated staff</td>
</tr>
<tr>
<td>Newcomb Zone</td>
<td>Maintenance</td>
<td>Class C UST Operator, Spill Response, IDDE, SOPs</td>
<td>Once every 24 months</td>
<td>Training provided by ER or appropriate designated staff</td>
</tr>
</tbody>
</table>

*this spreadsheet is a placeholder and an example only. A completed version is provided with each annual report. Some training plans may be modified due to COVID-19 restrictions on in-person gatherings issued by the Governor of Virginia and the UVA President. Any such modifications will be noted in the appropriate annual report.
<table>
<thead>
<tr>
<th>Department</th>
<th>Reason Required</th>
<th>Training Type/Objective</th>
<th>Frequency</th>
<th>Means to Achieve Training Requirement</th>
<th>Date Completed</th>
<th># of Staff Trained</th>
<th>Date Completed</th>
<th># of Staff Trained</th>
<th>Date Completed</th>
<th># of Staff Trained</th>
</tr>
</thead>
<tbody>
<tr>
<td>West Grounds Zone Maintenance</td>
<td>6.1.(1) - Field Personnel</td>
<td>Class C UST Operator, Spill Response, IDDE, SOPs</td>
<td>Once every 24 months</td>
<td>Training provided by ER or appropriate designated staff</td>
<td></td>
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</tr>
<tr>
<td>McCormick Zone Maintenance</td>
<td>6.1.(1) - Field Personnel</td>
<td>Class C UST Operator, Spill Response, IDDE, SOPs</td>
<td>Once every 24 months</td>
<td>Training provided by ER or appropriate designated staff</td>
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<tr>
<td>Central Grounds Zone Maintenance</td>
<td>6.1.(1) - Field Personnel</td>
<td>Class C UST Operator, Spill Response, IDDE, SOPs</td>
<td>Once every 24 months</td>
<td>Training provided by ER or appropriate designated staff</td>
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</tr>
<tr>
<td>FM HSPP Zone 1 Maintenance</td>
<td>6.1.(1) - Field Personnel</td>
<td>Class C UST Operator, Spill Response, IDDE, SOPs</td>
<td>Once every 24 months</td>
<td>Training provided by ER or appropriate designated staff</td>
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</tr>
<tr>
<td>FM HSPP Zone 2 Maintenance</td>
<td>6.1.(1) - Field Personnel</td>
<td>Class C UST Operator, Spill Response, IDDE, SOPs</td>
<td>Once every 24 months</td>
<td>Training provided by ER or appropriate designated staff</td>
<td></td>
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</tr>
<tr>
<td>FM HSPP Zone 3 Maintenance</td>
<td>6.1.(1) - Field Personnel</td>
<td>Class C UST Operator, Spill Response, IDDE, SOPs</td>
<td>Once every 24 months</td>
<td>Training provided by ER or appropriate designated staff</td>
<td></td>
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<tr>
<td>FM HSPP Zone 4 Maintenance</td>
<td>6.1.(1) - Field Personnel</td>
<td>Class C UST Operator, Spill Response, IDDE, SOPs</td>
<td>Once every 24 months</td>
<td>Training provided by ER or appropriate designated staff</td>
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<tr>
<td>FM HSPP Zone 4 Maintenance</td>
<td>6.1.1-(2) - Field Personnel, Street and Parking Lot Maintenance</td>
<td>Class C UST Operator, Spill Response, IDDE, SOPs</td>
<td>Once every 24 months</td>
<td>Training provided by ER or appropriate designated staff</td>
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<tr>
<td>FM HSPP Zone 4 Maintenance</td>
<td>6.1.1-(2) - Field Personnel, Street and Parking Lot Maintenance</td>
<td>Class C UST Operator, Spill Response, IDDE, SOPs</td>
<td>Once every 24 months</td>
<td>Training provided by ER or appropriate designated staff</td>
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<tr>
<td>Renovations</td>
<td>6.1.(1) - Field Personnel</td>
<td>Class C UST Operator, Spill Response, IDDE, SOPs</td>
<td>Once every 24 months</td>
<td>Training provided by ER or appropriate designated staff</td>
<td></td>
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<tr>
<td>Facilities Management Administrative Staff</td>
<td>6.m.(3) - Work around maintenance facility</td>
<td>IDDE</td>
<td>Once every 24 months</td>
<td>Training provided by ER or appropriate designated staff</td>
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<td>Specialty Training</td>
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</tr>
<tr>
<td><strong>FM Pesticide and Herbicide Applicators</strong></td>
<td>6.m.(4) - Pesticide and herbicide applicators</td>
<td>VCACS Certification</td>
<td>As required for certification</td>
<td>VCACS Program Certification Requirements</td>
<td>Certificates maintained per VCACS requirements</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td><strong>Environmental Resources</strong></td>
<td>6.m.(5)-(6) - E&amp;SC and VSMP inspectors</td>
<td>E&amp;SC and SWM Combined Inspector or Administrator</td>
<td>As required for certification</td>
<td>DEQ E&amp;SC and SWM</td>
<td>Certificates maintained per DEQ requirements</td>
<td></td>
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</tr>
<tr>
<td><strong>UVA Police</strong></td>
<td>6.m.(7) - Emergency response</td>
<td>IDDE</td>
<td>Once every 24 months</td>
<td>Officers provide training in-house on UVA emergency response procedures.</td>
<td></td>
<td></td>
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</tr>
<tr>
<td><strong>EHS</strong></td>
<td>6.m.(7) - Emergency response</td>
<td>HAZWOPER</td>
<td>As required for certification</td>
<td>Training by a certified trainer as appropriate. May be in person or online</td>
<td></td>
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</tr>
</tbody>
</table>
Appendix E
High Priority Facility Evaluation
<p>| Location            | Residuals from using, storing, or cleaning machinery or equipment | Materials or residuals from spills or leaks | Material Handling equipment | Materials could be mobilized in stormwater during loading or unloading | Materials stored outdoors | Materials contained in open or leaking drums, barrels, tanks, and similar containers | Water material except in covered, nonleaking containers | Application or disposal of process wastewater | Particulate matter from roof stacks or vents not otherwise regulated | Discharge to MS4 | SWPPP required | Rationale                                                                 |
|---------------------|---------------------------------------------------------------|-------------------------------------------|-----------------------------|---------------------------------------------------------------------|--------------------------|----------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|-------------------------------------------------|-----------------|---------------------------------------------------------------------------|
| FM Yard             | ✓                                                              | ✓                                         | ✓                           | ✓                                                                   | ✓                        | ✓                                                                                      | ✓                                                                                | ✓                                                                                           | ✓                                              | ✓               | Salt storage shed, landscape storage area                                  |
| FM Forestry Yard    | ✓                                                              |                                            |                             |                                                                     |                          |                                                                                       |                                                                                   |                                               |                                                                |                                                               |     | Does not discharge to MS4.                                              |
| FM Fontaine Yard    | ✓                                                              |                                            |                             |                                                                     |                          |                                                                                       |                                                                                   |                                               |                                                                |                                                               |     | Does not discharge to MS4, not in census urbanized area.                 |
| Recycle Sort Facility |                                                            |                                            |                             |                                                                     |                          |                                                                                       |                                                                                   |                                               |                                                                |                                                               |     | Recyclable materials are waste and stored in large quantities, even if under cover. |
| Main Heat Plant     | ✓                                                              | ✓                                         |                             |                                                                     |                          |                                                                                       | ✓                                                                                | ✓                                                                                           | ✓                                              | ✓               | Historic number of large spills and potential for releases to air.       |
| Athletics Precinct  | ✓                                                              | ✓                                         | ✓                           | ✓                                                                   | ✓                        | ✓                                                                                      | ✓                                                                                | ✓                                                                                           | ✓                                              | ✓               | Materials now largely stored under cover due to new facilities.          |
| Scott Stadium       |                                                              |                                            |                             |                                                                     |                          |                                                                                       | ✓                                                                                | ✓                                                                                           | ✓                                              |                                                            | Not a high priority facility. Only issues come from power washing and an SOP has been developed. |
| Cambell Hall        |                                                              |                                            |                             |                                                                     |                          |                                                                                       | ✓                                                                                | ✓                                                                                           | ✓                                              |                                                            | Not a high priority facility. New equipment and SOP developed for concrete work outside has reduced potential for discharge. |
| Ruffin Hall         |                                                              |                                            |                             |                                                                     |                          |                                                                                       | ✓                                                                                | ✓                                                                                           | ✓                                              |                                                            | Not a high priority facility. Work outside has little potential for discharge.            |</p>
<table>
<thead>
<tr>
<th>Location</th>
<th>Residuals from using, storing, or cleaning machinery or equipment</th>
<th>Materials or residuals from spills or leaks</th>
<th>Material Handling equipment</th>
<th>Materials could be mobilized in stormwater during loading or unloading</th>
<th>Materials stored outdoors</th>
<th>Materials contained in open or leaking drums, barrels, tanks, and similar containers</th>
<th>Water material except in covered, nonleaking containers</th>
<th>Application or disposal of process wastewater</th>
<th>Particulate matter from roof stacks or vents not otherwise regulated</th>
<th>Discharge to MS4</th>
<th>SWPPP required</th>
<th>Rationale</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fontaine Composting Site</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Not a high priority facility. No potential to discharge observed.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>North Grounds Mechanical Plant</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Hospital Loading Dock and West Complex</td>
<td></td>
<td></td>
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<td></td>
<td></td>
<td></td>
<td>Not a high priority facility. No potential to discharge observed.</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Copeley Substation</td>
<td></td>
<td></td>
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<td></td>
<td></td>
<td></td>
<td>Not a high priority facility. No potential to discharge observed.</td>
<td></td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>


Appendix F
TMDL Action Plans and Annual Updates
Updates to the Chesapeake Bay TMDL and applicable local TMDL action plans will be provided with each annual report.

Local TMDL Action Plans for the following applicable TMDLS are available on the UVA website:

Chesapeake Bay TMDL - Revised September 24, 2019
Rivanna River Combined Benthic and Bacteria TMDL - May 1, 2020
Moores Creek, Lodge Creek, Meadow Creek, and Schenks Branch Sediment TMDL - April 30, 2021