

**VPDES MUNICIPAL SEPARATE STORM SEWER  
SYSTEM (MS4) PERMIT  
VAR040039**

**ANNUAL REPORT  
PERIOD JULY 1, 2022, TO JUNE 30, 2023**

**THE COLLEGE OF WILLIAM & MARY**



**WILLIAM & MARY**

CHARTERED 1693

***September 30, 2023***

***TRC Project No. 551304***

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**1. SIGNED CERTIFICATION AS PER PART III K:**

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.

 9/26/23  
Responsible Official Signature Date

**Samuel Hayes III, P.E.**  
Associate VP for Facilities Management / Chief Facilities Officer

**VAR040039**  
Permit Number

**College of William and Mary**  
MS4 Name

**2. INTRODUCTION**

The College of William and Mary (university) was originally issued an MS4 permit in 2003 by the Commonwealth of Virginia. This permit outlines minimum requirements for the operation of the university's storm sewer system, including storm water treatment systems (BMPs), and it is reissued every five years. The College's current permit number is VAR040039, and the permit cycle duration is from November 1, 2018, to October 31, 2023. The permit mandates an annual report to be submitted to the Virginia DEQ by October 1<sup>st</sup> during the permit cycle, detailing progress in meeting permit requirements from July 1<sup>st</sup> to June 30<sup>th</sup> of the previous year. This annual report encompasses the College's progress in meeting the permit requirements for the period from July 1, 2022, to June 30, 2023.

### 3. ANNUAL REPORTING REQUIREMENTS - COMPLIANCE SUMMARY

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

*Part I Section D2*

1. *The permittee shall submit an annual report to the department no later than October 1 of each year in a format as specified by the department. The report shall cover the previous year from July 1 to June 30.*

**Response: Understood! It is noted that the College of William & Mary (CWM) submits its annual report to the DEQ no later than October 1 of each year. This annual report specifically covers the period from July 1, 2022, to June 30, 2023.**

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

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

**Response: The permittee & system name: The College of William and Mary (CWM)**

**Permit number: VAR040039**

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

**Response: July 1, 2022, to June 30, 2023**

c) *A signed certification as per Part III K.*

**Response: See section 1 on page 2 for signed certification.**

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

**Response: See section 4 on page 5 for specified annual reporting items for each MCM.**

e) *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 necessary.*

**Response: The College of William & Mary received a warning letter (W2023-06-T-1001) dated June 2, 2023, from the DEQ. The DEQ conducted an audit of CWM's MS4 program from April 17, 2023, to May 11, 2023, and the audit report was included with the warning letter. Consequently, to address the audit comments and achieve full compliance with the current permit requirements, CWM revised and updated its MS4 program plan in September 15, 2023.**

3. *For permittees receiving initial coverage under this general VPDES permit for the discharge of stormwater, the annual report shall include a status update on each component of the MS4 program plan being developed. Once the MS4 program plan has been updated to include implementation of a specific MCM in Part I E, the permittee shall follow the reporting requirements established in Part I D 2.*

**Response: CWM currently holds permit number VAR040039. CWM's annual report adheres to the reporting requirements outlined in Part I D 2.**

4. *For those permittees with requirements established under Part II A, the annual report shall include a status report on the implementation of the Chesapeake Bay TMDL action plan in accordance with Part II A of this permit including any revisions to the plan.*

**Response: This annual report includes a status report on the implementation of the Chesapeake Bay TMDL action plan in accordance with Part II A of this permit. See section 5.0 of this annual report on page 18 for Chesapeake Bay TMDL action plan status report.**

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

**Response: This annual report includes a status report on the implementation of the local TMDL action plan in accordance with Part II B of this permit. See section 6.0 of this annual report on page 19 for local TMDL action plan status report.**

6. *For the purposes of this permit, the MS4 program plan and annual report shall be maintained separately and submitted to the department as required by this permit as two separate documents.*

**Understood! The MS4 program plan and annual report are maintained as two separate documents are submitted to the department as two separate documents.**

## **4. MINIMUM CONTROL MEASURES REPORTING**

### **4.1. Public Education and Outreach**

The Public Education and Outreach Program at CWM seeks to alert residents, students, faculty, and staff on the impacts of stormwater runoff on water quality through various communication channels. It provides guidance on how the community can help in minimizing adverse impacts of urban runoff in waterways. CWM utilizes existing programs, organizations, boards, and committees within the community to implement public education activities. The Public Education and Outreach program at CWM uses existing forums and outreach materials established by EPA, local, and adjacent MS4 jurisdictions. These materials are widely distributed by Mason staff members at various events and meetings.

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

#### *Part I section E-1-g*

*g. The annual report shall include the following information:*

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

**Response: The high priority water quality issues identified and addressed in the Public Education and Outreach Program by CWM are: Nutrient Management, Erosion Control, and Plastics Diversion.**

2. *A list of the strategies used to communicate each high-priority stormwater issue.*

**Response: The permit requires two or more of the following strategies per year to communicate to the public the high-priority stormwater issues identified above: traditional written materials, alternative materials, signage, media materials, speaking engagements, curriculum materials, and training materials. Below is a summary of activities with required information:**

<b>High-Priority Water Quality Issue</b>	<b>Education and Outreach Activities</b>	<b>Target Audience</b>	<b>Percentage of Target Audience Reached</b>	<b>Documentation</b>
Nutrients Management (Includes water chemistry)	Staff Training	Grounds supervisors and Turf Mgmt. Staff -15 personnel	100% of staff trained	Training records available upon request
Erosion Control	ESC Briefings prior to start of Construction	Contractors	100% of Contractor representatives for construction projects over 2,500 sf land disturbance	Approved Erosion & Sediment Control Plans available upon request. ESC inspection reports available upon request.
Plastics Diversion	Seminars	Students – 8,500 Faculty & staff – 3,900	100% of students, faculty, and staff	Campus-wide recycling containers and events (1)

(1) <https://www.wm.edu/offices/sustainability/initiatives/recycling/>

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

#### 4.2. Public Involvement and Participation

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

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

*Part I section E-2-f*

*f. The annual report shall include the following information:*

- 1. A summary of any public input on the MS4 program received (including stormwater complaints) and how the permittee responded.*

**Response: No public input was received during the reporting cycle.**

- 2. A webpage address to the permittee's MS4 program and stormwater website.*

**Response: CWM - FM has developed a website dedicated to water quality and stormwater management [Stormwater Management | William & Mary \(wm.edu\)](https://www.wm.edu/stormwater). The site provides public access to documents such as CWM's MS4 Permit, the MS4 program plan, annual reports, and TMDL action plans. It provides a mechanism for the public to report potential illicit discharge, improper disposal, spills to MS4, complaints regarding the land disturbing activities and/or other potential stormwater pollution concerns. Contact information and th**

**e online reporting toll are available on the website for the public to provide inputs on the MS4 program.**

3. *A description of the public involvement activities implemented by the permittee.*

**Response: The permit requires the College to implement no less than four activities per year from two or more of the following categories: monitoring, restoration, educational events, disposal or collection events, and pollution prevention. The university implemented the educational events following local activities:**

**Monitoring**

- **Keck Environmental Lab provided quarterly sampling of water quality from 24 streams, ponds, and tidal creeks in the College Creek watershed, including College Creek, Tinkling Rill, and Lake Matoaka**
- **Earth Week Activities, April 16 - 22, 2023**
- **Students conducted field lab exercises in the three stormwater ponds as part of Watershed Dynamics Course**

**Disposal or Collection Events**

- **Campus Race to Zero Waste Annual Tournament, includes electronics recycling.**
- **Hazardous Waste Pickup, for waste generated by college facilities, ongoing program, picks up daily.**
- **Recycling Program, manages collection from recycling and compost containers throughout campus, includes paper, cardboard, plastics #1-7, aluminum, steel, glass, milk & juice cartons. Dedicated locations are established for small electronics, ink cartridges, plastic bags, batteries, and light bulbs.**

4. *A report of the metric as defined for each activity and an evaluation as to whether the activity is beneficial to improving water quality; and*

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

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

**Response:** CWM FM did not collaborate with other MS4 permittees on the activities shown above.

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

#### **4.3. Illicit Discharge Detection and Elimination (IDDE)**

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

CWM FM maintains stormwater system maps and publishes interactive stormwater maps using online GIS. The complete MS4 maps with outfall information table are available upon request. CWM FM performs dry weather screening (outfall reconnaissance) once a year on the outfalls to identify possible illicit

connections and discharges, as well as, to keep track of all existing stormwater management facilities and structures within the MS4 boundary. During the outfall reconnaissance, outfalls are evaluated for structural damages or uncommon conditions that might indicate the present of pollutants. In addition, outfalls are inspected for maintenance necessity to avoid detrimental conditions on stream banks and bed.

Mason has interconnections with the stormwater system operated by City of Williamsburg, James City County, York County, and VDOT.

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

Part I Section E-3-e

*e. The annual report shall include:*

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

**Response: CWM's stormwater system maps and information table have been updated to reflect the current site condition including any changes to the MS4 occurring on or before June 30 of this reporting year.**

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

**Response: CWM screened all its 55 outfalls during this reporting year as part of the dry weather screening program (outfall reconnaissance) and no illicit discharges were identified during the outfall reconnaissance.**

3. *A list of illicit discharges to the MS4 including spills reaching the MS4 with information as follows:*
  - a. *The source of illicit discharge.*

- b. The dates that the discharge was observed, reported, or both.*
- c. Whether the discharge was discovered by the permittee during dry weather screening, reported by the public, or other method (describe).*
- d. How the investigation was resolved.*
- e. A description of any follow-up activities; and*
- f. The date the investigation was closed.*

**Response: CWM received a report for a potential illicit discharge incident from DEQ Mr. David Taylor, Regional MS4 & Pretreatment Coordinator, during his site visit while auditing CWM's MS4 program. It was observation 7 in the audit report/warning letter (W2023-06-T-1001) dated June 2, 2023. An investigation by College staff on 6/8/23 confirmed the presence of the stain and determined that the trench drain is connected to the sanitary sewer and not the storm sewer. The waste vendor has provided a work order to correct the leak and remove this illicit discharge. The investigation was closed on 6/8/2023.**

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

#### **4.4. Construction Site Stormwater Runoff Control**

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

CWM implements appropriate controls to prevent non-stormwater discharges to the MS4, such as wastewater, concrete washout, fuels and oils, and other illicit discharges identified during land disturbing activity inspections of the MS4.

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

Part I section E-4-d

*d. The annual report shall include the following:*

1. *If the permittee implements a construction site stormwater runoff program in accordance with Part I E 4 a (3):*
  - a. *A confirmation statement that land disturbing projects that occurred during the reporting period have been conducted in accordance with the current department approved standards and specifications for erosion and sediment control; and*
  - b. *If one or more of the land disturbing projects were not conducted with the department approved standards and specifications, an explanation as to why the projects did not conform to the approved standards and specifications.*

**Response: All land disturbing projects that occurred during the reporting period have been conducted in accordance with DEQ approved Annual Standards and Specifications for Erosion and Sediment Control and Stormwater Management. CWM continues to progress on improvements that will benefit campus community members for decades to come, and transform facilities for students, staff, faculty, and visitors. During the reporting period, CWM had four active construction projects in campus. Locations of current and future projects are available on CWM [Facilities Management website](#). For all active construction projects listed below, CWM FM staff performed regular inspections during report period to ensure that erosion and sediment controls and stormwater management facilities & BMPs were properly im**

plemented, installed, and maintained during the construction. Issues and violations observed during inspection were photographed and documented in the inspection reports. In addition, required corrective actions for each issue or violation were specified and with a date by which all corrective actions must be completed. The inspection reports were sent to the Contractor, Project Managers, CWM FM and other responsible parties within 24 hours of inspection and follow-up inspections were performed when necessary.

Construction Project	Project Schedule	# of Inspections in reporting period	Enforcement actions
Fine & Performing Arts	Through June 23	3-4	0
Muscarella Museum	Through Oct 24	6-8	0
ISC Phase 4	Through Aug 25	6-8	0
Kaplan Arena Addition	Through Dec 25	6-8	0

2. *Total number of inspections conducted; and*

**Response: Total number of inspections conducted by CWM FM staff in the reporting period are shown in the table above.**

3. *The total number and type of enforcement actions implemented and the type of enforcement actions.*

**Response: As the university is the contract holder for all the land disturbance activities on campus and the ESC inspector represents the university, any deficiencies in ESC measures or practices are resolved immediately. There were no enforcement actions taken during the reporting period.**

**MCM Evaluation: The MCM has been effective in providing compliance with the regulatory requirements. The Annual Standards and Specifications are currently being revised to provide additional clarity concerning procedures within the university for obtaining VSMP permits in a timely manner.**

**4.5. Post-Construction Stormwater Management for New Development and Development on Prior Developed Lands**

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

Part I section E-5-i

*i. The annual report shall include the following information:*

1. *If the permittee implements a Virginia Stormwater Management Program in accordance with Part I E 5 a (1) and (2):*

- a. *The number of privately owned stormwater management facility inspections conducted; and*

**Response: N/A, all stormwater management facilities are owned and maintained by the university.**

- b. *The number of enforcement actions initiated by the permittee to ensure long-term maintenance of privately owned stormwater management facilities including the type of enforcement action.*

**Response: N/A, all stormwater management facilities are owned and maintained by the university.**

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

**Response: All stormwater management facilities owned and operated by the university were inspected during the reporting period. Inspections were conducted during the reporting period for all 37 SWM/BMP facilities and 55 outfalls.**

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

**Response: No significant maintenance, repair, or retrofit activities were performed during the reporting period.**

4. *A confirmation statement that the permittee submitted stormwater management facility information through the Virginia Construction Stormwater General Permit database for those land disturbing activities for which the permittee was required to obtain coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities in accordance with Part I E 5 f or a statement that the permittee did not complete any projects requiring coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities; and*

**Response: Confirmed**

5. *A confirmation statement that the permittee electronically reported BMPs using the DEQ BMP Warehouse in accordance with Part I E 5 g and the date on which the information was submitted.*

**Response: Confirmed. The required information was sent to Matt Fanghella of DEQ on 6/28/19 (prior to this reporting period). Additional BMPs were added in June 2023 including non-regulatory BMPs converted to regulatory BMPs.**

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

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

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

*Part I section E-6-q*

*q. The annual report shall include the following:*

- 1. A summary of any operational procedures developed or modified in accordance with Part I E 6 a during the reporting period.*

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

- 2. A summary of any new SWPPPs developed in accordance Part I E 6 c during the reporting period.*

**Response: N/A. The university does not have any facilities that meet the permit criteria for high-priority facilities.**

- 3. A summary of any SWPPPs modified in accordance with Part I E 6 f or the rationale of any high priority facilities delisted in accordance with Part I E 6 h during the reporting period.*

**Response: N/A. The university does not have any facilities that meet the permit criteria for high-priority facilities.**

- 4. A summary of any new turf and landscape nutrient management plans developed that includes:*

- a. Location and the total acreage of each land area; and*

b. *The date of the approved nutrient management plan; and*

**Response: CWM has developed and implemented Turf and Landscape Nutrient Management Plans (TLNMP), which are available in FM-O&M and as Appendix E in CWM's MS4 program plan and was approved on 4/17/2018. A total of seventy acres are encompassed by nutrient management plans at the College of William & Mary. However, no new turf and landscape nutrient management plans were required to be developed during the reporting period.**

5. *A list of the training events conducted in accordance with Part I E 6 m, including the following information:*

a. *The date of the training event.*

b. *The number of employees who attended the training event; and*

c. *The objective of the training event.*

**Response: Below is a summary of training activities with required information:**

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

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

## 5. CHESAPEAKE BAY TMDL STATUS REPORT

In Part II section A-13 of the MS4 permit, the permit lists specific items to be addressed in the Annual Report. The following are the items listed in the permit in italic typeface followed by responses in bold typeface:

### Part II section A-13

13. *For each reporting period, the corresponding annual report shall include the following information:*

- a) *A list of BMPs implemented during the reporting period but not reported to the DEQ BMP Warehouse in accordance with Part I E 5 g and the estimated reduction of pollutants of concern achieved by each and reported in pounds per year.*

**Response: There were four new BMPs implemented during this reporting period. All of them have been reported to DEQ BMP Warehouse during the reporting period. The BMPs are also provide as an appendix to September 2023 revised MS4 Program Plan.**

- b) *If the permittee acquired credits during the reporting period to meet all or a portion of the required reductions in Part II A 3, A 4, or A 5, a statement that credits were acquired.*

**Response: Credits were not acquired during the reporting period**

- c) *The progress, using the final design efficiency of the BMPs, toward meeting the required cumulative reductions for total nitrogen, total phosphorus, and total suspended solids; and*

**Response: All required cumulative reductions for total nitrogen, total phosphorus, and total suspended solids have been met.**

- d) *A list of BMPs that are planned to be implemented during the next reporting period.*

**Response: There are no planned BMPs planned to be implemented during the next reporting period for compliance with the Chesapeake Bay TMDL.**

## 6. LOCAL TMDL STATUS REPORT

In Part II section B-9 of the MS4 permit, the permit lists specific items to be addressed in the Annual Report. The following are the items listed in the permit in italic typeface followed by responses in bold typeface:

*Part II section B-9*

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

**Powhatan/Mill Creek TMDL**

**The university is continuing existing efforts documented in the TMDL Action Plan. Ongoing observations of the Dillard Complex indicate that measures have been successful in preventing the deposition of pet waste.**

**Monitoring is not required, and no monitoring is currently being conducted as part of TMDL compliance.**

## 7. CONDITIONS APPLICABLE TO ALL STATE AND VPDES PERMITS

### 7.1. Reporting Monitoring Results

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

Part III section C-1

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

**Response: N/A, no monitoring took place during the reporting period.**

### 7.2. Reporting of noncompliance

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

Part III section I-3

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

*NOTE: The reports required in Part III G, H, and I shall be made to the department. Reports may be made by telephone, email, or fax. For reports outside normal working hours, leaving a recorded message shall fulfill the immediate reporting requirement. For emergencies, the Virginia Department of Emergency Management maintains a 24-hour telephone service at 1-800-468-8892.*

**Response: Understood! There were no instances of noncompliance to report during the reporting period.**

### 7.3. Signatory requirements

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

Part III section K-2

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

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

**Response: See Section 1 on page 2 of this report.**