

Municipal Separate Storm Sewer System (MS4) Program Plan

Stafford County, Virginia



Developed in compliance with:

Virginia Pollutant Discharge Elimination System (VPDES) General Permit for Stormwater Discharges from Small MS4, Effective Date November 1, 2018

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SIGNATORY AUTHORIZATIONS

Part III K. of the Virginia Pollutant Discharge Elimination System General Permit for Discharges of Stormwater from Small Municipal Separate Storm Sewer Systems establishes signatory requirements for the submission of registration statements, reports and other information.

The following positions are authorized under Part III K to sign all registration statements, reports and other information:

- Principal Executive Officer¹
- Ranking Elected Official

In addition, the aforementioned officials are permitted to provide authorization for other “persons” to sign reports required by state permits, including annual reports, and other information requested by the State Water Control Board or Department of Environmental Quality. Other “persons” are considered duly authorized to sign these reports and other information only if:

1. Authorization is made in writing by either a principal executive officer or a ranking elected official;
2. The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the operator. (A duly authorized representative may thus be either a named individual or any individual occupying a named position.); and
3. The signed and dated written authorization is submitted to the Department of Environmental Quality.

Stafford County Duly Authorized Positions

In accordance with Part III K of the Virginia Pollutant Discharge Elimination System General Permit for Discharges of Stormwater from Small Municipal Separate Storm Sewer Systems, the following Stafford County positions (job titles) are duly authorized to sign reports and other information requested by the State Water Control Board or the Department of Environmental Quality:

_____	_____
_____	_____
_____	_____

This authorization is provided by

Name _____ Signature _____

Title _____ Date _____

¹ A principal executive officer of a public agency is defined as the chief executive officer of the agency or a senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency.

MS4 PROGRAM PLAN CERTIFICATION

As required by the VPDES General Permit for Stormwater Discharges from Small MS4s (MS4 General Permit), Part III 4.

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

Name _____ Signature _____

Title _____ Date _____

ACRONYMS

The following acronyms are utilized throughout the MS4 Program Plan

BMP	Best Management Practice
CBPA	Chesapeake Bay Preservation Act
CRRL	Central Rappahannock Regional Library
CWA	Federal Clean Water Act
CWP	Northern Virginia Regional Commission – Clean Water Partners
DEQ	Virginia Department of Environmental Quality
DH-ESS	Department of Health – Environmental Services Section
DPU	Stafford County Department of Utilities
DPW	Stafford County Public Works Department
DPW-EP	Stafford County Department of Public Works – Environmental Division
DPZ	Stafford County Planning and Zoning
EPA	United States Environmental Protection Agency
F&R	Stafford County Fire and Rescue
FOR	Friends of the Rappahannock
GIS	Geographic Information System
GWRPC	George Washington Regional Planning Commission
HHW	Household Hazardous Waste
HUC	Hydrologic Unit Code
I&M Procedures	Inspection and Maintenance Procedures
IDDE	Illicit Discharge Detection and Elimination
IT	Stafford County Information and Technology Department
MCM	Minimum Control Measure
MEP	Maximum Extent Practicable
MOU	Memorandum of Understanding
MS4	Municipal Separate Storm Sewer System
NMP	Nutrient Management Plan
NPDES	National Pollutant Discharge Elimination System
NVRC	Northern Virginia Regional Commission
PEOP	Public Education and Outreach Program Plan
POC	Pollutants of Concern
POTW	Publicly Owned Treatment Works

PRCF	Stafford County Parks, Recreation and Community Facilities
PY	Permit Year
R-Board	Rappahannock Regional Solid Waste Management Board
Reference Library	MS4 Program Plan Reference Library
SO	Sherriff's Office
SOPs	Standard Operating Procedures
SWM	Stormwater Management
SWPPP	Stormwater Pollution Prevention Plans
TCWCD	Tri-County/City Soil and Water Conservation District
TMDL(s)	Total Maximum Daily Load(s)
UA	United States Census Bureau Urbanized Area
US	United States
VAC	Virginia Administrative Code
VCE	Stafford County Cooperative Extension
VDACS	Virginia Department of Agriculture and Consumer Services
VESCP	Virginia Erosion and Sediment Control Program
VPDES	Virginia Pollutant Discharge Elimination System
VSMP	Virginia Stormwater Management Program

CHAPTER 1. INTRODUCTION

Municipal Separate Storm Sewer Systems (MS4s) are conveyances or a system of conveyances owned and operated by government entities that are designed or used in the collection or conveyance of stormwater runoff and are not part of a combined sewer or part of a Publicly Owned Treatment Works (POTW). Modifications to the federal Clean Water Act (CWA) in 1987 classified discharges from MS4s as point-source discharges and initiated a phased regulatory approach to require MS4 operators to obtain National Pollutant Discharge Elimination System (NPDES) permit coverage for their MS4 discharges. Under the first phase of NPDES permit implementation, localities that were specifically identified in the federal regulations adopted as a result of the CWA modifications were required to obtain individual NPDES permits. As part of the second phase of NPDES permit implementation, operators of small MS4s were required to obtain NPDES permit coverage. Small MS4s are defined primarily as MS4s located within an Urbanized Area (UA) identified delineated as part of the latest United States (US) Census.



Figure 1. Stafford County MS4 Outfall Node ID: CO-RPR(1)1 located off Village Parkway

1.1 MS4 Permitting in Virginia

The Commonwealth of Virginia has been authorized by the US Environmental Protection Agency (EPA) to implement the NPDES program within its jurisdictional boundaries. As such, the State Water Control Board (SWCB) issued its first Virginia Pollutant Discharge Elimination System (VPDES) General Permit for Stormwater Discharges from Small MS4s in 2003 (MS4 General Permit), under which small MS4 operators obtained coverage and agreed to comply with the conditions set out within it regarding discharges. As a general permit, the MS4 General Permit has a five-year permit cycle, upon which the SWCB must reissue a new general permit under which small MS4 operators must reapply for coverage and agree to apply with the conditions contained in the new permit. In 2018, DEQ reissued the latest version of the MS4 General Permit containing a revised slate of permit conditions that small MS4 operators must comply with in order to remain in compliance with the federal CWA and the State Water Control Law.

1.2 MS4 Permitting and Stafford County

Stafford County, Virginia (County) encompasses approximately 277 square miles within the Interstate 95 corridor just north of the City of Fredericksburg, VA. Northern portions of the County have been determined to fall within the Washington DC-VA-MD UA boundaries; whereas southern portions of the County fall within the Fredericksburg, VA UA. UA boundaries, which are population and population density based, change with completion of each decennial US Census. The portions of the County located within an UA as a result of the 2010 US Census are mapped in Figure 2.

The County has retained coverage under the MS4 General Permit since the State’s initial permit in 2003. During such time, the County has successfully implemented numerous best management practices (BMPs), activities and strategies to meet the conditions in each successive permit. In 2018, the County submitted a complete Registration State for Permit Coverage to obtain coverage under the most recent MS4 General Permit. The County received its Notice of Coverage under the MS4 General Permit on October 29, 2018.

By applying for, and receiving coverage, under the MS4 General Permit, the County has agreed to comply with its conditions and authorizations regarding discharges from the County’s MS4. This includes the development, implementation and enforcement of an MS4 Program that is designed to reduce the discharge of pollutants from the small MS4 to the maximum extent practicable (MEP) in accordance with the MS4 General Permit, to protect water quality and to satisfy the appropriate water quality requirements of the State Water Control Law and its attendant regulations. The MS4 Program Plan, established here, defines the means and methods that the County will utilize to meet these overarching requirements.

1.3 The Current MS4 General Permit

The current MS4 General Permit, which is also a state regulation found at 9VAC25-890 et. seq. of the Virginia Administrative Code (VAC), became effective November 1, 2018 and will expire on October 31, 2023. The MS4 General Permit provides the County authorization to discharge stormwater from its MS4 provided conditions contained in the permit are met. The MS4 General Permit applies to all discharges from County owned or operated storm drainage conveyances located within the latest decennial U.S. Census (2010). The MS4 General Permit is the legal authority upon which County compliance will be determined. Failure to meet the conditions and requirements contained in the MS4 General Permit can lead to State or Federal authorities initiating compliance action against the County. The CWA also allows third-parties to utilize Citizen’s Suits to ensure County compliance in case of alleged non-compliance.

The MS4 General Permit is divided into three Parts: Part I – Discharge Authorization and Special Conditions; Part 2 – TMDL Special Conditions; and Part III – Conditions Applicable to all State and VPDES Permits. Part I of the MS4 General Permit contains the requirement to develop, implement and enforce

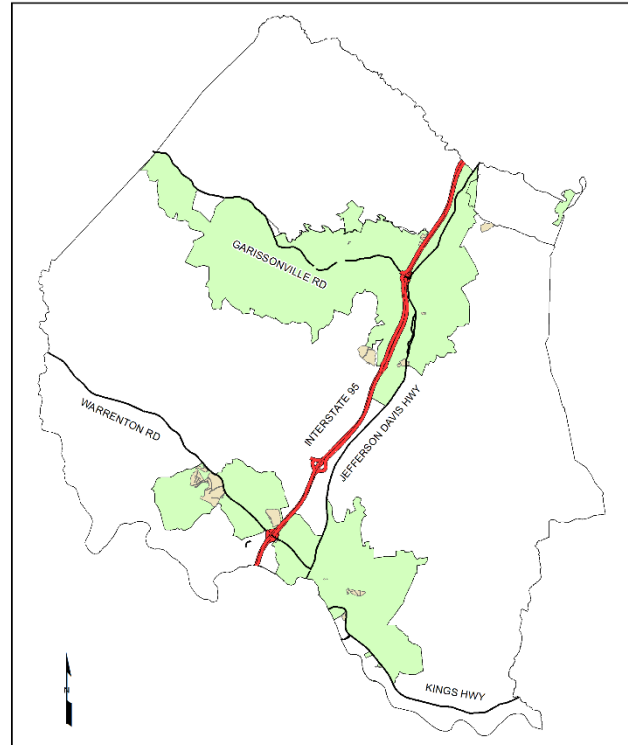


Figure 2. Portions of Stafford County located within 2010 U.S. Census Urbanized Areas (shaded in green)

The MS4 General Permit applies to all discharges from County owned or operated storm drainage conveyances located within the latest decennial U.S. Census (2010).

a MS4 Program designed to reduce the discharge of pollutants from the small MS4 to the maximum extent practicable (MEP) in accordance with this permit, to protect water quality, and to satisfy the appropriate water quality requirements of the State Water Control Law and its attendant regulations of the Commonwealth of Virginia to control discharges to and from the MS4. The MS4 Program Plan and Annual Reporting requirements are included in Part I, along with the six (6) Minimum Control Measures (MCMs). The MCMs are the six (6) stormwater pollution prevention measures expected of MS4 Programs operated by small MS4 operators, such as the County. The MCMs are:

- Public Education and Outreach
- Public Involvement and Participation
- Illicit Discharge Detection and Elimination
- Construction Site Stormwater Runoff Control
- Post-Construction Stormwater Management for New Development and Development on Prior Developed Lands
- Pollution Prevention and Good Housekeeping for Facilities Owned and Operated by the County within the MS4 Service Area

Along with the minimum requirements for each MCM, Part I contains conditions that require development and implementation of an MS4 Program Plan and submission of annual reports to DEQ.

Part II of the MS4 General Permit contains special conditions that define how the County is required to address applicable Total Maximum Daily Loads (TMDLs). The MS4 General Permit contains two special conditions, both of which are applicable to the County. Part II.A. is the Chesapeake Bay TMDL Special Condition, which is applicable to all MS4s located in the Chesapeake Bay watershed. Part II.B. is the Local TMDL Special Condition, which is applicable to MS4s that discharge into a waterbody that does not meet water quality standards due to excessive pollution and for which a TMDL has identified the MS4 as a source of the contributing pollutant.

Part III of the MS4 General Permit contains the standard VPDES permit conditions including, but not limited to, records retention, reporting of unauthorized discharges and unusual discharges, signatory requirements, certification requirements, and authorization for DEQ entry to conduct inspections.

The conditions and requirements included in the MS4 General Permit have been incorporated into the County's MS4 Program Plan to provide the County guidance in complying with the permit. The concept of reducing the pollutant loads in MS4 discharges and protecting water quality to the MEP is an iterative process based on continued implementation, review and revision of the MS4 Program and associated MS4 Program Plan. MS4 Program revisions must be incorporated into the MS4 Program Plan to continue to provide up to date guidance regarding the County's iterative process.

The official version of the MS4 General Permit is found at

<https://law.lis.virginia.gov/admincode/title9/agency25/chapter890/>. For ease in reference in the MS4 Program Plan, a copy of the MS4 General Permit, with non-applicable Chesapeake Bay TMDL watershed tables removed, is included in the MS4 Program Plan as Appendix 1 and contains continuous line numbering along the left-hand column.

CHAPTER 2. MS4 PROGRAM PLAN

2.1 Purpose of the MS4 Program Plan

DEQ will evaluate the County's MS4 Program compliance against the conditions and requirements of the MS4 General Permit. The purpose of the MS4 Program Plan is to provide and maintain a clear and concise description of how the County will administer its MS4 Program to comply with the conditions of the MS4 General Permit.

2.2 The MS4 Program Plan Contents

The MS4 Program Plan contains seven chapters and numerous appendices.

- Chapter 1 provides an outline of the regulatory history of the MS4 Program, its applicability to the County and describes the current MS4 General Permit requirements.
- Chapter 2 introduces the MS4 Program Plan, its contents and relationship to other County programs.
- Chapter 3 defines the administrative distribution of effort and requirements to implement the County's MS4 Program through the MS4 Program Plan as well as describes the legal authorities employed.
- Chapter 4 provides the County's committed efforts to address the MCMs contained in Part I of the MS4 General Permit. For each MCM, Chapter 3 includes
 - Discussion on the MS4 General Permit requirements
 - Identification and discussion on the County-selected BMPs and strategies to meet the MS4 General Permit conditions
 - Specific compliance dates and schedules contained in the MS4 General Permit
 - Annual reporting requirements
- Chapter 5 describes the County's commitments to comply with Part II of the MS4 General Permit regarding TMDL Special Conditions.
- Chapter 6 identifies the measurable goals by which the County will evaluate the MS4 Program and each individual MCM efforts for effectiveness and how effectiveness will be assessed.
- Chapter 7 provides the mechanism for documenting MS4 Program Plan updates made throughout the MS4 General Permit lifespan.
- Appendices

The purpose of the MS4 Program Plan is to provide and maintain a clear and concise description of how the County will administer its MS4 Program to comply with the conditions of the MS4 General Permit.

2.3 MS4 Program Plan Reference Library

Successful implementation of the MS4 Program Plan relies on the development of numerous policies and procedures as well as their periodic review, evaluation and update. All materials and documents referenced in the MS4 Program Plan are included in the digital MS4 Program Plan Reference Library (Reference Library) maintained by the Stafford County Department of Public Works – Environmental Division (DPW-EP). A list of the documents and materials included in the Reference Library are found in Appendix 2. Current document and materials, as well as an up-to-date list that identifies current versions including applicable effective and expiration dates, are available by accessing the Reference Library. Material and document versions are identified using the YYMMDD format, consisting of the applicable year (YY), the applicable month (MM) and the applicable day (DD).

2.4 MS4 Program Plan Updates

While compliance with the MS4 General Permit is an iterative process, the MS4 Program Plan is intended to provide guidance to the County on maintaining this compliance in conjunction with its daily operations. As such, revisions to the MS4 Program Plan are expected throughout the five-year MS4 General Permit cycle. Revisions to the MS4 Program Plan must be documented and reported to DEQ as part of the required MS4 Annual Report. Additionally, effort must be made to ensure that affected County staff are informed of MS4 Program Plan modifications when the revisions may impact day-to-day operations.

To ensure that County employees impacted have access to the up-to-date materials and documents, the current information must be maintained in the Reference Library. In order to ensure this, DPW-EP must:

- Identify the newly developed or modified document or material using the YYMMDD format to identify that it is the current version.
- Replace the previous document or material with the new document or material in the Reference Library.
- Document the update of the MS4 Program Plan as directed in Chapter 7.
- Notify impacted County Departments or Partner Organizations of the newly developed or modified document, material or MS4 Program Plan element.

2.5 MS4 Program Plan and its Relationship to Other County Programs

The MS4 Program Plan provides the linchpin between County programs and the MS4 General Permit conditions. While MS4 General Permit conditions and requirements are applicable to all County activities and actions, all County activities and actions are not implemented solely to address the MS4 General Permit requirements. Similarly, individual activities and actions are often impacted by additional regulatory mandates that influence how they are completed. As such, the MS4 Program Plan has identified the roles, responsibilities and efforts undertaken to comply with MS4 General Permit conditions, such as implementation of standard operating procedures (SOPs), while also identifying the existing County programs applicable for meeting MS4 General Permit requirements, such as the County's Local Virginia Erosion and Sediment Control Program (VESCP).

CHAPTER 3. ADMINISTRATION OF THE STAFFORD COUNTY MS4 PROGRAM PLAN

As previously discussed, the conditions and requirements contained in the MS4 General Permit for discharges from the County’s MS4 are applicable to all discharges from County owned or operated storm drainage conveyances located within the latest decennial US Census. Chapter 2 describes the roles and responsibilities of County departments, agencies and partners in administering the MS4 Program Plan.

3.1 Summary of Roles and Responsibilities

All County departments and agencies share responsibility in ensuring that their individual department’s activities and actions are compliant with these MS4 General Permit requirements. Administrative oversight of the County’s efforts is assigned to the DPW-EP. The DPW-EP’s administrative responsibilities include coordination with and providing aid other County departments and agencies in implementation of the MS4 Program Plan; implementation of the specific portions of the MS4 Program Plan where it has been identified as responsible; and documentation, evaluation and reporting the County’s overall MS4 General Permit compliance efforts to the DEQ.

The DPW-EP can be contacted as follows:

Physical Address

2126 Jefferson Davis Highway
Suite 203
Stafford, VA 22554

Mailing Address

P.O. Box 339
Stafford, VA 22555-0339

Phone

(540) 658-8830

Webpage

<https://staffordcountyva.gov/998/Environmental>

3.1.1 **Stafford County Departments**

While a significant portion of MS4 General Permit compliance efforts are the responsibility of DPW-EP, other County departments and agencies have specific roles in the County’s MS4 General Permit compliance efforts. These specific department roles are summarized in Table 1.

Table 1. Department, Specific MS4 Compliance Role Description and Applicable BMPs

Department	MS4 Program Plan Implementation Role	
	Description	Applicable BMPs
County Administrator’s Office	The County administrator provides administrative support to ensure necessary resources and inter-departmental cooperation is secured.	All
County Attorney Office	The County Attorney’s Office provides legal assistance in enforcement of County ordinances utilized to implement the MS4 Program Plan and reviews contracts and other legal documents to ensure legal documents are consistent with the County’s MS4 Program Plan.	3.3; 4.1; 5.1; 6.5

Department	MS4 Program Plan Implementation Role	
	Description	Applicable BMPs
Fire and Rescue (F&R)	F&R assists in minimizing the impact of illicit discharges from spills and releases; implements applicable Pollution Prevention SOPs as part of daily operations and ensures applicable employee/contractor training are met.	3.3; 6.1; 6.4
Information and Technology Department (IT)	IT assists DPW-EP in the upkeep and maintenance of asset management and geographic information system (GIS) data.	3.1 and upon request
Parks, Recreation and Community Facilities (PRCF)	PRCF conducts required maintenance on County stormwater management (SWM) facilities, implements Pollution Prevention SOPs as part of daily operations, implements stormwater pollution prevention plans (SWPPPs) at high-priority County facilities, nutrient management plans (NMPs) at County facilities and ensures applicable employee/contractor training requirements included in the Training Plan are met.	2.2; 5.2; 5.3; 6.1; 6.2; 6.3; 6.4
Department of Planning and Zoning (DPZ)	DPZ provides outreach to the development community regarding stormwater regulatory requirements and ensures applicable employee/contractor training requirements included in the Training Plan are met.	1.1; 6.4
Department of Public Works (DPW)	DPW implements Pollution Prevention SOPs as part of daily DPW operations and ensures applicable employee/contractor training requirements included in the Training Plan are met.	5.2; 5.3; 6.4
County Sheriff's Office (SO)	SO ensures applicable employee/contractor training requirements included in the Training Plan are met.	6.4
Department of Utilities (DPU)	DPU assists in minimizing the impact of illicit discharges from utility infrastructure, implements Pollution Prevention SOPs as part of daily DPU operations and ensures applicable employee/contractor training requirements included in the Training Plan are met.	3.3; 5.2; 5.3; 6.1; 6.4

3.1.2 Partner Organizations

The County partners with numerous public organizations to provide local government services to its residents in the most economic and efficient manner. These partnerships are part of a broader local government services provision mechanism and not specifically for implementing MS4 General Permit control measures. Partner organizations, along with their relationship to the County and their role in MS4 Program Plan implementation are contained in Table 2.

Table 2. Partner Organizations and their Potential Involvement in Stafford County MS4 Program Plan Implementation

Organization	Relationship	MS4 Program Implementation Role	
		Description	Applicable BMPs
Central Rappahannock Regional Library (CRRL)	Through County funding, CRRL provides regional library services to County residents.	CRRL provides a public location for the distribution of traditional public education and outreach materials.	1.1
Department of Health – Environmental Services Section (DH-ESS)	DH-ESS is the local office of the State Department of Health.	DH-ESS is the legal authority for ensuring that private sanitary sewer systems function properly when such systems are found to be discharging into the MS4.	3.3
Friends of the Rappahannock (FOR)	FOR is a local non-profit organization whose role specific to the MS4 Program is outlined in the County’s MOU with FOR.	FOR implements portions of the public education and outreach and public participation programs as outlined by the annually renewed MOU between FOR and the County.	1.1; 2.2
George Washington Regional Planning Commission (GWRPC)	GWRPC is the regional planning district commission that includes the County.	GWRPC engages in community education and outreach activities applicable to the County’s public education and outreach and public involvement needs. Specific activities are identified annually.	1.1
Northern Virginia Regional Commission (NVRC)	NVRC partners with the County and whose role specific to the MS4 Program is in the County’s Memorandum of Understanding (MOU) ² with NVRC.	NVRC administers the Clean Water Partners (CWP) Only Rain Down the Drain regional stormwater education initiative.	1.1; 2.2
Rappahannock Regional Solid Waste Management Board (R-Board)	R-Board is a joint landfill and recycling operational venture between Stafford County and the City of Fredericksburg.	R-Board implements the Household Hazardous Waste Collection Program for County residents.	1.1; 2.2

² Copies of MOUs implemented with Partner Organizations are maintained in the Reference Library

Organization	Relationship	MS4 Program Implementation Role	
		Description	Applicable BMPs
Stafford County Cooperative Extension (VCE)	VCE is the local office of Virginia’s land grant colleges that provides access to educational programs for Stafford County residents and to which the County provides funding.	VCE engages in community education and outreach activities applicable to the County’s public education and outreach and public involvement needs. VCE also implements the Smart Green Lawns Program for County residents.	1.1; 2.2
Tri-County/City Soil and Water Conservation District (TCSWCD)	TCSWCD is a local political subdivision of the Commonwealth of Virginia that receives County funding and whose role specific to the MS4 Program is outlined in the County’s MOU with TCSWCD.	TCSWCD engages in community education and outreach activities applicable to the County’s public education and outreach and public involvement needs. Specific activities are identified annually.	1.1

3.2 Legal Authorities

The County has secured the necessary legal authorities to implement this MS4 Program Plan utilizing the Chapters of the Stafford County Code of Ordinances identified in Table 3.

Table 3. Legal Authorities

Chapter	MS4 Program Plan Applicability
Chapter 5 – Animals	Chapter 5, Section 5-36 prohibits dogs to defecate on public property without the dog owner immediately removes and properly disposes of the waste.
Chapter 11 – Erosion and Sediment Control	Chapter 11 provides legal authority for the implementation of a local Virginia Erosion and Sediment Control Program (VESCP).
Chapter 21.5 – Stormwater Management	Chapter 21.5, Article 1 provides legal authority for the implementation of a local Virginia Stormwater Management Program (VSMP).
	Chapter 21-5, Article 2 prohibits illicit discharges and illegal dumping.
Chapter 27B – Chesapeake Bay Preservation Area	Chapter 27B enacts Chesapeake Bay Preservation Act (Code of Virginia § 62.1-44.15:67 et seq.) into County Ordinance.

The most current available version of the Stafford County Code of Ordinances is available at www.municode.com.

The County has developed policy, procedure and guidance (materials and documents) based on the authorities provided by the legal authority provided by County ordinance. Materials and documents required for the successful implementation of the MS4 Program Plan are identified throughout this program plan and are referenced both in the applicable MS4 Program Plan Chapter and the Reference Library

Materials and documents required for the successful implementation of the MS4 Program Plan are identified throughout the MS4 Program Plan. Current versions of the referenced materials and documents are maintained by DPW-EP in the Reference Library.

3.3 Specifically Identified MS4 General Permit Compliance Dates and Schedules

The MS4 General Permit contains both annual compliance dates and schedules, which occur each year, and dates and schedules specific to one permit condition. The dates and schedules specific to individual permit conditions are both identified in the applicable MS4 Program Plan Chapters.

3.4 MS4 Annual Reporting to the Department of Environmental Quality

As a condition of the MS4 General Permit, the County is required to submit an MS4 Annual Report to the DEQ no later than October 1 of each year. Each MS4 Annual Report is required to include information specified throughout the MS4 General Permit regarding the County’s compliance accomplishments completed between the previous July 1 and June 30 as identified in Table 4.

Table 4. Permit Year Reference Dates

Permit Year (PY)	PY Reporting Period		Annual Report Due Date	Responsible County Department
	Begins	Ends		
PY01	July 1, 2018	June 30, 2019	October 1, 2019	DPW-EP
PY02	July 1, 2019	June 30, 2020	October 1, 2020	DPW-EP
PY03	July 1, 2020	June 30, 2021	October 1, 2021	DPW-EP
PY04	July 1, 2021	June 30, 2022	October 1, 2022	DPW-EP
PY05	July 1, 2022	June 30, 2023	October 1, 2023	DPW-EP

Each MS4 Annual Report is required to include the following information

- The permittee, system name and permit number
- The reporting period for which the MS4 Annual Report is being submitted
- A signed certification³ by a principal executive officer, ranking elected official or an individual employed in a duly authorized position
- Each annual reporting item specified in one of the six MCM
- An evaluation of the MS4 program implementation, including a review of each MCM, to determine the MS4 Program's effectiveness and whether changes to the MS4 Program Plan are necessary⁴
- A status report on the implementation of the Chesapeake Bay TMDL Action Plan including the specific reporting requirements identified in the MS4 General Permit Special Condition Part II A.
- A statute report on the implementation of the Bacterial TMDL for the Tidal Freshwater Rappahannock River Watershed including the specific reporting requirements identified in the MS4 General Permit Special Condition Part II B.
- A summarized list of MS4 Program Plan modifications.

3.5 Duty to Reapply for Continued MS4 General Permit Coverage

Per the MS4 General Permit, Part III M, the County must submit a new Registration Statement to DEQ before Wednesday, August 2, 2023, unless a later date has been granted by the State Water Control Board.

³ All persons signing a document for which a signature is required must make the following certification, "*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*"

⁴ In accordance with the MS4 General Permit, the MS4 Program Plan and all MS4 Annual Reports are to be maintained separately. Proposed modifications identified and listed in a MS4 Annual Report must be incorporated separately into a revised MS4 Program Plan.

CHAPTER 4. ASSURING COMPLIANCE WITH MINIMUM CONTROL MEASURES

The six (6) MCMs in the MS4 General Permit form its backbone and make up the basics of what is required in the County's MS4 Program and MS4 Program Plan. Each MCM requires the County to address several specific requirements throughout the MS4 General Permit cycle. Chapter 4 contains the following for each of the six (6) MCMs:

- MS4 General Permit compliance requirements
- Selected County BMPs and strategies
- Compliance dates/schedules
- Annual reporting requirements

In addition, the MS4 General Permit requires the County to utilize measurable goals to evaluate the progress and effectiveness of the selected County BMPs and strategies in meeting the MCM requirements as well as the overarching requirement to "reduce the discharge of pollutants from the small MS4 to the MEP in accordance with this permit, to protect water quality, and to satisfy the appropriate water quality requirements of the State Water Control Law and its attendant regulations." The measurable goals and methods for evaluating the County's progress are addressed in the MS4 Program Plan, Chapter 6.

4.1 Minimum Control Measure 1 – Public Education and Outreach (MCM #1)

MCM #1 details the expectations and requirements of the County's efforts to increase public knowledge and awareness regarding stormwater pollution, anthropogenic impacts to water quality and local water quality concerns.

4.1.1 MS4 General Permit Compliance Requirements

Under the MS4 General Permit, the County is required to implement a public education and outreach program (PEOP) that is designed to:

- 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.

To address requirements associated with MCM #1, County must identify no less than three (3) high-priority stormwater issues to address in meeting the abovementioned goals. The PEOP associated with the high-priority stormwater issues must:

- 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.

A summary of the MCM #1 Permit Conditions are found in Table 5.

Table 5. Summary of MS4 General Permit Conditions for MCM #1

Summary of the MS4 General Permit MCM #1 Permit Conditions	Specific MS4 General Permit Language (Appendix 1 Line Numbers)
The County shall implement a public education and outreach program.	303-336
The County shall identify no less than three high-priority stormwater issues to meet the goal of educating the public.	311-314
<p>The County shall use two or more strategies of the following strategies per year to communicate to the public the high-priority stormwater issues:</p> <ul style="list-style-type: none"> ▪ Traditional written materials, including but not limited to, informational brochures, newsletters, fact sheets, utility bill inserts or recreational guides for targeted groups of citizens. ▪ Alternative materials, including but not limited to, bumper stickers, refrigerator magnets, t-shirts, or drink koozies. ▪ Signage, including but not limited to, temporary or permanent signage in public places or facilities, vehicle signage, bill boards or storm drain stenciling. ▪ Media materials, including but not limited to, information disseminated through electronic media, radio, televisions movie theaters or newspapers ▪ Speaking engagements, including but not limited to presentations to school, church, industry, trade, special interest, or community groups. ▪ Curriculum materials, including but not limited to, materials developed for school-aged children, students at local colleges or universities, or extension classes offered to local citizens. ▪ Training materials including but not limited to materials developed to disseminate during workshops offered to local citizens, trade organizations, or industrial officials. 	320-321
<p>The MS4 Program Plan must include:</p> <ul style="list-style-type: none"> ▪ A list of the high-priority stormwater issues the permittee will communicate to the public as part of the public education and outreach program. ▪ The rationale for selection of each high-priority stormwater issue and an explanation of how each education or outreach strategy is intended to have a positive impact on stormwater discharges. ▪ Identification of the public audience to receive each high-priority stormwater message. ▪ The strategies from the MS4 General Permit Table 1 that are to be used to communicate each high- priority stormwater message. ▪ The anticipated time periods the messages will be communicated or made available to the public. 	324-332

4.1.2 Selected County BMPs and Strategies

The County has identified 1) pet wastes, 2) residential lawn care, and 3) illicit discharges as the three (3) high-priority stormwater issues to address as part of its PEOP. The County selected pet wastes as a high-

priority stormwater issue due to the fact that pet wastes are known to contain high volumes of bacteria and the 2016 305(b)/303(d) Water Quality Assessment Integrated Report identified bacteria as a cause of impairment for numerous receiving waters downstream of the County’s MS4 service area in both the Potomac River and Rappahannock River basins. The County selected residential lawn care as a high-priority stormwater issue due to the fact that improper nutrient application on residential lawns has been identified as a source of nutrients that contribute to the Chesapeake Bay impairments. The County selected illicit discharges, in general, as a high-priority stormwater issue due to the fact that eliminating illicit discharges has been identified by EPA as one of the six (6) MCMs necessary for MS4 operators to implement in order to reduce pollutants from MS4s to the MEP. The County will implement BMP #1.1 to meet the requirements contained in the MS4 General Permit for MCM #1.

BMP #1.1 – Implementation of the Stafford County Public Education and Outreach Program Plan

The County has developed Stafford County Public Education and Outreach Program Plan (PEOP) to guide implementation of its public education and outreach program. The PEOP identifies the list of specific strategies, partnerships, events and materials that the County will utilize to meet the MS4 General Permit MCM #1 permit conditions. Additional information regarding the Public Education and Outreach Program and the PEOP is available from the DPW-EP. The DPW-EP contact information is found in Chapter 3.1.

Roles and Responsibilities

- DPW-EP is responsible for coordinating implementation of the PEOP with the applicable partners and ensuring that the latest version of the PEOP is available to the public via the County’s Environmental webpage. DPW-EP is also responsible for ensuring that a minimum of two (2) or more strategies are used annually to communicate with the public.

Necessary Reference Materials and Documents

- Public Education and Outreach Plan
- NVRC Memorandum of Understanding
- FOR Memorandum of Understanding

4.1.3 Specifically Identified MS4 General Permit Compliance Dates and Schedules

- N/A

4.1.4 Annual Reporting Requirements

The MS4 General Permit requires that the items specific to MCM #1 identified in Table 6 be reported as part of the MS4 Annual Report.

Table 6. MS4 Annual Report Reporting Item Requirements Specific to MCM #1

MCM #1 Required MS4 Annual Report Reporting Item
A list of the high-priority stormwater issues the permittee addressed in the public education and outreach program
A list of the strategies used to communicate each high-priority stormwater issue

4.2 Minimum Control Measure 2 – Public Involvement and Participation (MCM #2)

MCM #2 is designed to both keep the public informed of the County’s efforts at minimizing pollutant discharge through its MS4 and to encourage public involvement and participation in the pollution prevention efforts.

4.2.1 MS4 General Permit Compliance Requirements

The County must develop and implement procedures regarding public involvement and participation that allows for the public to provide input on the County programs and reporting stormwater issues. The County must provide information specific to its MS4 program through its website and provide for annual public participation in a minimum of four (4) events selected from a minimum of two (2) of five (5) MS4 General Permit identified categories. Table 7 contains a summary of the MCM #2 Permit Conditions as well as the location of the specific MS4 General Permit language.

Table 7. Summary of MS4 General Permit Conditions for MCM #2

Summary of the MS4 General Permit MCM #2 Permit Conditions	Specific MS4 General Permit Language (Appendix 1 Line Numbers)
<p>The County must develop and implement procedures for the following:</p> <ul style="list-style-type: none"> ▪ 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. 	337-345
<p>By February 1, 2019, the County must develop and maintain a website dedicated to the MS4 Program and stormwater pollution prevention. The webpage must include:</p> <ul style="list-style-type: none"> ▪ The effective MS4 General Permit and coverage letter; ▪ The most current MS4 Program Plan (or location where the MS4 Program Plan can be obtained); ▪ A mechanism for the public to report <ul style="list-style-type: none"> - Potential illicit discharges, improper disposal or spills to the MS4 - Complaints regarding land disturbing activities - Other potential stormwater pollution prevention concerns; and ▪ A method for how the public can provide input on the MS4 Program Plan. 	346-357

Summary of the MS4 General Permit MCM #2 Permit Conditions	Specific MS4 General Permit Language (Appendix 1 Line Numbers)
<p>The County must implement no less than four (4) activities per year from two or more of the following categories to provide an opportunity for public involvement to improve water quality and support local restoration and clean-up projects:</p> <ul style="list-style-type: none"> ▪ Monitoring such as, but not limited to, establishing or supporting a citizen monitoring group; ▪ Restoration such as, but not limited to, stream or watershed clean-up days or adopt-a-water way program; ▪ Educational events such as, but not limited to, sponsoring a booth at community fair, stormwater control demonstration projects, presentation of stormwater materials to schools to meet applicable education Standards of Learning or curriculum requirements, watershed walks, or participation on environmental advisory committees; ▪ Disposal or collection events such as, but not limited to, household hazardous waste collection or vehicle fluids collection; and ▪ Pollution prevention programs such as, but not limited to, public adopt-a-storm drain or street programs, storm drain marking, promoting residential stormwater BMPs usage, or implementation of pet waste stations in public areas. 	358-361
<p>MS4 Program Plan must include:</p> <ul style="list-style-type: none"> ▪ The webpage address where mechanisms for the public to report (i) potential illicit discharges, improper disposal, or spills to the MS4, (ii) complaints regarding land disturbing activities, or (iii) other potential stormwater pollution concerns; ▪ The webpage address that contains the methods for how the public can provide input on the permittee's MS4 program; and ▪ A description of the public involvement activities to be implemented by the permittee, the anticipated time period the activities will occur, and a metric for each activity to determine if the activity is beneficial to water quality. 	364-373

4.2.2 Selected County BMPs and Strategies

The MS4 Program Plan includes the following BMPs/compliance strategies to meet the MS4 General Permit requirements for MCM #2.

BMP #2.1 – Stormwater and MS4 Public Reporting and Communication

DPW-EP maintains an Environmental website, <https://staffordcountyva.gov/998/Environmental>, that is comprised of individual webpages regarding the Chesapeake Bay Act, Erosion and Sediment Control, Stormwater Management, Wetlands and Other Environmental Agencies. The Stormwater Management webpage also includes links to webpages dedicated to the MS4 Stormwater Permit Program, the Chesapeake Bay TMDL Action Plan and Plan Review and Inspections.

The County’s MS4 Stormwater Permit Program webpage includes a link to the current MS4 General Permit and the County’s Notice of Coverage under the permit from DEQ. The MS4 Stormwater Permit

Program webpage also includes links to the County's current MS4 Program Plan as well as the its MS4 Annual Report. In addition, the MS4 Stormwater Permit Program webpage directs the public to report potential illicit discharges, improper disposal or spills to the MS4; complaints regarding land disturbing activities; and other potential stormwater pollution prevention concerns to DPW-EP via the following methods:

- Calling the (504) 658-8830; and
- Providing a link to the Environmental Programs' e-mail addresses

The public can also utilize the County's Citizen Service Request Tracker, or the Stafford 311 system as directed on the Environmental website to report their concerns.

The County will utilize the Environmental website to provide public access to documents, such as the MS4 Program Plan and Chesapeake Bay TMDL Action Plan, for which public comment is requested.

Roles and Responsibilities

- The DPW-EP is responsible for coordinating public communication regarding stormwater management issues among County departments as well as web-page content.

Necessary Reference Materials and Documents

- The County's Environmental websites (<https://staffordcountyva.gov/998/Environmental>)

BMP #2.2 – Public Involvement and Participation Opportunities

The County has developed and implemented numerous involvement and participation opportunities for the public that are available for the public.

Opportunities for Public Involvement and Participation

- River Clean-Up Events

The Friends of the Rappahannock (FOR) promote and lead numerous river cleanup projects in the Rappahannock River portion of Stafford County. Through a MOU between the County and FOR, FOR manages the river clean-up program and reports a narrative description to the County of each project including various metrics as described in the MOU. The County bases its selection of Storm Drain Marking as a valuable BMP on EPA's inclusion of the BMP in its National Menu of BMPs for Stormwater, which listed practices that can successfully achieve the requirements of the MCMs.

- Volunteer Storm Drain Marking Program

DPW-EP continuously promotes its voluntary Storm Drain Marking Program through its environmental website (<https://staffordcountyva.gov/998/Environmental>). DPW-EP works with interested community organizations to install "Only Rain Down the Drain" storm drain markers in subdivisions throughout the County. The County provides interested citizens storm drain markers and application instructions while coordinating with VDOT to obtain the necessary permits to mark residential street stormwater drainage infrastructure. The Volunteer Storm Drain Marking Program meets the Pollution Prevention category of the MS4 General Permit. Each storm drain marking event counts towards meeting the MS4 General Permit-required four public involvement opportunities.

The County bases its selection of Storm Drain Marking as a valuable BMP on EPA's inclusion of the BMP in its National Menu of BMPs for Stormwater, which listed practices that can successfully achieve the requirements of the MCMs.

- **Regional Solid Waste Management Board Household Hazardous Waste Collection Program**

The R-Board is a joint venture between the Stafford County and the City of Fredericksburg government that is responsible for the operation and maintenance of the Regional Landfill and recycling drop-off facilities in Stafford and Fredericksburg. Since 1999, the R-Board has voluntarily held spring and fall household hazardous waste (HHW) collection events at which the County residents may participate. As of November 1, 2019, the Spring HHW collection event is held in Fredericksburg while the Fall HHW collection event is held in Stafford. R-Board promotes the events using their website and social media and provides a summary of the HHW collection events including the number of participants and type of HHWs collected in their Annual Financial & Operational Report. The HHW Program meets the Disposal or Collection Event category of the MS4 General Permit and is one of four activities required. Each HHW event counts towards meeting the MS4 General Permit-required four (4) public involvement opportunities.

The County bases its selection of HHW Collection as being beneficial to improving water quality based on EPA's recognition in its 1993 publication, Household Hazardous Waste Steps to Safe Management (EPA 530-F-92-031) that the improper disposal of HHW through disposal can cause environmental damage and that recycling is an economical and environmentally sound way to handle some types of household hazardous wastes.

- **Stafford County Cooperative Extension Office Smart Green Lawns Program**

The Stafford County VCE offers the Smart Green Lawns Program to County residents. The Smart Green Lawns Program is designed to ensure healthy green lawns while using environmentally safe practices to protect local waters. County residents who participate in the program receive a site visit from a trained Master Gardener volunteer, soil tests, a Smart Green Lawns handbook and a customized lawn and fertilizer plan specific for the participants lawn. The Smart Green Lawns program is available to County residents between March 1 and October 31 each year. County residents who wish to participate enroll into the program by completion and submission of the Smart Green Lawns Program enrollment form to the Stafford VCE along the applicable fees. The Smart Green Lawns Program meets the Disposal or Collection Event category of the MS4 General Permit and is one of four activities required. Each Smart Green Lawn counts towards meeting the MS4 General Permit-required four public involvement opportunities.

The County bases its selection of the Smart Green Lawns Program as being beneficial to improving water quality on Virginia's desire to expand homeowner lawn management programs in the Phase III Chesapeake Bay TMDL Implementation Plan as released on April 11, 2019.

- **Duff McDuff Green Memorial Park Dog Park Pet Waste Stations**

The County operates three (3) separate dog park areas at the Duff McDuff Green Memorial Park. These include an areas for both small and large dogs and an open area of approximately 4-acres for all dogs to run. In order to encourage pet waste clean-up, the County provides pet waste stations at all three facilities. The pet waste stations at the three Duff McDuff Green Memorial Park dog park areas meet the Pollution Prevention category of the MS4 General Permit and is one of four activities required. Each pet waste station counts towards meeting the MS4 General Permit-required four (4) public involvement opportunities.

The County bases its selection of Pet Waste Stations as being beneficial to improving water quality on its inclusion in the DEQ Guidance Manual for TMDL Implementation Plans (June 2017), which states "pet waste management programs are successful pollutant management

strategies targeted at the residential community for reducing bacteria associated with pet wastes.”

- **Additional Public Involvement and Participation Opportunities**

While the MS4 Program Plan includes the descriptions for those public involvement and participation BMPs that the County anticipates utilizing over multiple reporting periods, the County also recognizes that additional public involvement and participation opportunities related to stormwater pollution prevention occur throughout the County, such as stream and park clean-up days.

Roles and Responsibilities

- **River Clean-Up Program**
 - DPW-EP is responsible for coordinating the River Clean-Up Program with FOR and maintaining an up-to-date and current MOU.
 - FOR is responsible for the commitments outlined in the FOR Stafford County MS4 Support Memorandum of Understanding
- **Storm Drain Marking**
 - DPW-EP is responsible for promoting the storm drain marking program, providing the necessary storm drain markers and instructions and coordinating with the local VDOT District office to obtain the necessary VDOT land use permits for storm sewer stenciling. DPW-EP is responsible for coordinating implementation efforts led by Partner Organizations as outlined in MOUs between the County and the Partner Organizations.
 - FOR is responsible for meeting the commitments outlined in the FOR Stafford County MS4 Support Memorandum of Understanding
- **Household Hazardous Waste Collection**
 - DPW-EP is responsible for coordinating with the R-Board to obtain the information required for the MS4 Annual Report.
 - The R-Board is responsible for the continued implementation of HHW collection events
 - DPW-EP is responsible for coordinating with the R-Board to obtain the information required for the MS4 Annual Report.
- **Smart Green Lawns Program**
 - DPW-EP is responsible to coordinate with VCE to identify the number of County residents who participate in the program.
 - VCE is responsible to continue to provide the Smart Green Lawns Program to the residents of the County.
 - Both VCE and DPW-EP have a role in the continued publicization of the Smart Green Lawns Program.
- **Duff McDuff Memorial Park Pet Waste Stations**
 - PRCF is responsible for maintaining the pet waste stations at each of the three dog park areas at Duff McDuff Green Memorial Park.

- Additional Public Involvement and Participation Opportunities
 - DPW-EP is responsible for the identification, selection and defining the County’s involvement regarding additional public involvement and participation opportunities in relationship to MCM #2. DPW-EP is responsible for providing the necessary information regarding the public involvement and participation opportunity in the MS4 Annual Report including categorizing the activity in one of the four MS4 General Permit-identified categories, providing a metric to evaluate whether the activity is beneficial to improving water quality and identifying other MS4 operators who also participated in implementation of the event.

Necessary Reference Materials and Documents

- River Clean-Up Program
 - FOR Stafford County MS4 Support Memorandum of Understanding
- Storm Drain Marking
 - Information regarding VDOT Land Use Permit requirements is available at http://www.virginiadot.org/business/locdes/ms4_stormwater_management.asp.
 - FOR Stafford County MS4 Support Memorandum of Understanding
- Smart Green Lawns Program
 - Information regarding the Smart Green Lawns program, including the enrollment form, is available at <https://stafford.ext.vt.edu/index.html>

4.2.3 Specifically Identified MS4 General Permit Compliance Dates and Schedules

Table 8. contains the dates and schedules specific to complying with the permit conditions associated with MCM #4 that are in the MS4 General Permit.

Table 8: MS4 General Permit Compliance Dates Pertaining to MCM #2

Due Date	Requirement
2/1/2019	The County must develop and maintain a website dedicated to the MS4 Program and stormwater pollution prevention. The webpage must include: <ul style="list-style-type: none"> ▪ The effective MS4 General Permit and coverage letter ▪ The most current MS4 Program Plan (or location where the MS4 Program Plan can be obtained) ▪ A mechanism for the public to report <ul style="list-style-type: none"> - Potential illicit discharges, improper disposal or spills to the MS4 - Complaints regarding land disturbing activities - Other potential stormwater pollution prevention concerns ▪ A mechanism for how the public can provide input on the MS4 Program Plan
11/30/2019	The County must post the MS4 Annual Report for PY01 on the MS4 Program website prior to this date.
11/30/2020	The County must post the MS4 Annual Report for PY02 on the MS4 Program website prior to this date.
11/30/2021	The County must post the MS4 Annual Report for PY03 on the MS4 Program website prior to this date.
11/30/2022	The County must post the MS4 Annual Report for PY04 on the MS4 Program website prior to this date.
11/30/2023	The County must post the MS4 Annual Report for PY05 on the MS4 Program website prior to this date.

4.2.4 Annual Reporting Requirements

The MS4 General Permit requires that the items specific to MCM #2 identified in Table 9 be reported as part of the MS4 Annual Report.

Table 9. MS4 Annual Report Reporting Item Requirements Specific to MCM #2

MCM4 Required MS4 Annual Report Reporting Item
A summary of any public input of the MS4 Program received (including stormwater complaints) and how the County responded.
A webpage address to the County’s MS4 Program and stormwater website.
A description of the public involvement activities implemented by the County.
A report of the metric as defined by each activity and an evaluation as to whether the activity is beneficial to improving water quality.
The name of other MS4 permittees with whom the County collaborated in the public involvement opportunities.

4.3 Minimum Control Measure 3 – Illicit Discharge Detection and Elimination (MCM #3)

MCM #3 requires the County to maintain a map of the storm sewer system owned and operated by the County that is located within the census urbanized area identified by the 2010 decennial census, implement and enforce illicit discharge identification and elimination prohibitions and procedures including dry weather screening.

4.3.1 MS4 General Permit Compliance Requirements

Table 10 includes a summary of the MCM #3 MS4 General Permit Conditions along with the location of the specific language in the MS4 General Permit

Table 10. Summary of MS4 General Permit Conditions for MCM #3

<p align="center">Summary of the MS4 General Permit MCM #3 Permit Conditions</p>	<p align="center">Specific MS4 General Permit Language (Appendix 1 Line Numbers)</p>
<p>The County must maintain an accurate MS4 map and outfall information table that includes</p> <ul style="list-style-type: none"> ▪ A map of the MS4 owned or operated by the County within the 2010 Census UA. <ul style="list-style-type: none"> - MS4 outfalls discharging into surface water, except <ul style="list-style-type: none"> • If the outfall is located outside of the County’s legal responsibility, the County may map the known point of discharge closest to the actual outfall • If the outfall discharges to a receiving water that is channelized underground, the County may elect to map the point downstream at which the receiving water emerges above ground as an outfall location. The County must note if the outfall location receives discharges from more than one outfall. - A unique identifier for each mapped item - The name and receiving waters to which each outfall or point of discharge discharges - The MS4 service area - The stormwater management facilities owned by the County ▪ The associated outfall information table for the MS4 map must include the following information: <ul style="list-style-type: none"> - A unique identifier for each mapped item - The latitude and longitude of each outfall or point of discharge - The estimated regulated acreage draining to each outfall or point of discharge - The name of the receiving water - The 6th Order Hydrologic Unit Code of the receiving water - An indication whether the receiving water is listed as impaired on the Virginia 2016 305(b)/303(d) Water Quality Assessment Integrated Report - The predominant land use for each outfall discharging to an impaired water - The name of any EPA approved TMDLs for which the County is assigned a wasteload allocation 	<p align="center">383-411</p>
<p>No later than July 1, 2019, the County must submit to DEQ a GIS-compatible shapefile of the permittee's MS4 map as described above. If the permittee does not have an MS4 map in a GIS format, the permittee shall provide the map as a PDF document.</p>	<p align="center">412-417</p>

<p align="center">Summary of the MS4 General Permit MCM #3 Permit Conditions</p>	<p align="center">Specific MS4 General Permit Language (Appendix 1 Line Numbers)</p>
<p>The County must provide written notification to any downstream adjacent of any known physical interconnection <u>established or discovered</u> after the effective date of the permit.</p>	<p align="center">418-419</p>
<p>The County must prohibit through legal mechanism unauthorized non-stormwater discharges into the County’s MS4. The County must address authorized stormwater discharges or flows if the County identifies them as a significant contributor of pollutants contributing to the MS4.</p>	<p align="center">420-424</p>
<p>The County must maintain, implement and enforce IDDE written procedures to designed to detect, identify and address unauthorized non-stormwater discharges, including illegal dumping, to the small MS4 to effectively eliminate the unauthorized discharge. The written procedures must include:</p> <ul style="list-style-type: none"> ▪ A description of the legal authorities, policies, SOPs and other legal mechanisms available to the County for elimination of illicit discharges ▪ Dry weather screening protocols that include: <ul style="list-style-type: none"> - A prioritized schedule of field screening activities and rationale for such prioritization - A schedule to annually 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. - A mechanism to track the following: <ul style="list-style-type: none"> • The unique outfall identifier for each outfall screened • The time since the last precipitation event • The estimated quantity of the last precipitation event • Site description (e.g., conveyance type and dominant watershed land use) • Presence of an observed discharge • The estimated discharge rate and visual characteristics of the observed discharge - A timeframe upon which to conduct an investigation to identify and locate the source of any unauthorized non-stormwater discharge - Methodologies to determine the source of all illicit discharges - Methodologies for conducting illicit discharge follow-up investigations for illicit discharges that are continuous or expected to occur more frequently than a one-time discharge to verify the discharge has been eliminated - A mechanism to track all illicit discharge investigations to document the following <ul style="list-style-type: none"> • The dates that the illicit discharge was initially observed, reported or both 	<p align="center">425-465</p>

Summary of the MS4 General Permit MCM #3 Permit Conditions	Specific MS4 General Permit Language (Appendix 1 Line Numbers)
<ul style="list-style-type: none"> • The results of the investigation including the source if identified • Any follow-up to the investigation • Resolution of the investigation • The date the investigation was closed 	
<p>The MS4 Program Plan must include:</p> <ul style="list-style-type: none"> ▪ The MS4 map and outfall information table, directly or by reference ▪ Copies of written notifications of new physical interconnections given by the County to other MS4s ▪ The IDDE procedures 	466-472

4.3.2 Selected County BMPs and Strategies

The County has identified the following individual BMPs and strategies to address the MS4 General Permit MCM #3 permit conditions.

BMP #3.1 – Stafford County MS4 Outfall Data Recordkeeping and Mapping

The County maintains numerous geocoded layers in its GIS that contains information that is potentially necessary in implementing its MS4 program such as land use and ownership, streets, elevational contours, utility location, MS4 outfalls, FEMA flood data and watershed and stream data. SWM facilities and BMPs as well as individual MS4 outfalls are provided individual asset IDs and their locations identified via latitude/longitude. Records regarding individual SWM facilities, BMPs or MS4 outfalls are obtained by consolidating available data from County GIS layers, Infor Inspection and Facility Database System, ONBASE Case File Records Repository and current DPW-EP spreadsheets. Records searches can be conducted via numerous methods including asset ID, parcel, and case number and synced with existing GIS layers to provide necessary maps and asset outfall information tables.

Roles and Responsibilities

- DPW-EP is responsible for maintaining an up-to-date, accurate and complete data regarding SWM facilities, BMPs and MS4 outfalls and ensuring that the specific asset information for individual stormwater assets is being maintained. DPW-EP is also responsible for coordinating with IT to ensure that the available GIS layers contain the information necessary to develop and submit the required MS4 Outfall Map and Outfall information tables.
- DPW-EP is responsible for providing an up-to-date MS4 Map and outfall information table to DEQ within 14-days of request.
- IT is responsible for assisting DPW-EP in maintaining an up-to-date, accurate and complete georeferenced information.

Necessary Reference Materials and Documents

- **None Required**

BMP #3.2 – Physically Interconnected MS4 Reporting

In addition to the County-operated MS4, other government agencies operate regulated MS4 within the Stafford County jurisdictional boundary. These include:

- Stafford County School Board (MS4 General Permit Registration Number VAR040071)
 - <https://www.staffordschools.net/Page/20575>
- The US Marine Corps Base Quantico (MS4 General Permit Registration Number VAR040069)
 - <https://www.quantico.marines.mil/Offices-Staff/G-F-Installation-and-Environment/Natural-Resources-Environmental-Affairs/NREA-Documents/>
- The University of Mary Washington (MS4 General Permit Registration Number VAR040094)
 - <https://adminfinance.umw.edu/facilities/storm-water-mangement/>
- The Virginia Department of Transportation (VPDES Permit #VA0092975)
 - http://www.virginiadot.org/business/locdes/ms4_stormwater_management.asp

The County will notify the appropriate MS4 operator, in writing (e-mail is acceptable) of newly established or newly discovered MS4 outfalls based on the following:

- VDOT will be notified of any newly established or newly discovered discharges from County-owned or operated MS4s that discharge into the VDOT right-of-way or onto a VDOT-owned parcel, as identified by the most recent GIS parcel information.
- All other MS4 operators will be notified of any newly established or newly discovered discharges from County-owned or operated MS4s that onto a MS4 operator-owned parcel, as identified by the most recent GIS parcel information.
- A copy of the physical-interconnection notification will be placed in the Reference Library.
- MS4 outfall information will be entered into the County's MS4 database identified under BMP #3.1.

Roles and Responsibilities

- The DPW-EP will notify the appropriate MS4 operators of newly established or newly discovered physically interconnected MS4 outfalls based on the aforementioned criteria.

Necessary Reference Materials and Documents

- A copy of MS4 operator notifications of physically-interconnected MS4 Outfalls

BMP #3.3 – Illicit Discharge Detection and Elimination (IDDE)

The County's legal authority to prohibit illicit discharges into the its MS4 is found in Chapter 21.5 – Stormwater Management, Article II. Stormwater Pollution and Illicit Discharge of the Stafford County Code of Ordinances. Under the authorities provided by this legal authority, the County has developed and implemented the Illicit Discharge Detection and Elimination (IDDE) Standard Operating Procedures Manual (IDDE Manual). The IDDE Manual provides procedures for prioritizing outfalls, conducting dry weather screening, addressing illicit discharge complaints including investigation and recordkeeping, determining the source of suspect discharges, methods including enforcement mechanisms to eliminate illicit discharges and coordinating with other agencies.

Roles and Responsibilities

- DPW-EP is responsible for maintaining an accurate and complete map and outfall information table of MS4 outfalls. DPW-EP is also responsible for coordinating IDDE activities as outlined in the IDDE SOPs including outfall prioritization, dry weather screening, addressing complaints, determining suspect discharge sources, eliminating illicit discharges and reporting illicit discharges.

- The County Attorney is responsible for assisting DPW-EP in ensuring the elimination of illicit discharges under Section 21.5 of the County Code of Ordinances.
- DPU is responsible for follow-up and elimination of illicit discharges originating from DPU infrastructure.
- DPH-ESS is responsible for follow-up and elimination of illicit discharges originating from failed septic systems and straight pipes.
- F&R is responsible for providing emergency response to spills and other hazardous material releases.

Necessary Reference Materials and Documents

The following reference materials and documents are required for the implementation of the MCM #3 BMPs and are available from the Reference Library:

- Illicit Discharge Detection and Elimination (IDDE) Standard Operating Procedures Manual

4.3.3 Specifically Identified MS4 General Permit Compliance Dates and Schedules

Table 11. contains the dates and schedules specific to complying with the permit conditions associated with MCM #3 are in the MS4 General Permit.

Table 11: MS4 General Permit Compliance Dates Pertaining to MCM#3

Due Date	Requirement
7/1/2019 ⁵	The County must submit to DEQ a GIS-compatible shapefile of the County’s MS4 map.
10/1/2019	The County must update the MS4 map and outfall information table to include any new outfalls constructed and/or TMDLs approved during PY01.
10/1/2020	The County must update the MS4 map and outfall information table to include any new outfalls constructed and/or TMDLs approved during PY02.
10/1/2021	The County must update the MS4 map and outfall information table to include any new outfalls constructed and/or TMDLs approved during PY03.
10/1/2022	The County must update the MS4 map and outfall information table to include any new outfalls constructed and/or TMDLs approved during PY04.
10/1/2023	The County must update the MS4 map and outfall information table to include any new outfalls constructed and/or TMDLs approved during PY05.

4.3.4 Annual Reporting Requirements

The MS4 General Permit requires that the items specific to MCM #3 identified in Table 12 be reported as part of the MS4 Annual Report.

⁵ Per MS4 General Permit Part I E 3 d, “The map shall be made available to [DEQ] within 14 days upon request.”

Table 12. MS4 Annual Report Reporting Item Requirements Specific to MCM#3

MCM#3 Required MS4 Annual Report Reporting Item
A confirmation statement that the MS4 map and outfall information table have been updated to reflect any changes to the MS4 occurring on or before June 30 of the reporting year.
The total number of outfalls screened during the reporting period as part of the dry weather screening program
<p>A list of illicit discharges to the MS4, including that spills reach the MS4, with the following information:</p> <ul style="list-style-type: none"> ▪ The source of the illicit discharge ▪ The dates that the [illicit] discharge was observed, reported or both. ▪ Whether the [illicit] discharge was discovered by the County during dry weather screening, reported by the public or other method ▪ How the investigation was resolved ▪ A description of any follow-up activities ▪ The date the investigation was closed

4.4 Minimum Control Measure 4 – Construction Site Stormwater Runoff Control (MCM #4)

MCM #4 contains the MS4 General Permit conditions to address discharges to the MS4 from regulated construction site stormwater runoff.

4.4.1 MS4 General Permit Compliance Requirements

The MS4 General Permit conditions associated with construction site stormwater runoff are consistent with those contained in the Virginia Erosion and Sediment Control Law (§62.1-44:15:51 et seq. of the Code of Virginia) and the Virginia Erosion and Sediment Control Regulations (9VAC25-840) in which the County is required to implement a local VESCP. Under the MS4 General Permit, the County is also required to ensure implementation of appropriate controls to prevent nonstormwater discharges to the MS4 from construction activities regulated under the County’s VSMP.

The County’s VESCP is required to conduct plan reviews, site inspections and enforcement for non-compliance. As a defined Tidewater locality under the Chesapeake Bay Preservation Act (CBPA), the County is required to regulate land disturbing activities that are equal to or greater than 2,500 square feet in areas of the jurisdiction designated by the County under Chapter 27B of the County Code of Ordinances. The County VESCP must be administered by a DEQ-certified Program Administrator with plan reviews and compliance inspections being conducted by DEQ-certified individuals.

In addition to MS4 General Permit conditions pertaining to MS4 Program Plan content and Annual Reporting, the MS4 General Permit contains conditions specific to MCM #4 for which the County must ensure compliance. These specific conditions are summarized in Table 13.

Table 13. Summary of MS4 General Permit Conditions for MCM #4

Summary of the MS4 General Permit MCM #4 Permit Conditions	Specific MS4 General Permit Language (Appendix 1 Line Numbers)
The County is required to 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 runoff through implementation of its DEQ – approved local VESCP consistent with the Virginia Erosion and Sediment Control Law and Virginia Erosion and Sediment Control Regulations.	486-507
The County is required to 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.	521-524
<p>The County’s MS4 Program Plan must include</p> <ul style="list-style-type: none"> ▪ The local ordinance citations for the VESCP ▪ A description of the legal authorities utilized to control construction site stormwater runoff ▪ Written inspection procedures to ensure the ESC controls are properly implemented and all associated documents utilized during inspection including the inspection schedule ▪ Written procedures for requiring compliance through corrective or enforcement action ▪ The roles and responsibilities of each of the County’s departments, divisions, or subdivisions in implementing the construction site stormwater control. 	525-541

4.4.2 Selected County BMPs and Strategies

The County will utilize the combined programs described in BMP 4.1 and BMP 4.1 to address the MS4 General Permit MCM #4 permit conditions.

BMP #4.1 – Combined Stafford County Local Virginia Erosion and Sediment Control Program and Stafford County Local Stormwater Management Program

As a State Water Control Board-approved local authority for both VESCP and VSMP, Stafford County relies on implementation of these programs to meet the MS4 General Permit conditions associated with MCM #4. Both the local VESCP and the VSMP are administered by the DPW-EP. The legal authority for administration of these programs is contained in the County Code of Ordinances Chapter 11 – Erosion and Sediment Control and Chapter 21.5 Stormwater Management. As a Tidewater locality, the County regulates land disturbance activities on projects equal to or larger than 2,500 square feet while requiring development and implementation of pollution prevention plans on construction activities regulated under the Virginia Stormwater Management Act and Regulation.

The responsible parties of proposed land disturbing activities are required to submit site plans for review and approval by DEQ-certified plan reviewers. Site plan applications and checklists for grading

plans and commercial site plans are maintained on the Department of Planning and Zoning website (<https://staffordcountyva.gov/488/Application-Forms>). Pollution Prevention Plan requirements, which are part of the VSMP required Stormwater Pollution Prevention Plan, are evaluated using Chapter 7 of the Stormwater Management (SWM) Design Manual.

Land disturbing cannot begin at regulated activities until a pre-construction meeting is held. As the County doesn't employ an alternative inspection schedule, County ESC inspectors conduct routine land disturbing activity inspections in accordance with Virginia Administrative Code 9VAC25-840-60 B.1., which requires inspections during "inspection during or immediately following initial installation of erosion and sediment controls, at least once in every two-week period, within 48 hours following any runoff producing storm event, and at the completion of the project prior to the release of any performance bonds." Inspection results are provided to the responsible party and recorded into the INFOR Inspection and Facility Database System based on the type of inspection including:

- Type 100 – Erosion and Sediment Control Inspection
- Type 111 – SWPPP Review
- Type 121 – Pollution Prevention Review
- Type 198 – O.P./Yard Inspection (building occupancy)
- Type 199 – Final Erosion Inspection

The County's progressive enforcement for addressing non-compliance is outlined in its Stafford County VSMP Compliance and Enforcement Policy and Procedures with the County utilizing a standardized Notice to Comply template, when appropriate. County records are maintained on the County's Asset Management System in accordance with the Stafford County Stormwater Recordkeeping and Reporting Policy Procedures.

Roles and Responsibilities

- DPW-EP is responsible for the implementation of the County's VESCSP and VSMP.
- The County Attorney's Office is responsible for assisting DPW-EP in the enforcement of Chapter 11 and Chapter 21.5 of the County Code of Ordinances.

Necessary Reference Materials and Documents

- Stormwater Management Design Manual
- Stafford County VSMP Compliance and Enforcement Policy and Procedures
- Stafford County Stormwater Recordkeeping and Reporting Policy Procedures

4.4.3 Specifically Identified MS4 General Permit Compliance Dates and Schedules

MCM#4 does not include any specific compliance dates or schedules outside of what is identified as part of the Annual Reporting Requirements

4.4.4 Annual Reporting Requirements

Note: Under the MS4 General Permit, tracking and reporting requirements apply to only projects that are served by the County's MS4.

The MS4 General Permit requires that the items specific to MCM4 identified in Table 14 be reported as part of the MS4 Annual Report.

Table 14. MS4 Annual Report Reporting Item Requirements Specific to MCM #4

MCM4 Required MS4 Annual Report Reporting Item
The total number of ESC and VSMP inspections conducted
The total number and type of enforcement action implemented for both the ESC and for pollution prevention compliance issues under the VSMP program.
A review and evaluation of MCM #4 program effectiveness and whether changes are necessary

4.5 Minimum Control Measure 5 – Post-Construction Stormwater Management for New Development and Development on Prior Developed Lands (MCM#5)

MCM #5 contains the MS4 General Permit conditions to address discharges to the MS4 from post-development stormwater runoff.

4.5.1 MS4 General Permit Compliance Requirements

The MS4 General Permit conditions associated with post-development stormwater management for new development and development on prior developed lands are consistent with those contained in the Virginia Stormwater Management Act (§62.1-44:15:28 et seq. of the Code of Virginia) and the Virginia Stormwater Management Program Regulations (9VAC25-870). Under the MS4 General Permit, the County is also required to ensure that both public and private permanent stormwater management facilities are maintained and continue to function as designed.

The County’s VSMP is required to conduct plan reviews, site inspections and enforcement for non-compliance. As a defined Tidewater locality under the CBPA, the County is required to regulate land disturbing activities that are equal to or greater than 2,500 square feet in areas of the jurisdiction designated by the County as regulated as part of the CBPA area. The County VSMP must be administered by a DEQ-certified Program Administrator with plan reviews and compliance inspections being conducted by DEQ-certified individuals.

In addition to MS4 General Permit conditions pertaining to MS4 Program Plan content and Annual Reporting, the MS4 General Permit contains conditions specific to MCM #5 for which the County must ensure compliance. These specific conditions are summarized in Table 15.

Table 15. Summary of MS4 General Permit Conditions for MCM #5

<p>Summary of the MS4 General Permit MCM #5 Permit Conditions</p>	<p>Specific MS4 General Permit Language (Appendix 1 Line Numbers)</p>
<p>The County must implement its DEQ-approved VSMP consistent with the Virginia Stormwater Management Act and the VSMP regulations.</p>	<p>553-579</p>
<p>The County must implement an inspection and maintenance program for its stormwater management facilities based on:</p> <ul style="list-style-type: none"> ▪ Written inspection and maintenance procedures designed to ensure adequate long-term operation and maintenance of the stormwater management facilities ▪ SWM facility inspections occurring no less than once a year unless an alternative schedule is implemented based on facility type and expected facility needs provided that the alternative schedule and rationale is included in the MS4 Program Plan and the inspection frequency is no less than once per five years ▪ Required maintenance discovered as part of the inspection process is conducted in accordance with the required written procedures 	<p>580-591</p>
<p>The County must implement an inspection and enforcement program, to the maximum extent allowable under legal authority, for all privately-owned SWM facilities that discharge into the MS4 based on</p> <ul style="list-style-type: none"> ▪ An inspection frequency of no less than once per five years ▪ Adequate long-term operation and maintenance by the SWM facility owner requiring the owner to develop and record a maintenance agreement, that includes an inspection schedule ▪ Utilization of the County’s legal authority for enforcement if maintenance is neglected. 	<p>592-603</p>

<p align="center">Summary of the MS4 General Permit MCM #5 Permit Conditions</p>	<p align="center">Specific MS4 General Permit Language (Appendix 1 Line Numbers)</p>
<p>The County must maintain an electronic database of all known SWM facilities that discharge into the MS4. The database must include the following for each SWM facility or BMP:</p> <ul style="list-style-type: none"> ▪ Type ▪ Location as latitude and longitude and 6th Order Hydrologic Unit Code ▪ Acres treated including <ul style="list-style-type: none"> - Total - Pervious - Impervious ▪ The date the SWM facility or BMP was brought on-line (MM/YYYY) ▪ Ownership distinguished between County-owned or privately-owned ▪ Whether the SWM facility is part of a County TMDL Action Plan required by the MS4 General Permit Part II A, B or both ▪ If the SWM facility or BMP is privately-owned, if a Maintenance Agreement exists ▪ The date of the County’s most recent inspection of the SWM facility or BMP. 	<p align="center">604-621</p>
<p>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 the TMDL Special Conditions or discovered if it is an existing stormwater management facility.</p>	<p align="center">622-624</p>
<p>The County must 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.</p>	<p align="center">625-628</p>
<p>No later than October 1 of each year, the County must 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.</p>	<p align="center">629-634</p>

Summary of the MS4 General Permit MCM #5 Permit Conditions	Specific MS4 General Permit Language (Appendix 1 Line Numbers)
<p>The County’s MS4 Program Plan must include:</p> <ul style="list-style-type: none"> ▪ A copy of the DEQ VSMP approval letter ▪ Written inspection procedures and all associated documents utilized in the inspection of privately-owned SWM facilities ▪ Written procedures for compliance and enforcement of inspection and maintenance requirements for privately owned BMPs ▪ Written inspection procedures and all associated documents utilized during inspection of SWM facilities owned and operated by the County ▪ The roles and responsibilities of each of the County’s departments, divisions, or subdivisions in implementing the post-construction stormwater runoff control program ▪ The SWM facility database incorporated by reference and the location or webpage address where it can be reviewed. 	<p style="text-align: center;">635-655</p>

4.5.2 Selected County BMPs and Strategies

The County will utilize the following BMPs to address the MS4 General Permit MCM #5 permit conditions.

BMP #5.1 – Stafford County Virginia Stormwater Management Program

As a State Water Control Board-approved local authority for VSMP, Stafford County relies on implementation of these programs to meet the MS4 General Permit conditions associated with MCM #5 regarding plan review and approval, inspection during construction, development and implementation of a site-specific SWPPP and ensuring controls are implemented to control both the quality and quantity of post-development stormwater runoff. The legal authority for administration of the VSMP program is contained in the County Code of Ordinances Chapter 21.5 Stormwater Management. As a Tidewater locality, the County regulates land disturbance activities on projects equal to or larger than 2,500 square feet while requiring development and implementation of pollution prevention plans on construction activities regulated under the Virginia Stormwater Management Act and Regulation.

The responsible parties of proposed land disturbing activities are required to submit site plans for review and approval by DEQ-certified plan reviewers. Site plan applications and checklists for grading plans and commercial site plans are maintained on the Department of Planning and Zoning website (<https://staffordcountyva.gov/488/Application-Forms>). Pollution Prevention Plan requirements, which are part of the VSMP required Stormwater Pollution Prevention Plan, are evaluated using the Stafford County Stormwater Management (SWM) Design Manual. As part of the plan approval process, a Maintenance Agreement for Stormwater Management System must be executed between the private property owner and the Stafford County Board of Supervisors and recorded with the Clerk of Circuit Court. In addition, a long-term maintenance plan must be developed and attached to the maintenance agreement. Current maintenance agreement applications are maintained on the Department of Planning and Zoning website.

During active construction, inspections are held concurrently with the VESCP inspections identified in BMP #4.1 with the results being recorded in the Infor Inspection and Facility Database System as well as being provided to the responsible party.

The County's progressive enforcement for addressing non-compliance is outlined in its Stafford County VSMP Compliance and Enforcement Policy and Procedures with the County utilizing a standardized Notice to Comply template, when appropriate. County records are maintained on the County's Asset Management System in accordance with the Stafford County Stormwater Recordkeeping and Reporting Policy Procedures.

Upon project completion, DPW-EP adds new SWM facilities into an in-house excel spreadsheet in order to maintain up-to-date list of SWM facilities and associated information for post-development SWM facility inspections identified in BMP #5.2 and BMP #5.3. The spreadsheet is designed to be a working document, meaning that it is constantly being updated to include the most current list of, and information pertaining to, SWM facilities.

Roles and Responsibilities

- DPW-EP is responsible for the implementation of the County's VSMP including maintaining accurate, up-to-date SWM facility records.
- The County Attorney's office is responsible for assisting DPW-EP in enforcement of Chapter 21.5 of the Stafford County Code of Ordinances.
- IT is responsible for assisting DPW-EP with database and GIS management needs.

Necessary Reference Materials and Documents

- DEQ VSMP Approval Notification Letter
- Stafford County Stormwater Management Design Manual
- Stafford County VSMP Compliance and Enforcement Policy and Procedures
- Stafford County Stormwater Recordkeeping and Reporting Policy and Procedures
- Inspection records maintained in the Infor Inspection and Facility Database System
- Approved plans and as-builts located on ONBASE Case File Records Repository
- Hard-copy plans and as-builts for historical projects not included on the ONBASE Case File Records Repository

BMP #5.2 – County Owned/Operated Stormwater Management Facility Inspection and Maintenance

The County has developed and implemented the County Owned/Operated SWM Facility Inspections and Maintenance Procedures (I&M Procedures). The I&M Procedures define the inspection schedules for County owned/operated SWM facilities and the procedures to ensure required maintenance is conducted. The I&M Procedures include operation and maintenance checklists and identify the responsible County department for each County SWM facility.

Roles and Responsibilities

- DPW-EP is responsible for conducting SWM facility inspections and follow-ups as described in the County Owned/Operated SWM Facility Inspection and Maintenance Procedures. DPW-EP is responsible for documenting SWM facility inspections and follow-ups in the County's Infor Asset Management System.
- DPU is responsible for conducting maintenance on DPU SWM facilities as described in the County Owned/Operated SWM Facility Inspection and Maintenance Procedures.

- DPW is responsible for conducting maintenance on County-owned/operated Regional SWM facilities as described in the County Owned/Operated SWM Facility Inspection and Maintenance Procedures.
- PRCF is responsible for conducting maintenance on County-owned/operated Regional SWM facilities as described in the County Owned/Operated SWM Facility Inspection and Maintenance Procedures.

Necessary Reference Materials and Documents

- County Owned/Operated Stormwater Management Facility Inspection and Maintenance Procedures

BMP #5.3 – Private Stormwater Management Facility Inspection and Maintenance

DPW-EP inspectors conduct on-site inspections on privately-owned SWM facilities over a two-year time period. The universe of privately-owned SWM facilities has been divided into 24 individual lists that provide monthly inspection schedules for DPW-EP inspectors and ensure that all facilities are inspected over the two-year time period. Construction records are available to the inspector either by hard-copy or, for SWM facilities brought on-line after 2018, digitally through the County’s ONBASE case files records repository.

Inspections are conducted using County-specific inspection checklists based on DEQ operations and maintenance checklists. Inspection records are entered into the County’s INFOR Inspection and Facility Database System as SW800 (Biennial Stormwater Inspections). SWM facility owners are provided a letter of inspection results that details the inspection findings and any required maintenance needs. A copy of the letter is placed in the ONBASE case files record repository. Follow-up inspections, when necessary, are documented in the INFOR Inspection and Facility Database System as SW801 inspections. Additional compliance and enforcement are conducted in accordance to the Stafford County VSMP Compliance and Enforcement Policy and Procedures.

Roles and Responsibilities

- DPW-EP is responsible for maintaining an updated SWM facility database and an up-to-date map and outfall information table including updating the local SWM facility database.
- DPW-EP is responsible for the electronic reporting of the SWM facilities and BMPs using the DEQ Construction Stormwater Database for SWM facilities covered under a General VPDES Permit for Discharges of Stormwater from Construction Activities.
- DPW-EP is responsible for the inspection of privately-owned SWM facilities and for enforcing maintenance requirements so that SWM facilities function as designed.
- The County Attorney’s office is responsible for assisting DPW-EP in enforcement of Chapter 21.5 of the County Code of Ordinances.

Necessary Reference Materials and Documents

- Inspection Procedures for Inspecting Privately Owned SWM Facilities
- Individual records maintained on the INFOR Inspection and Facility Database System and the ONBASE Case File Records Repository
- Stafford County VSMP Compliance and Enforcement Policy and Procedures

4.5.3 Specifically Identified MS4 General Permit Compliance Dates and Schedules

Table 16 contains the dates and schedules specific to complying with the permit conditions associated with MCM #5 that are in the MS4 General Permit.

Table 16: MS4 General Permit Compliance Dates Pertaining to MCM #5

Due Date	Requirement
Variable, Continuous	The SWM facility database must be updated no later than 30-days after a new SWM facility is brought on-line, a new BMP is implemented to meet a TMDL load reduction as part of a County TMDL Action Plan or a previously-unknown existing SWM facility is discovered.
10/1/2019	The County must use the DEQ BMP Warehouse and associated reporting template to electronically report the SWM facilities and BMPs implemented between July 1, 2018 and June 30, 2019 to comply with the CPBA and for which coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities was not required.
10/1/2020	The County must use the DEQ BMP Warehouse and associated reporting template to electronically report the SWM facilities and BMPs implemented between July 1, 2019 and June 30, 2020 to comply with the CPBA and for which coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities was not required.
10/1/2021	The County must use the DEQ BMP Warehouse and associated reporting template to electronically report the SWM facilities and BMPs implemented between July 1, 2020 and June 30, 2021 to comply with the CPBA and for which coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities was not required.
10/1/2022	The County must use the DEQ BMP Warehouse and associated reporting template to electronically report the SWM facilities and BMPs implemented between July 1, 2021 and June 30, 2022 to comply with the CPBA and for which coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities was not required.
10/1/2023	The County must use the DEQ BMP Warehouse and associated reporting template to electronically report the SWM facilities and BMPs implemented between July 1, 2022 and June 30, 2023 to comply with the CPBA and for which coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities was not required.

4.5.4 Annual Reporting Requirements

Note: Under the MS4 General Permit, tracking and reporting requirements apply to only projects that are served by the County’s MS4.

The MS4 General Permit requires that the items specific to MCM #4 identified in Table 17 be reported as part of the MS4 Annual Report.

Table 17. MS4 Annual Report Reporting Item Requirements Specific to MCM #5

MCM4 Required MS4 Annual Report Reporting Item
The number of privately-owned stormwater management facilities inspected.
The number and type of enforcement actions initiated by the County to ensure long-term maintenance of privately-owned stormwater management facilities.
The total number of inspections conducted on stormwater management facilities owned or operated by the County.
A description of the significant maintenance, repair or retrofit activities, not including routine activities, performed on the stormwater management facilities to ensure that it continues to perform as designed.
A confirmation statement that the County submitted stormwater management facility information through the Virginia Construction Stormwater General Permit database for those land disturbing activities required to obtain coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities.
A confirmation statement that the County electronically reported BMPs using the DEQ BMP Warehouse and the date upon which the information was submitted.

4.6 Minimum Control Measure 6 – Pollution Prevention and Good Housekeeping for Facilities Owned and Operated by the Permittee within the MS4 Service Area (MCM #6)

MCM #6 defines the MS4 General Permit’s conditions and requirements for minimizing pollutant discharge associated with County facilities and operations. MCM #6 requires the County to develop and implement pollution prevention/good housekeeping procedures at County activities, develop stormwater pollution prevention plans for certain County high-priority facilities with a high potential for causing pollution, development and implementation of nutrient management plans at County facilities where nutrients are applied on an area greater than one contiguous acre and implement a stormwater training program for County employees and contractors.

4.6.1 MS4 General Permit Compliance Requirements

The MS4 General Permit contains numerous specific conditions. These conditions are summarized in Table 18.

Table 18. Summary of MS4 General Permit Conditions for MCM #6

<p>Summary of the MS4 General Permit MCM #6 Permit Conditions</p>	<p>Specific MS4 General Permit Language (Appendix 1 Line Number)</p>
<p>The County must maintain and implement written procedures for activities such as road, street and parking lot maintenance, equipment maintenance, and the application, storage and disposal of pesticides, herbicides and fertilizers at County facilities designed to:</p> <ul style="list-style-type: none"> ▪ Prevent illicit discharges ▪ Ensure proper disposal of waste materials including landscape wastes ▪ Prevent the discharge of wastewater or County vehicle wash water into the MS4 without separate VPDES permit authorization ▪ Require implementation of best management practices (BMPs) when discharging water pumped from utility construction and maintenance activities ▪ Minimize the pollutants in stormwater runoff from bulk storage ▪ Prevent pollutant discharge into the MS4 from leaking automobiles and equipment ▪ Ensure that the application of materials including fertilizers and pesticides is conducted in accordance with the manufacturer’s recommendations 	<p>674-689</p>
<p>The County must maintain a list of County high-priority facilities and denote if the high-priority facility has a high potential to discharge pollutants.</p>	<p>692-711</p>
<p>The County must maintain and implement a site-specific stormwater pollution prevention plan (SWPPP) at each County facility considered as a high-priority facility with a high potential of discharging pollutants in accordance with the MS4 General Permit.</p>	<p>712-727</p>
<p>No later than June 30 of each year, the County must 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. If the facility is determined to be a high-priority facility with a high potential to discharge pollutants, the permittee shall develop a SWPPP no later than December 31 of that same year.</p>	<p>728-732</p>
<p>The County must 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.</p>	<p>733-736</p>
<p>The County must keep the maintained SWPPPs at each applicable high priority facility with the high potential to discharge pollutants and utilize the SWPPPs as part of the required on-site SWPPP training.</p>	<p>737-739</p>

Summary of the MS4 General Permit MCM #6 Permit Conditions	Specific MS4 General Permit Language (Appendix 1 Line Number)
The County must implement certified nutrient management plans on all County lands where nutrients are applied to a contiguous area greater than one acre.	743-747
The County must follow manufacturer’s recommendations for nutrients applied to achieve final stabilization of a land disturbing project.	
The County must not utilize urea or other forms of nitrogen or phosphorus as a deicing agent for parking lots roadways sidewalks or other paved surfaces.	751-752
The County must employ methods within its legal authority such as contract language, training, SOPs or other measures, to minimize the discharge of pollutants to the MS4 from contractors employed by the County.	753-756
<p>The County must develop and implement a written training program that ensures</p> <ul style="list-style-type: none"> ▪ Field personnel receive training regarding the recognition and reporting of illicit discharges no less than every 24 months ▪ Employees involved in the maintenance of roads, streets and parking lots receive good housekeeping and pollution prevention training no less than every 24 months ▪ Employees working in and around maintenance, public works and recreational facilities receive good housekeeping and pollution prevention training regarding those facilities no less than every 24 months ▪ Employees and County-hired contractors who apply pesticides and herbicides are trained or certified in accordance with the Virginia Pesticide Control Act ▪ Employees and County-hired contractors serving as plan reviewers, inspectors, program administrators and construction site operators obtain the appropriate DEQ Erosion and Sediment Control certifications ▪ Employees and County-hired contractors implementing the VSMP obtain the appropriate DEQ Stormwater Management certifications ▪ Employees whose duties include emergency response have been trained in spill response <p>The County must use the written procedures regarding activity pollution prevention and good housekeeping in the MS4 General Permit required employee training program.</p> <p>The County must document the following each good housekeeping and pollution prevention event:</p> <ul style="list-style-type: none"> ▪ The date of the training event ▪ The number of employees attending the training event ▪ The objective of the training event 	757-782

Summary of the MS4 General Permit MCM #6 Permit Conditions	Specific MS4 General Permit Language (Appendix 1 Line Number)
<p>The MS4 Program Plan must include:</p> <ul style="list-style-type: none"> ▪ The written good housekeeping/pollution prevention procedures ▪ A list of all County-owned high-priority facilities and whether each facility has a high potential to discharge pollutants ▪ A list of lands for which NMPs are required that includes: <ul style="list-style-type: none"> - The total acreage on which nutrients are applied - The date of the most recent NMP for each property - The location of each NMP ▪ A summary of the mechanisms the permittee uses to ensure contractors working on behalf of the County implements necessary good housekeeping, pollution prevention procedures and stormwater pollution plans ▪ The written training plan 	786-798

4.6.2 Selected County BMPs and Strategies

The County will implement the following BMPs to address the MS4 General Permit MCM#6 permit conditions.

BMP #6.1 – Pollution Prevention/Good Housekeeping for Municipal Operations

The County has developed Pollution Prevention/Good Housekeeping for Municipal Operations Standard Operating Procedure (Pollution Prevention SOP). The Pollution Prevention SOP provides good housekeeping procedures for the following activities:

- Municipal Facilities
- Parking Lot Maintenance
- Vehicle/Equipment Maintenance
- Ground Maintenance
- Utility Maintenance

The SOPs include the specific County departments and authority figures responsible for implementing the good housekeeping procedures at each facility identified.

Roles and Responsibilities

- DPW-EP is responsible for the overall coordination regarding Pollution Prevention SOP implementation across the County.
- F&R is responsible to implement the applicable Pollution Prevention SOPs as part of daily operations.
- PRCF is responsible to implement the applicable Pollution Prevention SOPs as part of daily operations.
- DPU is responsible to implement the appropriate Pollution Prevention SOPs as part of daily operations.
- DPW is responsible to implement the appropriate Pollution Prevention SOPs as part of daily operations.

Necessary Reference Materials and Documents

Pollution Prevention/Good Housekeeping for Municipal Operations Standard Operating Procedures BMP #6.2 – Stormwater Pollution Prevention Plans (SWPPP)

The County has identified ten (10) high priority municipal facilities with the high potential to discharge pollutants and are located within the 2010 UA in its Stormwater Pollution Prevention Plan Implementation Final Report. The County has not not identified any high priority municipal facilities for which a SWPPP was not developed. Individual SWPPPs were created for each of the facilities that include:

- A site description including a site map identifying all outfalls, direction of stormwater flows, existing source controls, and receiving water bodies (when appropriate);
- A photo log of potential pollutant sources;
- A record of potential nonstormwater discharge;
- Applicable County SOPs to reduce/prevent pollutant discharges;
- An employee training schedule;
- Procedures and checklists for conducting annual comprehensive site compliance evaluations;
- A schedule for site specific source control inspections and maintenance; and
- Individual logs to record
 - Additional potential pollutant sources and recommended management practices
 - Additional non-stormwater discharges
 - Annual evaluation results and SPPPP revisions
 - Maintenance conducted
 - Spills, releases and discharges.

Original copies of the individual SWPPPs are housed in the Reference Library. Hard copies are maintained at each individual facility for ease in individual record keeping and documentation.

Roles and Responsibilities

- DPW-EP is responsible for coordination with each individual high-priority County facility to ensure that SWPPPs are being implemented and the SWPPP document is being maintained.
- DPW-EP is responsible to coordinate annual review of any identified high priority County facilities for which a SWPPP has not been developed and implemented to determine the potential for pollutant discharge.
- PRCF is responsible for the day-to-day implementation and implementation of the SWPPPs including the annual evaluation and documentation of activities.

Necessary Reference Materials and Documents

- Stormwater Pollution Prevention Plan Implementation Final Report
- Individual SWPPPs for High Priority County Facilities identified in Appendix 3.

BMP #6.3 – Nutrient Management Plans (NMPs)

The County has identified and developed NMPs for County locations where nutrients are applied on a contiguous area greater than one acre. The locations for which NMPs have been implemented are found in Appendix 4. PRCF implements the individual NMPs on County facilities, including maintaining all documentation required to demonstrate compliance. Original copies of the current NMPs are housed on the Reference Library. NMP hardcopies are maintained at the PRCF offices for ease in individual NMP record keeping and documentation.

NMPs must be reviewed and updated every three years by a nutrient planner certified by the Virginia Department of Conservation and Recreation.

Roles and Responsibilities

- PRCF is responsible for implementation of the NMPs at the County facilities identified in Appendix 4. PRCF is also responsible for maintaining documentation required to demonstrate compliance with the NMPs.
- DPW-EP is responsible to ensure that NMPs are renewed and updated prior to their expiration date.

Necessary Reference Materials and Documents

- Individual NMPs for County facilities identified in Appendix 4.

BMP #6.4 – Pollution Prevention/Good Housekeeping for Municipal Operations Training

The County developed the Pollution Prevention/Good Housekeeping for Municipal Operations Training Plan to address training requirements in the MS4 General Permit. This training plan outlines the training requirements and schedules for employees regarding:

- Recognition and reporting of illicit discharges
- Good housekeeping and pollution prevention practices that are employed during road, street and parking lot maintenance
- Good housekeeping and pollution prevention practices that are employed in and around maintenance and public works facilities
- Obtaining proper certifications and training for employees and contractors who apply pesticides and herbicides
- Obtaining proper DEQ-certifications (ESC and SWM) for plan reviewers, inspectors, program administrators and construction site operators
- Good housekeeping and pollution prevention practices that are employed in and around recreational facilities
- Ensuring emergency response employees are trained in spill response

Roles and Responsibilities

- DPW-EP is responsible for the overall coordination regarding SOP implementation across the County. DPW-EP is responsible for keeping current copies of DEQ-certifications of all employees or contractors who are responsible for plans review, site inspections and administration of the County's VESCP and VSMP.

- DPU is responsible to ensure that training is provided to DPU employees regarding the appropriate topics in accordance with the training schedule.
- DPW is responsible to ensure that training is provided to DPW employees regarding the appropriate topics in accordance with the training schedule.
- DPZ is responsible to ensure that training is provided to DPZ employees regarding the appropriate topics in accordance with the training schedule.
- F&R is responsible to ensure that training is provided to F&R employees regarding the appropriate topics in accordance with the training schedule.
- PRCF is responsible to ensure that training is provided to PRFC employees regarding the appropriate topics in accordance with the training schedule.
- SO is responsible to ensure that training is provided to SO employees regarding the appropriate topics in accordance with the training schedule.

Departments who apply pesticides and herbicides are responsible for keeping current copies of Virginia Department of Agriculture and Consumer Services (VDACS) Pesticide and Herbicide Applicator certifications of all employees or contractors who apply pesticides and herbicides for the County. Copies of the certifications should be made available to DPW-EP upon request.

In addition, all Departments are responsible for completing and submitting to DPW-EP a Training Attendance Form (available from DPW-EP) that includes the date of the training session, the trainer, the topics covered and the names of the employees who attend the training.

Necessary Reference Materials and Documents

- Pollution Prevention/Good Housekeeping for Municipal Operations Training Plan

BMP #6.5 – Contractor Language

Individual County Departments work with the County Purchasing Department to ensure that necessary language regarding environmental laws, regulations, certifications and SOPs are incorporated into County contracts.

Roles and Responsibilities

- DPW-EP is responsible for coordinating with individual County Departments, the County Attorney’s Office and the County Purchasing Department to ensure necessary stormwater-related contract language is included in contracting documents.

Necessary Reference Materials and Documents

- N/A

4.6.3 Specifically Identified MS4 General Permit Compliance Dates and Schedules

Table 19 contains the dates and schedules specific to complying with the permit conditions associated with MCM #6 that are in the MS4 General Permit.

Table 19. MS4 General Permit Compliance Dates Pertaining to MCM #6

Due Date	Requirement
6/30/19	The County must review any high-priority County facility for which a SWPPP has not been developed to determine if the high-priority facility has a high-potential to discharge pollutants.
12/31/19	The County must have completed development a SWPPP for any facility identified in the high-priority facility review for which it has been determined has a high-potential to discharge pollutants.
6/30/20	The County must review any high-priority County facility for which a SWPPP has not been developed to determine if the high-priority facility has a high-potential to discharge pollutants.
12/31/20	The County must have completed development a SWPPP for any facility identified in the high-priority facility review for which it has been determined has a high-potential to discharge pollutants.
6/30/21	The County must review any high-priority County facility for which a SWPPP has not been developed to determine if the high-priority facility has a high-potential to discharge pollutants.
12/31/21	The County must have completed development a SWPPP for any facility identified in the high-priority facility review for which it has been determined has a high-potential to discharge pollutants.
6/30/22	The County must review any high-priority County facility for which a SWPPP has not been developed to determine if the high-priority facility has a high-potential to discharge pollutants.
12/31/22	The County must have completed development a SWPPP for any facility identified in the high-priority facility review for which it has been determined has a high-potential to discharge pollutants.
6/30/23	The County must review any high-priority County facility for which a SWPPP has not been developed to determine if the high-priority facility has a high-potential to discharge pollutants.
12/31/23	The County must have completed development a SWPPP for any facility identified in the high-priority facility review for which it has been determined has a high-potential to discharge pollutants.

4.6.4 Annual Reporting Requirements

Note: Under the MS4 General Permit, tracking and reporting requirements apply to only projects that are served by the County’s MS4.

The MS4 General Permit requires that the items specific to MCM #6 identified in Table 20 be reported as part of the MS4 Annual Report.

Table 20. MS4 Annual Report Reporting Item Requirements Specific to MCM #6

MCM #6 Required MS4 Annual Report Reporting Item
A summary of any SOPs developed or modified during the reporting period
A summary of any new SWPPPs developed during the reporting period
A summary of any new turf and landscape NMP that includes: <ul style="list-style-type: none"> ▪ Location of each land area ▪ Total acreage of each land area ▪ Date of the approved NMP
A list of the conducted training events including: <ul style="list-style-type: none"> ▪ Date of each training event ▪ Number of employees attending each training event ▪ Objective of each training event

CHAPTER 5. ASSURING COMPLIANCE WITH TOTAL MAXIMUM DAILY LOAD (TMDL) SPECIAL CONDITIONS

DEQ evaluates Virginia waterbodies (i.e., streams, reservoirs and estuaries) on a biennial basis as part of the 305(b)/303(d) Water Quality Assessment process. Individual waterbodies are categorized based on whether they meet the State-adopted water quality standards. Those that do not meet the water quality standards are considered impaired. A subset of the impaired waterbodies undergoes a more thorough evaluation involving long-term monitoring and computer modeling known as a Total Maximum Daily Load (TMDL) study. Each TMDL study identifies source (pollutant) that is causing the waterbody impairment and calculates the maximum pollutant load that can be introduced into the waterbody without causing the impairment. The allowable pollutant load is then divided up between non-regulated non-point dischargers such as undeveloped lands and agriculture and regulated point source discharges including MS4s. The MS4 General Permit Part II contains two (2) Special Conditions which are applicable to County MS4 discharges:

- Chesapeake Bay TMDL Special Condition (MS4 General Permit Line 814 – 928)
- Local TMDL Special Condition (MS4 General Permit Line 929 – 1003)

The County is required to address applicable MS4 General Permit Special Permit conditions through development and implementation of action plans for each applicable TMDL. TMDL action plans identify the means and methods that the County will utilize to meet the Special Conditions pertaining to the pollutant load.

5.1 Chesapeake Bay TMDL for Nitrogen, Phosphorus, and Sediment

The Chesapeake Bay TMDL Special Condition requires that the County develop and maintain a Chesapeake Bay TMDL Action Plan that addresses nitrogen, phosphorus, and sediment (i.e., pollutants of concern or POC) from:

- Transitional Sources
- New Sources
- Nutrient Application on County Facilities
- Existing Sources

The County submitted its original Phase I Chesapeake Bay TMDL Action Plan to DEQ on June 30, 2015 and submitted an updated version on June 30, 2016. The Phase I TMDL Action Plan described the County's means and methods for complying with the 2013 MS4 General Permit Chesapeake Bay TMDL Special Condition. A copy of the Phase I Chesapeake Bay TMDL Action Plan is available in the Reference Library.

The County is required to develop and implement a Phase II Chesapeake Bay TMDL Action Plan to DEQ by October 30, 2019, which defines the means and methods by which the County will comply with the current MS4 General Permit. The Phase II Chesapeake Bay TMDL Action Plan will include the BMPs and strategies selected by the County, as well as identify the responsible departments, necessary materials and documents and other information necessary to comply with the Chesapeake Bay TMDL Special Condition. Upon development, public comment and submittal to DEQ, the Phase II TMDL Action Plan will be available in the Reference Library.

5.1.1 Specifically Identified MS4 General Permit Compliance Dates and Schedules

The following compliance items regarding the Chesapeake Bay TMDL Special Condition are required to be met during the MS4 General Permit reporting cycle (Table 21):

Table 21. MS4 General Permit Compliance Dates Pertaining to the Chesapeake Bay TMDL Special Condition

Due Date	Compliance Item
Prior to 10/30/19	Provide an opportunity for the public to comment on the additional BMPs proposed to meet the required POC reductions for no less than 15-days
10/30/19	Submit an updated Phase II Chesapeake Bay TMDL Action Plan
10/30/23	Reduce the POC load from Existing Sources served by the County MS4 within the 2010 UA by at least 40% of the L2 Scoping Run (Defined in the Phase II TMDL Chesapeake Bay Action Plan)
10/30/23	Offset 40% of the increased POC loads from new sources that initiated construction between July 1, 2009 and June 30, 2014 that resulted in a land disturbance one acre or greater and the resulting phosphorus load was greater than 0.45 lb./acre/year.
10/30/23	Offset the increased POC loads from new sources that initiated construction after July 1, 2014 that resulted in a land disturbance one acre or greater and the resulting phosphorus load was greater than 0.45 lb./acre/year.

5.1.2 Annual Reporting Requirements

The County’s MS4 Annual Report to DEQ must include the items regarding the Chesapeake Bay TMDL Action Plan identified in Table 22.

Table 22. MS4 Annual Report Reporting Item Requirements Specific to the Chesapeake Bay TMDL Special Condition

MS4 Annual Report Required Chesapeake Bay TMDL Action Plan Items
A list of BMPs implemented during the reporting period but not reported to the DEQ BMP warehouse as part of VSMP implementation.
If credits were obtained, a statement that credits were acquired during the reporting period to meet all or a portion of the required POC reductions identified in the Phase II Chesapeake Bay Action Plan.
The progress, using the final design efficiency of the BMPs, toward meeting the required cumulative reductions for each of the POC – nitrogen, phosphorus and sediment.
A list of BMPs that are planned to be implemented during the next reporting period.

5.2 Local TMDLs

Numerous receiving waters including stream, rivers, reservoirs and estuaries have been identified as impaired for not meeting its specified designated uses as specified in Virginia’s Water Quality Standards. For many of the receiving waters that are considered impaired, DEQ has developed local TMDLs to restore and maintain water quality in order ensure that the specified designated uses are met. The MS4 General Permit has integrated the TMDL requirements into the Local TMDL Special Condition and are based upon the source of the local receiving water impairment and the TMDL publication date.

5.2.1 Local TMDLs Applicable to the County MS4

For the County, there are three (3) applicable TMDLs for which it must comply with the MS4 General Permit Local TMDL Special Condition:

- Bacterial TMDL for the Tidal Freshwater Rappahannock River Watershed which was approved by EPA on May 5, 2008;
- Bacteria TMDL Development for Tributaries to the Potomac River Located within Prince William and Stafford Counties, which was approved by EPA on September 26, 2013; and
- TMDLs of Polychlorinated Biphenyls (PCBs) for Tidal Portions of the Potomac and Anacostia Rivers in the District of Columbia, Maryland, and Virginia, which was approved by EPA on October 31, 2007.

5.2.1.1 Bacteria TMDL for the Tidal Freshwater Rappahannock River Watershed

The County developed the Bacteria TMDL Action Plan, dated June 30, 2016 and approved by DEQ on December 2, 2016 to address the Bacteria TMDL for the Tidal Freshwater Rappahannock River Watershed. A copy of the approved TMDL Action Plan is available in the Reference Library.

The County is required to update the Bacteria TMDL Action Plan by May 1, 2020 to define the means and methods by which the County will comply with the Local TMDL Special Condition in the current MS4 General Permit. The updated Bacteria TMDL Action Plan will include the BMPs and strategies selected by the County, as well as identify the responsible Departments, necessary materials and documents, annual reporting requirements and other information necessary to comply with the Local TMDL Special Condition for bacteria. Upon development, the updated Bacteria TMDL Action Plan will be available in the Reference Library.

5.2.3.2 TMDLs of PCBs for Tidal Portions of the Potomac and Anacostia Rivers in the District of Columbia, Maryland, and Virginia

The County is required to update the existing PCB TMDL Action Plan by May 1, 2020 to define the means and methods by which the County will comply with the Local TMDL Special Condition. The PCB TMDL Action Plan will include the BMPs and strategies selected by the County, as well as identify the responsible Departments, necessary materials and documents, annual reporting requirements and other information necessary to comply with the Local TMDL Special Condition for bacteria. Upon development, the updated PCB TMDL Action Plan will be available in the Reference Library.

5.2.3.3 Bacteria TMDL Development for Tributaries to the Potomac River Located within Prince William and Stafford Counties

The County is required to develop a TMDL Action Plan to address the Bacteria TMDL Development for Tributaries to the Potomac River, Located within Prince William and Stafford Counties. As the TMDL was developed after July 1, 2013, the TMDL Action Plan will be the initial County document regarding Bacteria TMDL for the Tributaries to the Potomac River Located within Prince William and Stafford Counties.

The new TMDL Action Plan will define the means and methods by which the County will comply with the Local TMDL Special Condition and will include the BMPs and strategies selected by the County, as well as identify the responsible Departments, necessary materials and documents and other information necessary. Upon development, the TMDL Action Plan will be available in the Reference Library.

5.2.2 Specifically Identified MS4 General Permit Compliance Dates and Schedules

Table 23 contains applicable MS4 General Permit compliance dates regarding the development and modification of County local TMDL Action Plans.

Table 23. MS4 General Permit Compliance Dates Pertaining to the Local TMDL Special Condition

Due Date	Compliance Item
5/1/2020	The County must update the previously approved Bacterial TMDL Action Plan for the Bacterial TMDL for the Tidal Freshwater Rappahannock River Watershed to meet the conditions of the MS4 General Permit Local TMDL Special Condition. Prior to submission to DEQ, the County must provide a minimum of 15-days for the public to provide comment on the proposed TMDL Action Plan.
5/1/2020	The County must update the PCB TMDL Action Plan for the TMDLs of PCBs for Tidal Portions of the Potomac and Anacostia Rivers in the District of Columbia, Maryland, and Virginia to meet the conditions of the MS4 General Permit Local TMDL Special Condition. Prior to submission to DEQ, the County must provide a minimum of 15-days for the public to provide comment on the proposed TMDL Action Plan.
5/1/2021	The County must develop and implement a TMDL Action for the Bacteria TMDL Development for Tributaries to the Potomac River, Located within Prince William and Stafford Counties. Prior to submission to DEQ, the County must provide a minimum of 15-days for the public to provide comment on the proposed TMDL Action Plan.

5.2.3 Annual Reporting Requirements

The County’s MS4 Annual Report to DEQ must include the items regarding local TMDL Action Plan implementation identified in Table 24.

Table 24. MS4 Annual Reporting Requirements Associated with the Local TMDL Special Condition

MS4 Annual Report Required Local TMDL Action Plan Items
A summary of action conducted to implement each TMDL Action Plan.

CHAPTER 6. MS4 PROGRAM PLAN MEASURABLE GOALS

The MS4 General Permit requires that the County:

- Identify the measurable goal by which each BMP or strategy will be evaluated;
- Review the County’s program implementation of BMPs and strategies to determine the MS4 program’s effectiveness; and
- Identify any necessary changes in the County’s program implementation.

For review and evaluation, the County will utilize the measurable goals identified in Table 25 to evaluate the effectiveness of the County program and determine whether changes to the program are required.

Table 25. Measurable Goals for Determining MS4 Program Effectiveness

MCM	BMP #	Measurable Goals
1	BMP #1.1	The County will identify three high-priority stormwater issues for meeting the goal of educating the public.
		The County will use a minimum of two (2) strategies listed in the MS4 General Permit Table 1 annually to communicate to the public the high-priority identified high priority issues.
2	BMP #2.1	The County will maintain an up-to-date website that provides access to, and the ability to provide comment on, MS4 Program information including the MS4 Program Plan, MS4 Annual Reports, TMDL Action Plans and public involvement and participation opportunities.
		The County will continue to provide mechanisms for the public to report complaints regarding potential illicit discharges, improper disposal or spills to the MS4; complaints regarding land disturbing activities or other potential stormwater pollution concerns.
	BMP #2.2	The County will annually implement a minimum of four (4) public involvement activities selected from at least MS4 General Permit Table 2 categories.
3	BMP #3.1	The County will maintain MS4 outfall and SWM Facility/BMP records in accordance with County policies and procedures.
		The County will provide DEQ the required MS4 map and outfall information table as required during PY01 and within 14-days of DEQ-request throughout the permit cycle.
	BMP #3.2	The County will notify MS4 operators of any newly constructed or identified physical interconnections.
	BMP #3.3	The County will implement the IDDE SOPs, including conducting annual dry weather MS4 outfall screening, to continue to identify and eliminate illicit discharges into the MS4.

MCM	MCM #1	Measurable Goals
4	BMP #4.1	The County will implement a VESCP that is consistent with the Virginia Erosion and Sediment Control Law and the Virginia Erosion and Sediment Control Regulations.
		The County VESCP will be administered by a DEQ-certified administrator.
		VESCP plan review and approval will be conducted by DEQ-certified plan reviewers.
		VESCP inspections will be conducted by DEQ-certified inspectors.
5	BMP #5.1	The County will implement a VSMP that is consistent with the Virginia Stormwater Management Act and Regulation.
	BMP #5.2	The County will inspect County-owned SWM facilities and BMPs on an annual basis.
	BMP #5.3	The County will maintain County-owned SWM facilities and BMPs in accordance with the County Owned/Operated SWM Facility Inspection and Maintenance Procedures.
6	BMP #6.1	Privately-owned SWM facilities will be inspected on a two-year rotational basis.
	BMP #6.2	The County will implement the Pollution Prevention SOPs as part of its overall daily operations throughout the MS4 Service Area.
	BMP #6.3	The County will implement and maintain SWPPPs on high-priority municipal facilities located within the MS4 Services Area.
	BMP #6.4	The County will implement and maintain NMPs on County facilities located within the MS4 Service Area where nutrients are applied to greater than one contiguous acre.
	BMP #6.5	The County will conduct training on the schedule provided in the Pollution Prevention/Good Housekeeping for Municipal Operations Training Plan.
		The County will include appropriate language in contractual documents to ensure that necessary permits and certifications are obtained and that required pollution prevention efforts are implemented.

CHAPTER 7. RECORD OF MS4 PROGRAM PLAN REVISIONS

Revisions to the MS4 Program Plan are expected throughout the live of the MS4 General Permit as part of the iterative process to reduce pollutant loading and protect water quality to the MEP. The County must summarize revisions to the MS4 Program Plan as part of the MS4 Annual Report. The Reference Library contains an excel spreadsheet to assist DPW-EP in tracking and documenting modifications to the MS4 Program Plan. The spreadsheet provides for the recording of the following information:

- Date of Revision
- MS4 Program Plan
 - Chapter
 - Page Number
- Revision Description
- Revision Effective Date

The County should annually incorporate MS4 Program Plan updates into an updated MS4 Program Plan version in conjunction with development of its MS4 Annual Report.

APPENDICES

1. VPDES General Permit for Stormwater Discharges from Small MS4s
2. Stafford County Reference Library
3. High-Priority County Facilities with Stormwater Pollution Prevention Plans
4. County Facilities with Nutrient Management Plans