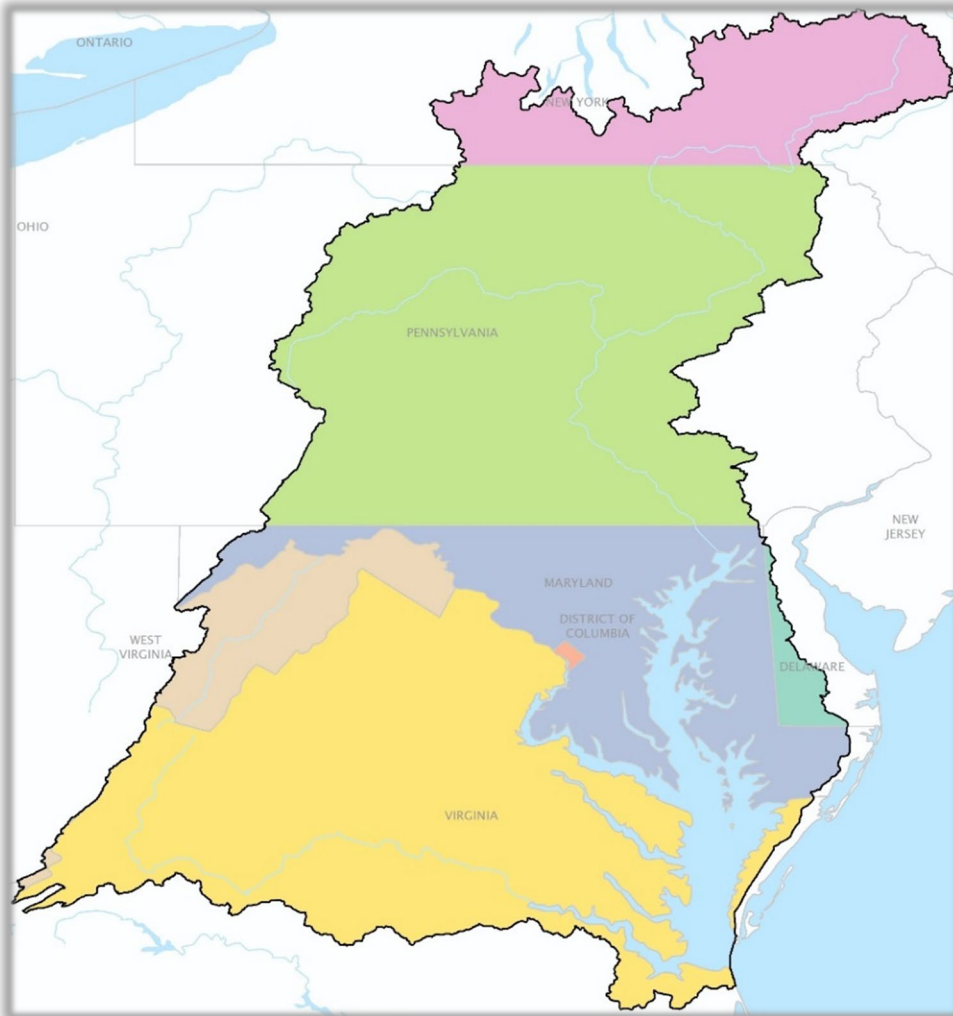


# CHESAPEAKE BAY TMDL ACTION PLAN

A Plan for Achieving 35% Reduction (40% Overall)  
in Accordance with 9VAC25 890-40.1C.5a-b

November 1, 2019



Summary of Specific Reapplication Package Requirements

2013-2018 General Permit Regulation	Document Section
Section 1.C.5.a	Section 4.1
Section 1.C.5.b.1	Section 3.5
Section 1.C.5.b.2	Section 3.5
Section 1.C.5.b.3	Section 3.5
Section 1.C.5.b.4	Section 3.5

This plan satisfies the requirements of Section I(C) of the MS4 General Permit (9VAC25-890-40) for Special Conditions for the Chesapeake Bay TMDL. This plan is consistent with the Chesapeake Bay TMDL and the Virginia Phase I and II WIPs to meet the Level 2 (L2) scoping run for existing developed lands as it represents an implementation of 5.0% and 35% of L2.

John Tyler  
Community  
College



Chester Campus



Midlothian Campus

EEE Consulting, Inc.



## **EXECUTIVE SUMMARY**

John Tyler Community College (JTCC), is authorized to discharge stormwater from its municipal separate storm sewer system (MS4) under the Virginia Pollutant Discharge Elimination System (VPDES) General Permit for Discharge of Stormwater from Small MS4s (MS4 General Permit). To maintain permit compliance, JTCC implements an MS4 Program Plan that includes best management practices (BMPs) to address six minimum control measures (MCMs) and special conditions for the Total Maximum Daily Load (TMDL) in which JTCC has been assigned a wasteload allocation (WLA). The Environmental Protection Agency (EPA) describes a TMDL as a “pollution diet” that identifies the maximum amount of a pollutant the waterway can receive and still meet water quality standards. A WLA determines the required reduction in pollutant of concern loadings from the MS4s to meet water quality standards. The MS4 General Permit serves as the regulatory mechanism for addressing the load reductions described in the TMDL, predominantly through the requirement of a TMDL Action Plan.

The Chesapeake Bay TMDL was established by the EPA on December 29, 2010 and initiated WLAs for phosphorus, nitrogen and total suspended solids. In response, the Commonwealth of Virginia developed Watershed Implementation Plans (WIPs) that, in part, identify the MS4 General Permit as a mechanism for enforcing load reductions in urban areas. Subsequently, the Commonwealth included special conditions into the latest MS4 General Permit to address the reductions required by the TMDL for the pollutants of concern. The WIPs intended the reductions to be achieved over the course of three 5-year permit cycles, with the first cycle (2013 – 2018) requiring 5% of the reductions be achieved. Reduction requirements for the following two permit cycles are anticipated to increase substantially, requiring an additional 35% and 60% of the reductions be achieved, respectively.

JTCC has developed a Draft Action Plan consistent with the Chesapeake Bay Action Plan Guidance Memo (Memo No. 15-2005) provided by the Virginia Department of Environmental Quality (DEQ). The guidance was used to determine the required pollutant load reductions and identify the means and methods for achieving pollutant load reductions required by the previous and current MS4 General Permit as shown in Table 1. A review of JTCC’s existing stormwater management facilities identified applicable pollutant reduction credits in a retention basin and an extended detention basin, both located on the Midlothian campus. These existing BMPs, combined with the implementation of street sweeping as a new BMP serve as the means and methods to achieve the required reductions. These means and methods, along with continued implementation of the JTCC MS4 Program Plan is consistent with the provisions of an iterative MS4 Program, which constitutes compliance with the MS4 General Permit standard of reducing pollutants to the maximum extent practicable.

**Table 1: Summary of POC Load Reductions**

POC	(5% Load Reduction)	(35% Load Reduction)	(40% Overall Load Reduction)
Nitrogen	2.73	19.09	21.81
Phosphorus	.60	4.20	4.80
TSS	262.65	1,838.57	2,101.22

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## Acronyms

BMP	Best Management Practice
CGP	Construction General Permit
CUA	Census Urban Area
CWA	Clean Water Act
DEQ	Virginia Department of Environmental Quality
EOS	Edge of Stream
EPA	Environmental Protection Agency
ESC	Erosion and Sediment Control
GIS	Geographic Information System
IDDE	Illicit Discharge Detection and Elimination
JTCC	John Tyler Community College
LA	Load Allocation
L2	Level 2
MCM	Minimum Control Measure
MEP	Maximum Extent Practicable
MS4	Municipal Separate Storm Sewer System
MS4 GP	General Permit for Discharge of Stormwater from Small MS4s
NMP	Nutrient Management Plan
POC	Pollutant of Concern
RLDA	Regulated Land Disturbing Activity
SWPPP	Stormwater Pollution Prevention Plan
SWM	Stormwater Management
TMDL	Total Maximum Daily Load
TSS	Total Suspended Solids
VAC	Virginia Administrative Code
VCCS	Virginia Community College System
VPDES	Virginia Pollutant Discharge Elimination System
VSMP	Virginia Stormwater Management Program
WIP	Watershed Implementation Plan
WLA	Wasteload Allocation

## Definitions

**Best Management Practices (BMPs)** are schedules of activities, prohibitions of practices, maintenance procedures, and other management practices, including both structural and nonstructural practices, to prevent or reduce the pollution of surface waters and groundwater systems.

**Census Urbanized Area (CUA)** are areas identified as urban by the United States Census Bureau. MS4 regulations only apply within CUAs.

**Existing Sources** are pervious and impervious urban land uses served by the MS4 as of June 30, 2009.

**Impervious Cover** is a surface composed of material that significantly impedes or prevents natural infiltration of water into soil.

**L2 Scoping Run** is a model run to determine required reductions from urban sources as of June 30, 2009. The L2 reductions are summarized in the following table:

Pollutant of Concern	Regulated Impervious (%)	Regulated Pervious (%)
Nitrogen	9	6
Phosphorus	16	7.25
Sediment	20	8.75

**Municipal Separate Storm Sewer System (MS4)** is a conveyance or system of conveyances including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains that are:

- Owned or operated by a federal state, city, town, county, district, association, or other public body, created by or pursuant to state law that discharges to surface waters;
- Designed or used for collecting or conveying stormwater;
- Not a combined sewer; and
- Not part of a publicly owned treatment works.

**New Sources** are pervious and impervious urban land uses served by the MS4 developed or redeveloped on or after July 1, 2009.

**JTCC MS4 Program Plan** is the guiding document of the JTCC's MS4 Program and includes best management practices to address conditions of the MS4 General Permit.

**Pollutants of Concern (POC)** are total nitrogen ("TN"), total phosphorus ("TP"), and total suspended solids ("TSS").

**Prior Developed Lands** are lands that has been previously utilized for residential, commercial, industrial, institutional, recreation, transportation, or utility facilities or structures, and that will have the impervious areas associated with those uses altered during a land-disturbing activity.

**Transitional Sources** are regulated land disturbing activities that are temporary in nature and discharge through the MS4.

## 1.0 INTRODUCTION AND PURPOSE

Mandated by Congress under the Clean Water Act (CWA), the National Pollutant Discharge Elimination System (NPDES) storm water program includes the Municipal Separate Storm Sewer System (MS4), Construction, and Industrial General Permits. In Virginia the NPDES Program is administered by the Department of Environmental Quality (DEQ) through the Virginia Stormwater Management Program (VSMP) and the Virginia Pollutant Discharge Elimination System (VPDES). John Tyler Community College (JTCC) is authorized to discharge stormwater from its MS4 under the VPDES General Permit for Discharge of Stormwater from Small MS4s (MS4 General Permit). As part of the MS4 General Permit authorization, JTCC developed and implements a MS4 Program Plan (the Plan) with best management practices (BMPs) to address the six minimum control measures (MCMs) and the special conditions for applicable total maximum daily loads (TMDLs) outlined in the MS4 General Permit. Implementation of these BMPs is consistent with the provisions of an iterative MS4 Program, which constitutes compliance with the standard of reducing pollutants to the "maximum extent practicable" or MEP.

*"JTCC's MS4 program strives to improve environmental compliance, quality and stewardship through effective management, implementation, and enforcement."*

The JTCC MS4 program strives to improve environmental compliance, quality and stewardship through effective management, implementation, and enforcement of sound technical guidelines, criteria and practices for stormwater management and erosion and sediment control. The plan presented herein demonstrates how JTCC's MS4 Program Plan addresses sediment and nutrients (nitrogen and phosphorus) in its MS4 regulated area consistent with the requirements of the Chesapeake Bay TMDL.

### 1.1 Total Maximum Daily Loads

A TMDL is the total amount of a given pollutant that a waterbody can assimilate and still meet water quality standards. Typically, TMDLs are represented numerically in three main components: Waste Load Allocations (WLAs), a Load Allocation (LA), and a Margin of Safety. A WLA is the allocated amount of pollutant from areas discharging through a pipe or other conveyance considered a point source. Point sources include sewage treatment plants, industrial facilities and storm sewer systems. In contrast, an LA is the amount of pollutant from existing non-point sources and natural background such as farm runoff and atmospheric deposition. As a point source discharge, MS4's are assigned a WLA representing the annual loading of the pollutant of concern (POC) that can be discharged from its regulated MS4 area.

## **1.2 MS4 General Permit Special Conditions**

JTCC's MS4 General Permit includes a series of special conditions that must be addressed for permit compliance where JTCC has been assigned a WLA as part of an approved TMDL. The special conditions state that any TMDL approved by the State Water Control Board (SWCB) assigning a WLA to an MS4 must be addressed by the Permittee through the measurable goals of their MS4 Program Plan.

In 1998, large portions of Chesapeake Bay and its tidal tributaries within Virginia were identified as not meeting water quality standards and listed as impaired because of excess nitrogen, phosphorus and sediment. Due to the Chesapeake Bay waters remaining on the impaired waters list, the Environmental Protection Agency (EPA) required that a TMDL be developed, which was subsequently approved on December 29, 2010.

## **1.3 Watershed Implementation Plan and Strategy for MS4s**

The Chesapeake Bay Watershed Implementation Plans (WIPs) are plans that detail how and when the six Chesapeake Bay states and the District of Columbia will meet pollutant allocations. In the Phase I and Phase II WIPs for the Chesapeake Bay TMDL, Virginia committed to a phased approach to reducing nutrients and suspended solids discharging from MS4s. The issuance of the 2013-2018 MS4 General Permit set forth special conditions required by all MS4 General Permit holders within the Chesapeake Bay watershed. In part, the special conditions require the permittee to achieve 5% of the required reductions identified in the so-called Level 2 Scoping Run from existing baseline loads by July 1, 2018. Baseline loads are defined as those occurring on June 20, 2009 and are computed using loading rates provided in the MS4 General Permit.

## **1.4 JTCC Chesapeake Bay Action Plan**

The JTCC Action Plan presented herein provides a review of the current MS4 program, which demonstrates JTCC's ability to ensure compliance with the special conditions and includes the means and methods JTCC will use to meet 5.0% of the Level 2 (L2) scoping run reduction by July 1, 2018 and 40% reductions by July 1, 2023. This Action Plan was developed to comply with the special conditions of the MS4 General Permit (9VAC25-890) and under the advisement of DEQ's Guidance Memo No. 15-2005 (DEQ Guidance), which provides background information and procedures to meet the Chesapeake Bay TMDL special condition requirements.



## 2.0 APPLICABLE OVERVIEW OF JTCC'S MS4 PROGRAM

JTCC's MS4 Permit regulates stormwater discharges from areas included within census urbanized areas (CUAs). JTCC campuses included in CUAs include the Chester and Midlothian campuses, as depicted in Appendix A. JTCC's collective efforts, as described in the JTCC MS4 Program Plan, result in significant reduction of pollutants that may be discharged from its regulated MS4. BMPs already included in the JTCC Program Plan that address sediment and nutrients impairing the Chesapeake are described in the following sections. Each subsection is provided to address the referenced special condition in the MS4 General Permit.

### 2.1 Current Program and Existing Legal Authority

As a non-traditional MS4, JTCC does not have the ability to create legal authorities and has not identified any legal authorities necessary to meet the requirements of the special conditions. However, JTCC's MS4 Program includes Minimum Control Measures (MCMs) that include policies and procedures consistent the goals of the Chesapeake Bay TMDL. A summary of the applicable MCMs is listed below to address the following special condition:

- ✓ *"A review of the current MS4 program implemented as a requirement of this state permit including a review of the existing legal authorities and the operator's ability to ensure compliance with this special condition."* [Section I(C)(2)(a)(1)]
- *MCM 1 (Public Education and Outreach)* – JTCC's MS4 Program includes a Public Education and Outreach Program (PEOP) that identifies the Chesapeake Bay TMDL pollutants of concern (POCs) as a high priority water quality issue. The PEOP is described in BMP 1.2 of the JTCC MS4 Program Plan and includes the distribution of educational materials regarding methods to reduce introduction of the POCs into stormwater runoff.
- *MCM 3 (Illicit Discharge Detection and Elimination)* – JTCC's MS4 Program includes an Illicit Discharge Detection and Elimination (IDDE) Program that includes written procedures to detect, identify, and address non-stormwater discharges, including illegal dumping, to the small MS4 with policies and procedures for when and how to use legal authorities. JTCC prohibits non-stormwater discharges into the storm sewer system through language provided within the Standards of Conduct for employees and the Student Handbook for students. IDDE BMPs are described in the Minimum Control Measure 3 BMPs in the JTCC MS4 Program Plan. The IDDE Program is effective at addressing the POCs through staff training, prohibition of illicit discharges, and annual outfall screening.
- *MCM 4 (Construction Site Runoff Control)* – JTCC's MS4 Program includes a Construction Site Runoff Control Program that includes mechanisms to ensure compliance and enforcement on regulated construction sites with implementation of the DEQ-approved "*VCCS Annual Erosion and Sediment Control and Stormwater Management Standards and Specifications.*"

The standards and specifications are consistent with the Virginia Erosion and Sediment Control and Stormwater Management Laws and Regulations and includes:

- Required plan approval prior to commencement of a regulated land disturbance activity;
- Construction site inspections and enforcement; and
- Certification of post-construction stormwater management facilities.

The Construction Site Runoff Control Program is especially effective at reducing downstream conveyance of sediment from transitional sources. Minimum Control Measure 4 BMPs in the JTCC MS4 Program Plan describe construction site runoff control BMPs.

- *MCM 5 (Post-Construction Stormwater Management)* – JTCC’s MS4 Program includes a Post-Construction SWM Program that ensures water quality criteria in the Virginia Stormwater Management Regulations has been achieved on new developments and developments on prior developed land since July 1, 2009. Included among these requirements are written policies and procedures in the VCCS Erosion and Sediment Control and Stormwater Management Standards and Specifications to ensure that stormwater management facilities are designed and installed in accordance with appropriate law and regulations. Post-construction, the Program includes schedules and written procedures to ensure long-term inspections and maintenance of stormwater management BMPs. Minimum Control Measure 5 BMPs in the JTCC MS4 Program Plan describe post-construction stormwater management BMPs.

Implementation of this program addresses the following MS4 General Permit special conditions for the Action Plan to include:

- ✓ *“The means and methods that will be utilized to address discharges into the MS4 from new sources.” [Section I(C)(2)(a)(3)]*

- *MCM 6 (Good Housekeeping)* – JTCC’s MS4 Program includes a Pollution Prevention/Good Housekeeping Program that includes policies and procedures to ensure that day-to-day operations minimize the exposure of pollutants to rainfall on campus grounds to the maximum extent practicable. The program is supported with JTCC’s Pollution Prevention & Good Housekeeping Manual and annual training for applicable staff. Minimum Control Measure 6 BMPs in the JTCC MS4 Program Plan describe pollution prevention and good housekeeping BMPs.

## 2.2 New or Modified Legal Authorities

Consistent with the MS4 General Permit, JTCC uses an iterative approach to ensure the College is minimizing the discharge of pollutants through its MS4 to the MEP. The iterative approach is implemented through the annual reporting process with the review of the effectiveness of each MS4 Program Plan BMP. BMPs are modified, as necessary, to increase effectiveness. If new or modified authorities are identified as part of the annual “measure of effectiveness” as described for each BMP in the JTCC MS4 Program Plan annual reporting, they will be reported through the annual report process. The iterative process addresses the following special condition in the MS4 General Permit:

- ✓ *“The identification of any new or modified legal authorities such as ordinances, state and other permits, orders, specific contract language, and inter-jurisdictional agreements implemented or needing to be implemented to meet the requirements of this special condition.” [Section I(C)(2)(a)(2)]*

As a non-traditional MS4, JTCC does not have the ability to create legal authorities. No new policies and procedures or modifications to existing policies and procedures were identified as necessary to meet the requirements of the special conditions. Means and methods to meet the special conditions are described in Section 4.

### 3.0 POLLUTANT OF CONCERN (POC) LOADINGS (5% AND 35%)

The MS4 General Permit requires JTCC to estimate the annual loadings and the POC load reductions (5.0% of the L2 Scoping Run and 35% of L2). To complete this requirement, JTCC determined the amount of pervious and impervious land cover for their regulated campus and input the data into the appropriate loading and reduction tables provided in the MS4 General Permit. The methodology to determine sediment and nutrient loadings and the required reductions are described in the following sub-sections.

#### 3.1 Baseline Loading Characterization

JTCC's MS4 regulated area was calculated using the JTCC property boundaries as a conservative estimate of the areas the MS4 serves. Campus boundaries were obtained from the County of Chesterfield's GIS data. The determination of regulated area was based on the 2010 CUA. Aerial photography was obtained from the 2009 Virginia Base Map Program Orthophotography Program Aerials<sup>1</sup>. The extent of pervious, impervious and forest areas as of June 30, 2009, were digitized based on the aerial imagery and best professional judgment, as depicted in Appendix A. For areas that were under construction or disturbed in the 2009 aerial imagery, current aerial images were used to determine whether the areas resulted in pervious or impervious surfaces after construction. Baseline land cover results are provided in Table 2.

**Table 2: Classification of Campus Land Cover Area (Acres)**

Land Cover	Chester Campus	Midlothian Campus
Impervious	19.1	15.8
Pervious	16.1	43.6
Forest*	20.7	57.6
Surface Water*	0.0	0.64

\* Consistent with methodology described in the DEQ Guidance, these areas are not included in the loading computations described in Section 3.2.

#### 3.2 Annual Loadings from Existing Sources

The data summarized in Table 2 was used to estimate pollutant loads from existing sources as of June 30, 2009, using the James River Basin calculation sheet for estimating existing source loads provided in the MS4 General Permit. The calculation sheet was completed for each regulated JTCC campus as provided in Tables 3 and 4 which address the following special condition:

- ✓ *“An estimate of the annual POC loads discharged from the existing sources as of June 30, 2009, based on the 2009 progress run. The operator shall utilize the applicable versions of Tables ... based*

<sup>1</sup> Virginia Base Map Program Orthophotography Program, 2009. <http://www.vita.virginia.gov/isp/default.aspx?id=8412>

*on the river basin to which the MS4 discharges by multiplying the total existing acres served by the MS4 on June 30, 2009, and the 2009 Edge of Stream (EOS) loading rate.” [Section I(C)(2)(a)(4)]*

**Table 3: Loadings from the Chester Campus**

Pollutant	Regulated Urban Land Cover	Total Existing Acres Served by MS4 (06/30/09)	2009 EOS Loading Rate (lbs/acre)	Estimated Total POC Load Based on 2009 Progress Run (lbs)	Total Load (lbs)
Nitrogen	Impervious	19.1	9.39	179.35	291.89
	Pervious	16.1	6.99	112.54	
Phosphorus	Impervious	19.1	1.76	33.62	41.67
	Pervious	16.1	0.5	8.05	
TSS	Impervious	19.1	676.94	12,929.55	14,556.94
	Pervious	16.1	101.08	1,627.39	

**Table 4: Loadings from the Midlothian Campus**

Pollutant	Regulated Urban Land Cover	Total Existing Acres Served by MS4 (06/30/09)	2009 EOS Loading Rate (lbs/acre)	Estimated Total POC Load Based on 2009 Progress Run (lbs)	Total Load (lbs)
Nitrogen	Impervious	15.8	9.39	148.36	453.13
	Pervious	43.6	6.99	304.76	
Phosphorus	Impervious	15.8	1.76	27.81	49.61
	Pervious	43.6	0.5	21.80	
TSS	Impervious	15.8	676.94	10,695.65	15,102.74
	Pervious	43.6	101.08	4,407.09	

### 3.3 5% Annual Loadings from New Sources and Grandfathered Projects

In addition to computing baseline loadings from existing conditions as of June 30, 2009, the special conditions require the determination of offsets for increased loads from development occurring on or after July 1, 2009, including grandfathered projects. No offsets are necessary for new sources since:

- Loadings from new sources are addressed with the water quality criteria in the stormwater management regulations. Water quality criteria for new sources from regulated development between July 1, 2009 and June 30, 2014 was based on an average land cover condition of 16% and therefore appropriate offsets were incorporated within the development project’s stormwater management plan.
- No JTCC projects are grandfathered.

Since no offsets for new sources are necessary, the following special conditions are addressed:

- ✓ “A list of future projects and associated acreage that qualify as grandfathered in accordance with 9VAC25-870-48.” [Section I(C)(2)(a)(10)]
- ✓ “The means and methods to offset the increased loads from new sources initiating construction between July 1, 2009, and June 30, 2014, that disturb one acre or greater as a result of the

*utilization of an average land cover condition greater than 16% impervious cover for the design of post-development stormwater management facilities. The operator shall offset 5.0% of the calculated increased load from these new sources during the permit cycle.” [Section I(C)(2)(a)(7)]*

- ✓ *“The means and methods to offset the increased loads from projects as grandfathered in accordance with 9VAC25-870-48, that disturb one acre or greater that begin construction after July 1, 2014, where the project utilizes an average land cover condition greater than 16% impervious cover in the design of post-development stormwater management facilities.” [Section I(C)(2)(a)(8)]*
- ✓ *“Implementation of the means and methods to address discharges from new sources in accordance with the minimum control measure in Section II ... related to post-construction stormwater management in new development and development of prior developed lands and in order to offset 5.0% of the total increase in POC loads between July 1, 2009, and June 30, 2014. Increases in the POC load from grandfathered projects initiating construction after July 1, 2014, must be offset prior to completion of the project.” [Section I(C)(3)(c)]*

### 3.4 Required 5% Load Reductions

The MS4 General Permit requires JTCC to reduce 5.0% of the L2 Scoping Run POC reductions for existing sources as of June 30, 2009. The required load reductions for both campuses for this permit cycle were calculated using the calculation sheet in the MS4 General Permit for determining POC reductions for the James River basin. The calculation sheets were modified with the corrected loading rates provided in DEQ’s Guidance. The required load reductions for each campus are depicted in Tables 5 and 6. Since both regulated campuses are in the James River Basin, reductions are not campus-specific and therefore summed in Table 7. The information in the tables addresses the following special condition to provide:

- ✓ *“A determination of the total pollutant load reductions necessary to reduce the annual POC loads from existing sources utilizing the applicable versions of Tables ... based on the river basin to which the MS4 discharges. This shall be calculated by multiplying the total existing acres served by the MS4 by the first permit cycle required reduction in loading rate. For the purposes of this determination, the operator shall utilize those existing acres identified by the 2000 U.S. Census Bureau urbanized area and served by the MS4.” [Section I(C)(2)(a)(5)]*

**Table 5: Estimated 5% POC Reductions Required for the Chester Campus**

Pollutant	Regulated Urban Land Cover	Existing Acres Served by MS4 (06/30/09)	Reduction in Loading Rate (lbs/acre)	Reduction Required First Permit Cycle (lbs)	Total Reduction (lbs)
Nitrogen	Impervious	19.1	0.042255	0.81	1.14
	Pervious	16.1	0.02097	0.35	
Phosphorus	Impervious	19.1	0.01408	0.27	0.30
	Pervious	16.1	0.0018125	0.03	
TSS	Impervious	19.1	6.7694	129.30	136.42
	Pervious	16.1	0.442225	7.43	

**Table 6: Estimated 5% POC Reductions Required for the Midlothian Campus**

Pollutant	Regulated Urban Land Cover	Existing Acres Served by MS4 (06/30/09)	Reduction in Loading Rate (lbs/acre)	Reduction Required First Permit Cycle (lbs)	Total Reduction (lbs)
Nitrogen	Impervious	15.8	0.042255	0.67	1.58
	Pervious	43.6	0.02097	0.91	
Phosphorus	Impervious	15.8	0.01408	0.22	0.30
	Pervious	43.6	0.0018125	0.08	
TSS	Impervious	15.8	6.7694	106.96	126.24
	Pervious	43.6	0.442225	19.28	

**Table 7: Compiled 5% POC Reductions Required for JTCC Regulated Campuses**

Pollutant	Chester Reduction (lbs)	Midlothian Reduction (lbs)	5% Reduction Required (lbs)
Nitrogen	1.14	1.58	2.73
Phosphorus	0.30	0.30	0.60
TSS	136.42	126.24	262.65

### 3.5 Required 35% Load Reductions

The 2013 – 2018 MS4 General Permit required JTCC to reduce 35.0% of the L2 Scoping Run POC reductions for existing sources as of June 30, 2009. The required load reductions for the JTCC campus for this permit cycle were calculated using the calculation sheet in the MS4 General Permit for determining POC reductions for the James River basin. The calculation sheet was modified with the corrected loading rates provided in DEQ’s Guidance Memo No. 15-2005. The required load reductions for JTCC are depicted in Table 8. The information in the table addresses the following special condition to provide:

- ✓ *“The existing pollutant of concern loads by an additional seven times the required reductions in loading rates using the applicable Table 3 for sources included in the 2000 U.S. Census Bureau urbanized areas.” [Section I(C)(2)(b)(1)]*

**Table 8: Estimated 35% POC Reductions Required for JTCC Regulated Campuses**

Pollutant	Regulated Urban Land Cover	Existing Acres Served by MS4 (06/30/09)	Reduction in Loading Rate (lbs/acre)	35% Reduction Required (lbs)
Nitrogen	Impervious	34.9	0.042255	19.09
	Pervious	59.7	0.02097	
Phosphorus	Impervious	34.9	0.01408	4.20
	Pervious	59.7	0.0018125	
TSS	Impervious	34.9	6.7694	1,838.57
	Pervious	59.7	0.442225	

The following information addresses the following special conditions:

- No expanded sources identified in the 2010 census urbanized area. [Section I(C)(5)(b)(2)]
- No additional 35% reduction for new sources developed between 2009 and 2014 and for which the land use cover condition was greater than 16%. [Section I(C)(5)(b)(3)]
- No modifications to the applicable loading rate provided to the operator as a result of TMDL modification. [Section I(C)(5)(b)(4)].

### 3.6 Required 40% Overall Load Reductions

The required 40% load reductions for JTCC are depicted in Table 9:

**Table 9: Estimated 40% POC Reductions Required for JTCC Regulated Campuses**

Pollutant	Regulated Urban Land Cover	Existing Acres Served by MS4 (06/30/09)	Reduction in Loading Rate (lbs/acre)	40% Reduction Required (lbs)
Nitrogen	Impervious	34.9	0.042255	21.81
	Pervious	59.7	0.02097	
Phosphorus	Impervious	34.9	0.01408	4.80
	Pervious	59.7	0.0018125	
TSS	Impervious	34.9	6.7694	2,101.22
	Pervious	59.7	0.442225	



#### **4.0 MEANS TO ACHIEVE 5% POLLUTANT REDUCTIONS**

DEQ's Guidance was used to identify appropriate means and methods for achieving the required reductions computed in Sections 3.4. A review of JTCC's existing stormwater management facilities determined that the required reductions are achieved for the current MS4 General Permit cycle as described in the following sub-sections, addressing the following MS4 General Permit special condition:

- ✓ *"Implementation of means and methods sufficient to meet the required reductions of POC loads from existing sources in accordance with the Chesapeake Bay TMDL Action Plan." [Section I(C)(3)(d)]*

Reduction credits described in this section demonstrate compliance with the reduction requirements for this 2013 - 2018 MS4 General Permit cycle with the understanding that any changes in established BMP efficiencies will not be retroactively applied to projects approved to meet reductions for the MS4 General Permit cycle.

#### **4.1 5% Reductions Achieved with Existing BMPs**

Consistent with the DEQ Guidance, certain credits from historic water quality BMPs can be credited towards pollutant load reductions requirements. Specifically, permittees can receive full credit from BMPs that were:

- Initially installed on or after January 1, 2006 and prior to July 1, 2009, and constructed to address water quality within the permittee's regulated service area; and
- Initially installed after June 30, 2009 provided that credit is only taken for reductions achieved in excess of the reductions required by the SWM regulations water quality criteria for the development.

A review of JTCC's BMPs did not identify water quality BMPs installed on or after January 1, 2006 and prior to July 1, 2009; but did identify two facilities that provide POC reductions in excess of those necessary for the associated developments:

- In October 2009, a retention II basin, as described in the Virginia Stormwater Management Handbook, was installed on the Midlothian campus as part of a stormwater master plan completed by Burgess and Niple entitled, "John Tyler Community College Midlothian Campus Stormwater Master Plan." Consistent with the stormwater regulations water quality criteria at the time, the retention II basin was designed to provide to achieve water quality criteria for the existing and future build-out of the JTCC Midlothian campus. Per the stormwater master plan, the existing retention II basin is designed to provide an additional pollutant removal of 1.5 pounds of phosphorus after future build-out of the Midlothian campus is complete.

To ensure that credit is taken based only on existing development actually treated by the BMP, calculations were completed to determine what portion of the additional 1.50 pounds of phosphorus may be applied to current reduction requirements. As described in Appendix B, based on a ratio of existing impervious area to ultimate impervious area (after all phases of the future build-out are completed), it was calculated that 1.32 of the 1.50 pounds remaining in the pond may be applied to meet reduction requirements. The remaining 0.18 pounds (1.50 - 1.32) of phosphorus will become applicable as future campus development occurs. Calculations to determine the proportional nitrogen and sediment credits available in the regional pond that may be applied towards the required reductions are included in Appendix B and relevant BMP design plan sheets are included in Appendix C. Required and provided nutrient reductions are summarized in Table 10.

**Table 10: Summary of POC Reductions from the Retention II Basin BMP**

Pollutant	Reductions Required by L2 Scoping Run (lbs/yr)	Reductions Provided by Existing BMP (lbs/yr)
Nitrogen	2.73	2.11
Phosphorus	0.60	1.32
TSS	262.65	512.61

- In the spring of 2015, an extended detention basin, as described in the Virginia Stormwater Management Handbook, was installed on the Midlothian campus as part of a plan completed by Timmons Group entitled, “John Tyler Community College Midlothian Campus Phase III.” The approved design plans show that the BMP provides an extra 0.1 pounds of phosphorus removal per year than what is required for its associated development. Calculations to determine the corresponding nitrogen and sediment reductions achieved are included in Appendix B and relevant BMP design plan sheets are included in Appendix C. Required and provided nutrient reductions are summarized in Table 11.

**Table 11: Summary of 5% POC Reductions from the Extended Detention Basin BMP**

Pollutant	Reductions Required by L2 Scoping Run (lbs/yr)	Reductions Provided by Existing BMP (lbs/yr)
Nitrogen	2.73	0.30
Phosphorus	0.60	0.10
TSS	262.65	71.97

The required reductions and those provided by the two existing basins are summarized in Table 12. It is noted from the Table that although the required reductions for phosphorus and TSS are achieved with the two existing BMPs, the full nitrogen reduction requirement is not achieved.

**Table 12: Summary of 5% POC Reductions from Existing BMPs to Achieve Required Reductions**

Pollutant	Reductions Required by L2 Scoping Run (lbs/yr)	Reductions Provided by 2009 Retention II Basin (lbs/yr)	Reductions Provided by 2015 Extended Detention Basin (lbs/yr)	Total Reductions Provided by Existing BMPs (lbs/yr)	Remaining Reductions Required by L2 Scoping Run (lbs/yr)
Nitrogen	2.73	2.11	0.30	2.41	0.32
Phosphorus	0.60	1.32	0.10	1.42	-
TSS	262.65	512.61	71.97	584.58	-

#### 4.2 5% Reductions Achieved with New BMPs

The applicable credit remaining in the existing BMPs did not fully satisfy the required nitrogen reductions. A new BMP was implemented to meet the remaining nitrogen reduction requirement. JTCC implemented street sweeping to supplement the existing BMPs to fully satisfy the required POC reductions identified in Section 3.4. The “mass loading approach,” as described in DEQ’s Guidance was utilized to determine the extent of street sweeping efforts to be implemented. Per the mass loading approach, the overall weight of material collected through street sweeping is multiplied by a dry weight factor and then a factor specific to each POC in order to quantify the pollutant reduction achieved. Given the target nitrogen reduction and the dry weight and POC factors, it was determined that JTCC must collect a minimum of **183** pounds of material per year to achieve the remainder of the required nitrogen reductions. Required reductions and sweeping efforts are summarized in Table 13.

**Table 13: Required Street Sweeping Material to be Collected for 5% POC Reduction**

Pollutant	Remaining Reductions Required by L2 Scoping Run (lbs/yr)	Dry Weight Factor	POC Multiplication Factor	Required Street Sweeping Material Weight (lbs/yr)
Nitrogen	0.32	0.7	.0025	182.86
Phosphorus	0.00*	0.7	.001	-
TSS	0.00*	0.7	0.3	-

\* Note that an additional 0.13 lbs/yr of phosphorus and 39.61 lbs/yr of TSS are removed with the collection of the 177 lbs/yr of material to achieve the nitrogen reduction target.

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JTCC documented sweeping approximately 5,731 lbs. of material during the 2017 – 2018 permit year which exceeded the required 177 lbs. This section addresses the following MS4 General Permit condition:

- ✓ *“Documentation that sufficient control measures have been implemented to meet the compliance target identified in this special condition. If temporary credits or offsets have been purchased in order to meet the compliance target, the list of temporary reductions utilized to meet the required reduction in this state permit and a schedule of implementation to ensure the permanent reduction must be provided.” [Section 1.C.5.a]*

## **5.0 IMPLEMENTATION OF 5% POC REDUCTION TO THE MEP**

Implementation of the Action Plan is dependent on continued execution of the JTCC MS4 Program Plan. MS4 Program Plan BMPs will continue to be implemented per the schedules outlined in the JTCC MS4 Program Plan to address the following special condition:

- ✓ *“The means and methods, such as management practices and retrofit programs that will be utilized to meet the required reductions included in subdivision 2 a (5) of this subsection ... and a schedule to achieve those reductions. The schedule should include annual benchmarks to demonstrate the ongoing progress in meeting those reductions.”* [Section I(C)(2)(a)(6)]

The cost associated with the implementation of street sweeping is estimated to be approximately \$1,390 per year per pound of nitrogen reduction. This estimate is based on the document titled “Cost-Effectiveness Study of Urban Stormwater BMPs in the James River Basin” by the Center for Watershed Protection. The study detailed costs associated with street sweeping based on a ten-year life cycle and capital costs of the equipment.

During the 2013 - 2018 permit cycle, JTCC evaluated the most cost-effective way for implementing a street sweeping program which included contracting a street sweeping company. JTCC’s actual costs for the 2013 – 2018 permit cycle were \$5,950. This statement addresses the following special condition:

- ✓ *“An estimate of the expected costs to implement the requirements of this special condition during the state permit cycle.”* [Section I(C)(2)(a)(11)]

### **5.1 Implementation Actions for 5% POC Reductions**

JTCC developed a street sweeping program. Street sweeping efforts included the following Action Steps:

1. Begin street sweeper contractor identification and begin sweeping to determine the scale of street sweeping needed to meet the target reductions. These preliminary sweepings are not intended to meet any regulatory requirement.
2. Based on the results from Step 1, develop documentation for tracking areas swept, type of sweeper used, man hours, and other information determined as relevant for characterization of collected materials.
3. Develop and conduct annual training for staff performing street-sweeping.
4. Conduct sampling of collected street sweeping materials to correlate dry weight and sediment fraction to verify computational methods for determining POC reductions from collected street sweeping material. Alternative computational methods may result from a study of the sampled materials. Sampling and analysis will be based on technically defensible analytical methods.

5. Conduct an assessment to identify target areas based on areas swept that produce the largest yield of sediment collected per acre. The assessment will consider time span between sweeping and weather conditions at the time of sweeping.
6. Assessment of College’s current street sweeping to determine their sediment and nutrient removal efficiencies and cost effectiveness.

The Action Steps identified are intended to serve as a defined method that inherently serves as an adaptive iterative approach.

### 5.2 Implementation Schedule for 5% POC Reductions

The College began implementing Step 1 of the implementation strategy described in Section 5.1 during the 2015-2016 MS4 General Permit reporting year. Implementation was be documented and improved with the implementation of the remaining steps with the schedule and measurable goals described in Table 14. The Implementation Actions described in Section 5.1 and the Implementation Schedule in Table 14 address the following special conditions:

- ✓ *“The means and methods, such as management practices and retrofit programs that will be utilized to meet the required reductions included in subdivision 2 a (5) of this subsection ... and a schedule to achieve those reductions. The schedule should include annual benchmarks to demonstrate the ongoing progress in meeting those reductions.”* [Section I(C)(2)(a)(6)]

**Table 14: Street Sweeping Program Schedule for 5% POC Reductions.**

Step	General Description	Measurable Goal	Completion Date
1	Improve tracking and information on areas swept	Written report and supporting materials for tracking documentation; completed tracking documentation beginning after completion date	July 2016
2	Begin annual training for staff identified in the Written Program	Training materials and documentation of training implementation	July 2016
3	Conduct collected material sampling and analysis	Written report incorporating a summary of relevant sampling data and analysis for computing POC fraction(s)	Oct. 2016
4	Target area identification and sediment reduction assessment	Written reporting building on field collected data from Steps 1 and 3 to target areas for sweeping to maximize POC reduction	July 2017
5	Sweeper evaluation	Written report assessing the effectiveness and appropriateness of the contractor’s sweepers.	Jan. 2018
6	Implementation of targeted areas for sweeping	Implementation of the identified target areas resulting from Step 4.	Annually, begin July 2018

### 5.3 Supplemental Means and Methods for 5% POC Reductions

In addition, the remaining Minimum Control Measure BMPs described in Section 2.1 continued to be implemented by JTCC as part of the JTCC MS4 Program Plan. Continued implementation of these BMPs demonstrates implementation of the JTCC Chesapeake Bay Action Plan to the maximum extent practicable and demonstrates adequate progress satisfying the following special conditions:

- ✓ *“Implementation of nutrient management plans ...”* [Section I(C)(3)(a)]
- ✓ *“Implementation of the minimum control measure ... related to construction site stormwater runoff control in accordance with this state permit shall address discharges from transitional sources.”* [Section I(C)(3)(b)]

### 5.4 Public Comment Period for 5% POC Reductions

JTCC solicited public comment on the Plan and considered all comments that are provided. Public comment was provided through the following means:

- A draft of the Chesapeake Bay TMDL Action plan was posted on JTCC’s website for a minimum of 14 total days.
- An email was sent to the target audience audiences identified in Minimum Control Measure 1 of the JTCC MS4 Program Plan with a link where the public may comment on the Action Plan.

The JTCC Chesapeake Bay TMDL Action Plan was posted for public comment from 9/28/2015 – 10/19/2015. One comment was received that was complimentary of the JTCC Chesapeake Bay TMDL Action Plan. Therefore, no additional considerations or responses were needed.

Solicitation of public comment on the Action Plan addresses the following special condition:

- ✓ *“An opportunity for receipt and consideration of public comment regarding the draft Chesapeake Bay TMDL Action Plan.”* [Section I(C)(2)(a)(12)]

### 5.5 Annual Reporting for 5% POC Reductions

The effectiveness of the Action Plan was be measured through the MS4 General Permit annual reporting requirement. JTCC reported annually on the implementation on the BMPs described in Section 4.1 of this Plan.

## 6.0 MEANS TO ACHIEVE 40% OVERALL POC REDUCTIONS

DEQ’s Guidance Memo No. 15-2005 was used to identify appropriate means and methods for achieving the required reductions computed in Section 3.6. The means and methods are described in the following sub-sections and will be incorporated into the JTCC MS4 Program Plan for implementation, addressing the following MS4 General Permit special condition:

- ✓ *“Implementation of means and methods sufficient to meet the required reductions of POC loads from existing sources in accordance with the Chesapeake Bay TMDL Action Plan.” [Section I(C)(3)(d)]*

POC load reductions described in the following sub-sections demonstrate compliance with the reduction requirements for the 2018 - 2023 MS4 General Permit cycle with the understanding that any changes in established BMP efficiencies will not be retroactively applied to projects approved to meet reductions for this MS4 General Permit cycle.

### 6.1 40% Overall POC Reductions to be Achieved with Street Sweeping

JTCC will implement street sweeping in order to satisfy the required POC reductions identified in Section 3.6. The “mass loading approach,” as described in DEQ’s Guidance Memo No. 15-2005, was utilized to determine the extent of street sweeping efforts to be implemented. Per the mass loading approach, the overall weight of material collected through street sweeping is multiplied by a dry weight factor and then a factor specific to each POC in order to quantify the pollutant reductions achieved. Given the target pollutant reductions and the dry weight and POC factors, it was determined that JTCC must collect a minimum of **12,465** pounds of material per year to meet the POC reduction requirements. Required reductions and sweeping efforts are summarized in Table 15.

**Table 15: Required Street Sweeping Material to be Collected for 40% POC Reduction**

Pollutant of Concern (POC)	40% Annual Reductions Required of L2 (lbs/yr)	Existing BMP Reduction Credit (Section 6.1)	Revised 40% Annual Reductions Required (lbs/yr)	Dry Weight Factor	POC Multiplication Factor	Required Street Sweeping Material Weight (lbs/yr)
Nitrogen	21.81	2.41	19.39	0.7	.0025	12,464.5
Phosphorus	4.80	1.42	3.38	0.7	.001	6,852.55
TSS	2,101.22	584.58	1,516.64	0.7	0.3	7,222.10



## **7.0 IMPLEMENTATION OF 40% POC REDUCTIONS TO THE MEP**

Implementation of the 2018 – 2023 Action Plan is dependent on continued execution of the JTCC MS4 Program Plan. MS4 Program Plan BMPs will continue to be implemented per the schedules outlined in the JTCC MS4 Program Plan to address the following special condition:

- ✓ *“The means and methods, such as management practices and retrofit programs that will be utilized to meet the required reductions included in subdivision 2 a (5) of this subsection ... and a schedule to achieve those reductions. The schedule should include annual benchmarks to demonstrate the ongoing progress in meeting those reductions.”* [Section I(C)(2)(a)(6)]

JTCC plans to continue to contract street sweeping services. JTCC estimates the cost for street sweeping to be approximate total of \$36,500 to meet the required POC reductions for the 2018 – 2023 permit cycle. This information addresses the following special condition:

- ✓ *“An estimate of the expected costs to implement the requirements of this special condition during the state permit cycle.”* [Section I(C)(2)(a)(11)]

### **7.1 Implementation Schedule for 40% POC Reductions**

JTCC will begin implementing Step 1 of the implementation strategy described in this Section during the 2018-2023 MS4 General Permit reporting year. Implementation will be documented and improved with the implementation of the remaining steps with the schedule and measurable goals described in Table 16. The Implementation Actions described in Section 7.0 and the Implementation Schedule in Table 16 address the following special conditions:

- ✓ *“The means and methods, such as management practices and retrofit programs that will be utilized to meet the required reductions included in subdivision 2 a (5) of this subsection ... and a schedule to achieve those reductions. The schedule should include annual benchmarks to demonstrate the ongoing progress in meeting those reductions.”* [Section I(C)(2)(a)(6)]

**Table 16: Schedule for 40% Overall POC Reductions from the Street Sweeping Program**

Step	General Description	Measurable Goal	Completion Date
1	Complete 5% reduction requirement. Evaluate lbs. swept.	Completed tracking documentation.	July 2019
2	Complete 5% reduction requirement. Evaluate lbs. swept. Make adjustments to frequency based on 2019 information obtained.	Completed tracking documentation with increase sweeping frequency.	July 2020
3	Complete 5% reduction requirement. Evaluate lbs. swept. Determine if 40% can be achieved w/ street sweeping alone. If not, evaluate alternate means to achieve 40% reduction. Secure funding for future implementation of new BMPs. Revise Action Plan accordingly.	Completed tracking documentation. If required, revise Action Plan.	July 2021
4	Complete 5% reduction requirement. Evaluate lbs. swept. Ensure means and methods are in place to meet 40% reduction including additional BMPs if necessary.	Completed tracking documentation and support documentation from any new BMPs employed to meet 40% reduction.	July 2022
5	Complete 40% reduction requirement with selected means and methods.	Completed tracking documentation and support documentation from any new BMPs employed to meet 40% reduction.	July 2023
6	Report on Chesapeake Bay TMDL 40% reduction achievement.	Record results in Annual Report.	October 2023

## 7.2 Supplemental Means and Methods for 40% POC Reductions

In addition, the remaining Minimum Control Measure BMPs described in Section 2.1 will continue to be implemented by JTCC as part of the JTCC MS4 Program Plan. Continued implementation of these BMPs demonstrates implementation of the JTCC Chesapeake Bay Action Plan to the maximum extent practicable and demonstrates adequate progress satisfying the following special conditions:

- ✓ *“Implementation of nutrient management plans ...”* [Section I(C)(3)(a)]
- ✓ *“Implementation of the minimum control measure related to construction site stormwater runoff control in accordance with this state permit shall address discharges from transitional sources.”* [Section I(C)(3)(b)]

### **7.3 Public Comment Period for 40% POC Reductions**

JTCC will solicit public comment on this Plan and consider all comments that are provided. Public comment will be provided through the following means:

- A draft of the Chesapeake Bay TMDL Action plan will be posted on JTCC's website for a minimum of 15 total days.
- An email will be sent to the target audience identified in Minimum Control Measure 1 of the JTCC MS4 Program Plan with a link where comment can be provided on the Action Plan.

Solicitation of public comment on the Action Plan addresses the following special condition:

- ✓ *"An opportunity for receipt and consideration of public comment regarding the draft Chesapeake Bay TMDL Action Plan."* [Section I(C)(2)(a)(12)]

### **7.4 Annual Reporting for 40% POC Reductions**

The effectiveness of the Action Plan will be measured through the MS4 General Permit annual reporting. JTCC will report annually on the implementation of the means and methods described in Section 4.1 of this Plan.

**Appendix A: Mapping for Characterization of JTCC Campuses**

**Appendix B: Supporting POC Reduction Calculations**

**Appendix C: Supporting BMP Design Plans**