

Updated MS4 Program Plan November 1, 2018 - June 30, 2023

BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	PY 4 Status
	Program Plan Requirements						
	Roles and responsibilities	Identify the roles and responsibilities for each department, division, and subdivision in implementing the permit, also include the written agreement for any other entities implementing parts of the Program Plan	List of roles and responsibilities, written agreement	SW Program Administrator	As needed	List of roles and responsibilities; Written agreement(s)	
1. Public Outreach and Education							
1.1	Update Public Education and Outreach Program						
1.1a	Design a plan to educate citizens on actions they can take to reduce impacts of stormwater pollution on waterways with an emphasis on impaired waters by first identifying at least 3 high-priority water quality issues	Clearly identify at least 3 high priority water quality issues	Issues identified	askHRgreen.org Stormwater Education Subcommittee	PY1	Education and Outreach Plan	Completed PY1
1.1b	Rationale for selecting each of the 3 issues	Explain the importance of each issue	Raitonale identified	askHRgreen.org Stormwater Education Subcommittee	PY1	Education and Outreach Plan	Completed PY1
1.1c	Provide a contact name and phone number where the public can find more information	Provide contact information	Information provided	SW Program Administrator	PY1	Locality website	Completed PY1
1.1d	Increase public's knowledge of hazards associated with illegal discharges and improper disposal of waste, including legal implications	Communicate hazards	Document communications	askHRgreen.org Stormwater Education Subcommittee		Education and Outreach Plan	Ongoing

Updated MS4 Program Plan November 1, 2018 - June 30, 2023

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1.1e	Target individuals or groups most likely to have significant stormwater impacts	Identify the audience for each issue	Audience identified	askHRgreen.org Stormwater Education Subcommittee		Education and Outreach Plan	Ongoing
1.1f	Strategies listed in Table 1 of permit	Identify two or more strategies to address each issue	Strategies identified	askHRgreen.org Stormwater Education Subcommittee		Education and Outreach Plan	Multiple Strategies in use.
1.1g	Schedule for communicating messaging	Document the anticipated time periods the messages will be communicated or made available to the public	Time periods documented	askHRgreen.org Stormwater Education Subcommittee		Education and Outreach Plan	Ongoing
1.2	Regional Media Campaign to Address High Priority Issues						Participated in the regional askHRgreen.org program according to the Regional budget (see attached).
1.2a	<i>Scoop the Poop</i> campaign	Make <i>Scoop the Poop</i> information and giveaways available where citizens receive animal licenses and at pet-related events as appropriate	Target audience reached through activities.	askHRgreen.org Stormwater Education Subcommittee		askHRgreen.org Annual Report:	Ongoing
1.2b	Promote Lawn Care campaign	Run media campaigns and make lawn care best management practice guides available.	Target audience reached through activities.	askHRgreen.org Stormwater Education Subcommittee		askHRgreen.org Annual Report	Ongoing

Updated MS4 Program Plan November 1, 2018 - June 30, 2023

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1.2c	Promote FOG campaign	Participate in the askHRgreen.org regional media campaign via print, television (local municipal access, cable and local affiliate), radio, and social media	Target audience reached through activities.	askHRgreen.org Stormwater Education Subcommittee		askHRgreen.org Annual Report	Ongoing
1.2d	Promote Stormwater Pollution Prevention to Businesses	Participate in the askHRgreen.org regional Bay Star Businesses Program	Target audience reached through activities.	askHRgreen.org Stormwater Education Subcommittee		askHRgreen.org Annual Report	Ongoing
1.3	Provide for Public Participation						
1.3a	Local Outreach	Post volunteer opportunities on local website.	Number and types of events	askHRgreen.org Representative	Annually	Locality website	Ongoing
1.3b	Regional Initiatives	Submit articles for askHRgreen.org blog for public participation in water quality improvement initiatives.	Number and types of events submitted	askHRgreen.org Representative	Annually	askHRgreen.org website	If you need a summary of what you provided to the website, please contact Katie.
1.3c	Regional Outreach	Post volunteer opportunities on askHRgreen.org calendar	Number and types of events submitted	askHRgreen.org Representative & HRPDC Environmental Educator	Quarterly	askHRgreen.org website	If you need a summary of what you provided to the website, please contact Katie.
1.3d	Distribute educational materials developed through askHRgreen.org	Distribute materials developed through askHRgreen.org to target audience in locality.	Number of materials distributed	askHRgreen.org Representative	Continuously		Localities should attach a list of the giveaways they distributed. HRPDC staff will send out a list of promotional items distributed by locality.

Updated MS4 Program Plan November 1, 2018 - June 30, 2023

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1.3e	Maintain and enhance askHRgreen.org website	Increase website visits each year	Annual askHRgreen.org website visits	HRPDC & askHRgreen.org	Permit Cycle	askHRgreen.org Annual Report	Visits to askHRgreen.org have increased every year since 2012
1.4	Participate in regional committees: askHRgreen.org and Regional Stormwater Workgroup		Maintain valid MOA	HRPDC	Every 5 years (concurrent with MS4 permit cycle).	MOA	MOA was renewed in 2018.
1.4a	Regional Cooperation	Participate in the regional processes, including the Regional Stormwater Workgroup and askHRgreen.org	Number of meetings attended/Number of meetings held	SW Program Administrator	Annually	Attendance chart	HRPDC staff will provide
1.4b	askHRgreen.org	Participate in at least 50% of askHRgreen.org Stormwater Education Subcommittee meetings	Number of meetings attended/Number of meetings held	SW Program Administrator	Annually	Attendance chart	HRPDC staff will provide
1.5	Evaluation and Assessment	Evaluate and assess progress towards meeting measurable goals.		SW Program Administrator	Annually	Annual report	

Updated MS4 Program Plan

2. Public Involvement/Participation							
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	PY 4 Status
2.1	Public Involvement						
2.1a	Develop and implement procedures for public to report illicit discharges, spills, and other environmental concerns	Implement procedures	Procedures	SW Program Administrator & IT Department	PY1	Annual report	Completed PY1
2.1b	Establish methods to receive, respond to, and document public input on the MS4 program	Establish methods	Methods and documentation	SW Program Administrator & IT Department	PY1	Annual report	Completed PY1
2.1c	Establish a dedicated webpage for the MS4 program that includes: 1) the MS4 permit and coverage letter, 2) Program Plan, 3) annual reports, 4) a way to report illicit discharges, and 5) methods for how the public can provide input on the Program Plan	Establish a dedicated MS4 webpage	Presence of materials on dedicated MS4 webpage	SW Program Administrator & IT Department	Before 2/1/19	Annual report	Completed PY1
2.2	Public Participation						
2.2a	Offer a minimum of four local activities per year from two or more categories in Table 2	Insert local activities and the category for each	Activities offered	SW Program Administrator	Annually	Annual report	Ongoing
2.2b	Identify a metric for each public participation activity	Identify metrics	Examples include the weight of debris collected or number of participants				Ongoing
2.2c	Schedule of public participation activities	Document the anticipated time periods the activities will occur	Time periods documented	SW Program Administrator	Annually	Annual report	Ongoing
2.3	Evaluation and Assessment	Evaluate and assess whether the activities are beneficial to improving water quality.		SW Program Administrator	Annually	Annual report	

Updated MS4 Program Plan November 1, 2018 - June 30, 2023

3. Illicit Discharge Detection and Elimination							
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	PY 4 Status
3.1	Storm Sewer System Map						
3.1a	MS4 service area map using the 2010 CUA	Maintain and update mapping	Updated Map	SW Program Administrator/ IT Dept. (GIS)	Annually	Service area map	Ongoing
3.1b	MS4 outfall or point of discharge information table	Maintain and update table	Updated Table	SW Program Administrator/ IT Dept. (GIS)	Annually	Information Table	Ongoing
3.1c	Provide to DEQ a GIS-compatible shapefile of the MS4 map	Provide file	Provide to DEQ	SW Program Administrator/ IT Dept. (GIS)	No later than 7/1/19	Shapefile	Completed
3.1d	New outfalls or recently approved TMDLs	Update map and table	Updated map and table	SW Program Administrator/ IT Dept. (GIS)	No later than October 1 each year, incorporate updates through June 30	Map and information table	Ongoing
3.1e	Provide written notification to downstream MS4s	Identify and notify, in writing, any downstream adjacent MS4 of any known physical interconnection established or discovered after permit effective date.	Develop map, Regional Stormwater Workgroup Meetings, letters	SW Program Administrator	Annually	Letters; meeting attendance	Completed

Updated MS4 Program Plan November 1, 2018 - June 30, 2023

3. Illicit Discharge Detection and Elimination							
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	PY 4 Status
3.1f	Prohibit illicit discharges through ordinance	Continue implementing and enforcing the illicit discharge/stormwater ordinance.	Current Ordinance	SW Program Administrator/ Fire Dept	As necessary	Ordinance	Completed
3.2	Dry Weather Screening (DWS)						
3.2a	Maintain and implement dry weather screening protocol	Implement written dry weather field screening methodologies for IDDE. Track the outfall unique identifier, time since last precipitation event, estimated quantity of the last precipitation event, site description, whether a discharge was observed and if so, rate of discharge, and visual characteristics	Protocol	SW Program Administrator/ SW Inspector	Continuously	DWS Protocol	Ongoing
3.2b	Develop a prioritized schedule for field screening and the rationale for the prioritization	Implement the schedule and document the rationale	Schedule	SW Program Administrator/ SW Inspector	Annually	DWS Protocol	Ongoing
3.2c	Field testing & outfall reconnaissance inventory (ORI)	Perform dry weather screening of a minimum of 50 outfalls (or all if < 50 outfalls in MS4)	Documentation of screening performed and results	SW Program Administrator/ SW Inspector	Annually	Map and ORI Field sheets	Ongoing

Updated MS4 Program Plan November 1, 2018 - June 30, 2023

3. Illicit Discharge Detection and Elimination							
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	PY 4 Status
3.3	IDDE program implementation						
3.3a	Maintain and implement written procedures for IDDE	Implement written IDDE procedures	Procedures	SW Program Administrator	Continuously	Procedures	Ongoing
3.3b	Public IDDE Reporting	Promote & publicize IDDE reporting	Presence of contact information on website	SW Program Administrator	Continuously	Locality website	See Website
3.3c	Prevent or minimize the discharge of hazardous substances and oil in the MS4 stormwater discharge.	Yard inspections; Develop/enhance reporting relationship with FD/Haz Mat Team; targeted education	Number of responses/ number of inspections	SW Program Administrator/ Fire Dept	Continuously	Inspection forms	Ongoing
3.3d	IDDE activity tracking	Track illicit discharge detection and elimination activities.	Number of investigations and actions taken	SW Program Administrator/ Fire Dept	Ongoing	List of Activities	Ongoing
3.3e	Continue Sanitary Sewer System improvements in coordination with SSO consent order	Continue to diagnose and correct deficiencies	Number of improvements	SW Program Administrator/ Public Utilities	Continuously	List of Improvements	Ongoing
3.4	Spill reporting						
3.4a	Report non sewer spills and releases from small MS4 operated properties that reach State waters to DEQ.	Report spills to the DEQ's Pollution Response Program (PREP), if applicable	Number of internal reports. If applicable, obtain PREP number.	SW Program Administrator/ Fire Dept	Continuously	Internal Summary Report	Ongoing

Updated MS4 Program Plan November 1, 2018 - June 30, 2023

3. Illicit Discharge Detection and Elimination							
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	PY 4 Status
3.4b	Report Sanitary Sewer Overflows through SSORS database.	Continue to utilize SSORS to report Sanitary Sewer Overflows	Number of overflows	Public Utilities Superintendent.	Continuously	List from SSORS	Ongoing
3.5	Evaluation and Assessment	Evaluate and assess progress towards meeting measurable goals.		SW Program Administrator/ Fire Dept	Annually	Annual report	

Updated MS4 Program Plan November 1, 2018 - June 30, 2023

4. Construction Site Storm Water Runoff Control							
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	PY 4 Status
4.1	Legal Authorities						
4.1a	Construction projects	Continue to implement the SWM, E&SC, & CBPA ordinances	SWM, E&SC, & CBPA Ordinance citations	SW, E&SC, & CBPA Program Administrators	Continuously	Ordinances	ongoing
4.2	Compliance and Enforcement						
4.2a	Written E&SC inspection procedures	Implement inspection procedures	Procedures	E&SC Program Administrator	Continuously	Procedures	ongoing
4.2b	Written E&SC procedures for requiring compliance through corrective action or enforcement action	Implement corrective or enforcement action procedures	Procedures	E&SC Program Administrator	Continuously	Procedures	ongoing
4.2c	Roles and responsibilities of each department, division, or subdivision in implementing the construction site SW runoff control program	Documentation	Presence of documentation	E&SC Program Administrator	Continuously	Annual Report	ongoing
4.2d	E&SC inspections	Continue to implement construction site BMP, and inspection provisions of the local Erosion and Sediment Control Ordinance.	# of inspections	E&SC Program Administrator	Annually	Summary from Locality tracking system	ongoing
4.2e	E&SC enforcement actions	Continue to implement enforcement provisions per local Erosion and Sediment Control Ordinance	# enforcement actions	E&SC Program Administrator	Annually	Summary from Locality tracking system	ongoing

Updated MS4 Program Plan November 1, 2018 - June 30, 2023

4. Construction Site Storm Water Runoff Control							
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	PY 4 Status
4.7	Evaluation and Assessment	Evaluate and assess progress towards meeting measurable goals.		SW Program/E&SC Program Administrators	Annually	Annual Report	

5. Post Construction Storm Water Management in New Development and Redevelopment							
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	PY 4 Status
5.1	Post Construction SW Management Program						
5.1a	Local VSMP	Implement the approved VSMP	Approved VSMP	VSMP Authority Administrator	Ongoing	Approval letter issued by DEQ	
5.1b	Stormwater Management Ordinance	Implement the stormwater criteria of the Stormwater Management Ordinance for new development and redevelopment	Stormwater Management Ordinance	SW Program Administrator	Ongoing	SWM Ordinance	
5.2	Inspection & Maintenance Schedules for BMPs						
5.2a	Written inspection and maintenance procedures for managing locally owned BMPs	Implement procedures, inspect locally owned BMPs at least annually (or have an approved alternative schedule)	# of inspections; description of significant maintenance activities	SW Program Administrator	Ongoing	Procedures and BMP Spreadsheet /Database	
5.2b	Inspection and enforcement program for privately-owned BMPs	Implement program, inspect privately owned BMPs at least once every 5 years	# of inspections; # of enforcement activities	SW Program Administrator	Ongoing	BMP Spreadsheet /Database	
5.2c	BMP Maintenance Agreements	Require BMP maintenance agreements as directed by the Stormwater Management Ordinance.	# of Agreements & Inspection Schedules	SW Program Administrator	Ongoing	List of Maintenance Agreements	
5.2d	Optional - Develop and implement a progressive compliance and enforcement strategy	Develop and implement strategy	Strategy	SW Program Administrator	Ongoing	Written Strategy	
5.3	Tracking and Reporting						
5.3a	BMP Tracking	Track all known permanent stormwater management facilities that discharge to the regulated small MS4 and submit the information listed in permit	Data as required by Permit (print & spreadsheet/ database)	SW Program Administrator	Annually	BMP Spreadsheet /Database	
5.3b	Update database or spreadsheet with new BMPs	Track new permanent stormwater management facilities	Database or spreadsheet with new BMP information	SW Program Administrator	Within 30 days of date brought online	BMP Spreadsheet /Database	
5.3c	Report Construction BMPs	Report BMPs installed to control post-construction runoff through the DEQ Construction SW database	Confirmation statement	SW Program Administrator	Ongoing	Confirmation statement	

Updated MS4 Program Plan November 1, 2018 - June 30, 2023

6. Pollution Prevention/Good Housekeeping for Facilities Owned or Operated by the Permittee								
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	PY 4 Status	
6.1	Operations and Maintenance Activities							
6.1a	Pollution prevention procedures at permittee-owned facilities	Continue to implement and update plans describing spill prevention and control and pollution prevention procedures for municipal facilities specifically to prevent illicit discharges	SOP(s)/ O&M Plan	SW Program Administrator/ EMS Team	Continuously	SOPs/ O&M Plan	ongoing	
6.1b	Waste Disposal	Continue to implement and update procedures for proper waste disposal, including yard waste	SOP(s)/ O&M Plan	SW Program Administrator/ EMS Team	Continuously	SOPs/ O&M Plan	ongoing	
6.1c	Manage Municipal Vehicle Wash Water and Wastewater	Develop and implement procedures to prevent the discharge of municipal vehicle wash water into the MS4 without a separate VPDES permit	Procedures	Operations Personnel and Department of Utilities	Continuously	SOPs/ O&M Plan	ongoing	
6.1e	Stormwater System Maintenance BMPs	Require BMPs when discharging water pumped from utility construction and maintenance activities	BMPs Used	Operations Personnel	Continuously	SOPs/ O&M Plan	ongoing	
6.1f	Bulk Storage BMPs	Require BMPs for bulk storage areas (salt storage, top soil stockpiles)	BMPs Used	Operations Personnel	Continuously	SOPs/ O&M Plan	ongoing	

Updated MS4 Program Plan November 1, 2018 - June 30, 2023

6. Pollution Prevention/Good Housekeeping for Facilities Owned or Operated by the Permittee							
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	PY 4 Status
6.1g	Manage Leaking Municipally-owned Leaking Vehicles	Prevent the discharge of pollutants to the MS4	BMPs Used	Operations Personnel	Continuously	SOPs/ O&M Plan	ongoing
6.1h	Manage Fertilizers and Pesticides	Implement procedures to ensure materials are applied in accordance with manufacturer's recommendations	Procedures	Operations Personnel	Continuously	SOPs/ O&M Plan	Approved DCR Nutrient Management Plan
6.2	Storm Water Pollution Prevention Plans (SWPPP)						
6.2a	High-priority facilities	Identify municipal high-priority facilities that have a high potential to discharge stormwater pollutants	# & type of high-priority facilities	SW Program Administrator	Within 12 months	List of high-priority facilities	ongoing
6.2b	SWPPP Implementation	Maintain and implement SWPPPs for identified high-priority facilities	SWPPP	SW Program Administrator	Continuously	SWPPP	ongoing
6.3	Nutrient Management Plans (NMPs)						
6.3a	NMP Implementation	Maintain and implement NMPs on permittee-owned lands where nutrients are applied to a contiguous area greater than one acre	NMP	SW Program Administrator & Landscape Division	Continuously	List of NMP Covered Sites	Approved DCR Nutrient Management Plan

Updated MS4 Program Plan November 1, 2018 - June 30, 2023

6. Pollution Prevention/Good Housekeeping for Facilities Owned or Operated by the Permittee							
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	PY 4 Status
6.3b	Avoid deicing agents	Operator shall not apply deicing agents containing urea or other forms of nitrogen or phosphorus to parking lots, roadways, and sidewalks, or other paved surfaces	Statement of non-use of nutrient containing deicing agents	SW Program Administrator	Annually	Statement	Urea Deicing not used
6.4	Contractors						
	Contractors minimize the discharge of pollutants	Provide contract language, training, SOPs, etc. to contractors to use appropriate control measures to minimize the discharge of pollutants to the MS4	Contract language, SOPs, etc.	SW Program Administrator	Continuously	Contract language, SOPs, etc.	ongoing
6.5	Employee Education & Training						
6.5a	Written training plan	Maintain and implement a training plan for applicable staff	Training Plan	SW Program Administrator	PY1	Training Plan	Completed PY1
6.5b	IDDE Training for field personnel	Provide training to field personnel in the recognition and reporting of illicit discharges	# of training sessions / # employees trained	SW Program Administrator	No less than once every 24 months	Date, Attendance list, Summary of training objectives	Training held 2020, next training scheduled for 2022
6.5c	Streets & parking lot maintenance staff training	Provide training to Streets & Landscape Divisions for road, street & parking lot maintenance	# of training sessions / # employees trained	SW Program Administrator	No less than once every 24 months	Date, Attendance list, Summary of training objectives	Training held 2020, next training scheduled for 2022

Updated MS4 Program Plan Novmeber 1, 2018 - June 30, 2023

6. Pollution Prevention/Good Housekeeping for Facilities Owned or Operated by the Permittee							
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	PY 4 Status
6.5d	Good housekeeping at municipal yards	Provide training on good housekeeping and pollution prevention practices to employees working in and around maintenance, public works, or rec facilities	# of training sessions / # employees trained	SW Program Administrator	No less than once every 24 months	Date, Attendance list, Summary of training objectives	Training held 2020, next training scheduled for 2022
6.5e	Pesticides & herbicide certifications	Maintain certifications and training for pesticide and herbicide applicators in accordance with Virginia Pesticide Control Act and verify contractors have obtained	Certifications obtained	SW Program Administrator	Continuously	Certifications	Certifications kept current.
6.5f	E&SC & SWM Training	Ensure that plan reviewers, inspectors, and program administrators obtain the appropriate certifications as required under the Erosion and Sediment Control Law and the Stormwater Management Act and verify that contractors have obtained	Certifications obtained	E&SC Program and SW Program Administrators	Continuously	Certifications	ongoing
6.5g	Emergency Response employee training	Document spill management training for emergency responders	Certifications obtained	Haz-Mat officer	Annually	Certifications	Fire and Life Safety undergo required training.
6.6	Evaluation and Assessment	Evaluate and assess progress towards meeting measurable goals.		SW Program Administrator	Annually	Annual report	

Updated MS4 Program Plan November 1, 2018 - June 30, 2023

TMDL Special Conditions							
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	PY 4 Status
SC-1	Chesapeake Bay TMDL						
SC-1a	Update the Chesapeake Bay TMDL Action Plan	Update the Bay TMDL Action Plan to meet 40% reduction of pollutants of concern (POC)	Updated Bay TMDL Action Plan	SW Program Administrator	12 months after permit effective date	Updated Bay TMDL Action Plan	Updated Plan Approved.
SC-1b	Provide opportunity for public comment on the updated Bay TMDL Action Plan	Opportunity provided for public comment	Public comment period for no less than 15 days	SW Program Administrator	Prior to submittal of updated Bay TMDL Action Plan	Record of Comments	No comments received.
SC-1c	Implement Bay TMDL Action Plan	Implement the Bay TMDL Action Plan to meet 40% of the Level 2 (L2) reductions of pollutants of concern (POC) by the end of the permit cycle	BMPs implemented	SW Program Administrator	End of PY5	Bay TMDL Action Plan	Ongoing
SC-2	Local TMDL						
SC-2a	Local TMDL Action Plan for TMDLs approved by EPA prior to July 1, 2013	Develop a local TMDL Action Plan	Local TMDL Action Plan	SW Program Administrator	No later than 18 months after permit effective date	Local TMDL Action Plan	NA
SC-2b	Local TMDL Action Plan for TMDLs approved by EPA on or after July 1, 2013 and prior to June 30, 2018	Develop a local TMDL Action Plan	Local TMDL Action Plan	SW Program Administrator	No later than 30 months after the permit effective date	Local TMDL Action Plan	NA
SC-2c	Identify the significant sources of the POC	Identify the significant sources	Sources identified	SW Program Administrator	No later than 18 or 30 months after permit effective date, as applicable	Local TMDL Action Plan	NA

Updated MS4 Program Plan November 1, 2018 - June 30, 2023

SC-2d	Outreach strategy to enhance public (including staff) education on reducing bacteria discharges	Develop and implement an outreach strategy	Outreach Strategy	askHRgreen and SW Program Administrator	No later than 18 or 30 months after permit effective date, as applicable	Local TMDL Action Plan	NA
SC-2e	Schedule of anticipated actions for this permit term	Schedule of anticipated actions provided	Schedule of actions	SW Program Administrator	No later than 18 or 30 months after permit effective date, as applicable	Local TMDL Action Plan	NA
SC-2f	Public comment period for the updated Local TDML Action Plan	Opportunity provided for public comment	Public comment period for no less than 15 days	SW Program Administrator	Prior to submittal of updated Local TMDL Action Plan	Record of Comments	NA
SC-3	Bacteria TMDL						
SC-3a	Implement at least 3 strategies from Table 5	Identify strategies	At least 3 strategies implemented	SW Program Administrator	As listed in schedule of anticipated actions	Bacteria TMDL Action Plan	Plan updated 2020
SC-4	Sediment, Phosphorous, and Nitrogen TMDLs						
SC-4a	Implement BMPs to reduce pollutant loads	BMPs listed in the VA BMP Clearinghouse, BMPs approved by the CBP, or using land disturbance thresholds lower than required	BMPs installed	SW Program Administrator	As listed in schedule of anticipated actions	Sediment, P, or N TMDL Action Plan	NA
SC-4b	Submit anticipated end date by which the WLA will be met	Identify anticipated end date	Submit anticipated end date	SW Program Administrator	36 months after effective date of permit	Annual report	NA

Updated MS4 Program Plan November 1, 2018 - June 30, 2023

SC-5	PCB TMDLs						
	Develop an inventory of potentially significant sources of PCBs owned or operated by the permittee	Develop potentially significant sources inventory	Potentially significant sources identified	SW Program Administrator	As scheduled in permit	PCB TMDL Action Plan	NA