

City of Poquoson Annual Report

VAR# 040024

Permit Year 5 (PY5): July 1, 2017-June 30, 2018

Submitted to DEQ October 1, 2018



CITY OF POQUOSON
ENGINEERING

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September 28, 2018

To: Matt Fanghella
MS4 Coordinator
Virginia Department of Environmental Quality
Tidewater Regional Office
5636 Southern Blvd.
Virginia Beach, VA 23462
Matthew.Fanghella@deq.virginia.gov

From: Ellen Roberts

RE: City of Poquoson Permit Year 5 Annual Report for VAR040024

Transmitted via email

The following general information is provided in accordance with Permit Section II.E.3 Annual Report requirements:

a. Background Information

(1) Name and State Permit Number: City of Poquoson, Virginia; VAR 040024

(2) Annual Report Permit Year: Permit year 4: July 1, 2017-June 30, 2018

(4) Number of new MS4 outfalls and associated acreage by HUC added during the permit year: One new MS4 outfall was added during this permit year. A 14" x 23" HERCP (equivalent 18" diameter) pipe outfall at a stormwater wet pond outfall that discharges into Lambs Creek in the Poquoson River Watershed. The HUC12 is 020801080101, CB21, the Lower Chesapeake Bay-Poquoson River. The outfall receives runoff from 5.90 acres.

(3) Modifications to any operator's department's roles and responsibilities: The roles and responsibilities listed on the City's annual report spreadsheets remain the same. The City is has hired a second engineer. Garrett Feagans is assisting with permit requirements. He is

also performing some of the City's erosion and sediment control and stormwater inspections on development projects.

(5) Signed Certification is attached.

b. The status of compliance with state permit conditions, an assessment of the appropriateness of the identified best management practices and progress towards achieving the identified measurable goals for each of the minimum control measures:

Spreadsheets and associated documents for the minimum control measures are attached. Progress toward meeting the identified measurable goals is presented in the spreadsheets. The City of Poquoson complied with its PY 5 goals.

The City of Poquoson was audited this year by DEQ. Attached please find the Audit Report.

c. Results of information collected and analyzed, including monitoring data, if any, during the reporting period:

No monitoring was required or performed. Results of BMP actions and evaluations of their effectiveness are presented in the spreadsheets.

d. A summary of the stormwater activities the operator plans to undertake during the next reporting cycle:

A program plan that includes a summary of stormwater activities that the operator plans to undertake during the next reporting cycle is attached.

e. A change in any identified best management practices or measurable goals for any of the minimum control measures including steps to be taken to address any deficiencies:

The permit program plan was upgraded in Permit Year (PY) 1 to reflect permit requirements. This was necessary because the general permit was not finalized at the time the registration statement was submitted. The program plan is numbered in accordance with and reflects the final general permit. No additional changes were planned or undertaken in PY5.

f. Notice that the operator is relying on another government entity to satisfy some of the state permit obligations (if applicable);

The City of Poquoson has entered into a regional memorandum of agreement with other localities and the Hampton Roads Planning District Commission to participate in a regional stormwater program. The MOA and the annual status report on regional cooperative efforts are attached as part of BMP 1. The City of Poquoson relies on the Hampton Roads Planning District Commission Regional Stormwater Program to satisfy or partially satisfy various educational and training requirements. Details are provided in the associated MOA,

Summary of Regional Stormwater Activities, and Regional Stormwater Education program (AskHRgreen) annual report.

g. The approval status of any programs pursuant to Section II.C of the general permit (if appropriate), or the progress towards achieving full approval of these programs:

n/a

h. Information required for any applicable TMDL special conditions contained in Section I of the general permit:

The City of Poquoson submitted a Chesapeake Bay TMDL action plan with its PY2 annual report. It was approved by DEQ in PY3. The City has completed construction of the two new best management practices described in the plan. With their completion in early PY4, the City will have met and exceeded its Bay TMDL requirements for the current permit cycle (5% reduction). Poquoson's MS4 did not receive any other TMDL wasteload allocation before the issuance of the current general permit. A bacterial TMDL was finalized in PY5 for the Poquoson and Back Rivers. An Action Plan for this TMDL will be developed during the upcoming permit cycle, in accordance with state requirements.

Changes to the permit plan for permit year 5 (FY2017-2018):

None were made during the permit period. The general permit was not finalized and approved by the State Water Control Board until September of 2018. The permit plan and permit schedule will be updated in accordance with the new permit requirements.

Required Program Plan Updates: Table 1

Table 1 of the General Permit provides interim deadlines for updating the Program Plan. Please find status reports on required updates below:

Permit Years 1 through 3-Required Updates:

Updates completed 12, 24 and 36 months after permit coverage were described in Permit Year 1, 2 and 3 Annual Reports. These include the updates required in Table 1: Schedule of MS4 Program Plan Updates Required in this Permit 12 and 24 months after permit coverage. Information is briefly provided in the Status of Compliance Spreadsheets and can be found in the PYs 1-3 Annual Reports found on the City Website.

Permit Year 2 Requirement for Bay TMDL: Section I.C: Special Conditions for the Chesapeake Bay TMDL Update: New information

In accordance with permit requirements, the City of Poquoson submitted an action plan with its second permit year report and received approval from DEQ for the action plan on February 10, 2016. The approval letter is found in the Appendix. During the current permit year, the City completed construction of two BMPs: a wet pond that receives runoff from the City Hall campus, and a constructed wetland that borders Victory Boulevard and receives runoff from that road and the Oxford Run ditch system. Now that these facilities are complete, the City has implemented its state-approved action plan for the first 5 year cycle, and has met and exceeded permit-requirements for phosphorous, nitrogen and sediment removal.

See the Appendix for additional information on Chesapeake Bay TMDL loads, reductions and activities.

Permit Year 3 Requirement: I B: Special Conditions For Approved TMDLs other than the Chesapeake Bay TMDL Update: New information

Poquoson is not subject to any TMDLs that allocated a wasteload to the City and were approved before the permit cycle began on July 1, 2013. Poquoson is subject to only two non-Bay TMDLs: The Back River Bacterial TMDL, and Poquoson River Bacterial TMDL. Both of these TMDLs were developed in 2014 and approved by the State Water Control Board on June 30, 2014. DEQ notified the City and other stakeholders on December 7, 2015 that the Back River and Poquoson River Bacterial TMDLs contained a math error and were being recalculated. This letter is found in the Appendix. Per DEQ, the TMDLs will be brought back to the State Water Control Board for approval once they have been corrected. Poquoson staff members

participated in the TMDL development process by attending a public meeting; providing comment through a regional comment letter; and providing requested information to DEQ.

Poquoson continues to take steps to reduce bacterial loads in our receiving streams. These include public education, work to connect households on septic tanks to the City's sewer system, use of pet waste stations, and other actions. Information on these actions is provided in the Status of Compliance spreadsheets and the Appendix.

Permit Year 4 Required Updates:

Permit Year 4 Requirement: Section II B 3 a (3): Outfall Map Update:

The outfall map is due in PY4 and was completed before June 30, 2017, in accordance with permit requirements. The outfall table was updated to reflect information determined during the map development. Both documents are included in the annual report. No new outfalls were added in this permit year.

Permit Year 4 Requirement: Section II B 6 b (3): SWPPP Implementation Update:

The Public Works Yard SWPPP was finalized and implemented prior to June 30, 2017, in accordance with permit requirements. A copy of the SWPPP is found in the Appendix. The Appendix also provides information on staff involvement in creating and implementation of the SWPPP.

Permit Year 5 Requirements Status Report:

Permit Year 5 Requirement: Section II B 6 c (1) (b): NMP Implementation Update:

The City is required to use a nutrient management plan for 40% of its managed turf by the end of PY3. At this time, 5.05 acres and one of the two managed turf sites are under a nutrient management plan. That constitutes 50% of the sites and 78% of the managed turf acreage. In addition, Poquoson opted to not apply fertilizer to the remaining site. This means that 100% of the applicable turf sites were either managed using NMP or were not fertilized. This exceeds permit requirements. More information is provided on the Status of Compliance spreadsheets and the Appendix.

Reporting Requirements

In addition to General Information and Table I Program Plan updates, the City provides the following information on permit activities

General Permit Section I: Special Conditions

Section I.B.5. The City was not subject to any other TMDLs other than the Chesapeake Bay TMDL that allocated an applicable wasteload to the Poquoson MS4 prior to the issuance of the permit. In PY5, the State Water Control Board and the EPA approved bacterial TMDLs for the Poquoson and Back Rivers. These TMDLs and their allocated wasteloads were previously approved by the State Water Control Board in June 2014. However, in PY3, DEQ notified the City that a math error had been made and that the TMDLs would be recalculated and taken back to the State Water Control Board for approval. The DEQ letter and associated emails are found in the Appendix and noted on the Status of Compliance Spreadsheet. These documents also detail steps the City is taking to reduce bacteria in local waters.

Section I.C.4: The City of Poquoson submitted a Chesapeake Bay TMDL Action Plan with its second year annual report. This plan was amended and resubmitted to DEQ in January 2016 in response to DEQ review comments, and was approved by DEQ. Information on the action plan and Poquoson's Bay program are found in the status of compliance spreadsheets and the appendix.

During the PY4, the City completed construction of two BMPs listed in the plan for implementation during the permit period. With their completion, Poquoson met its Action Plan goals and exceeded the 5% removal requirement for phosphorous, nitrogen, and TSS. In PY5, 3 additional homes was taken off septic tank and connected to sewer. These BMPs are being reported in an electronic format with the PY4 annual report.

During PY5, City staff monitored the recently installed BMPs. Additional plantings occurred at the constructed wetlands, and vegetation appears to be well established. Staff also developed an action plan for the next permit cycle and submitted it to DEQ by the June deadline. Staff members are currently participating in the state's Phase III WIP process.

General Permit Section II: Minimum Control Measures:

Minimum control measures and the reporting requirements for those measures are addressed in the Status of Compliance Spreadsheets, with associated documents provided in the Appendix. Below please find a brief summary of some information required for Permit Section II minimum control measures. Additional information on these requirements and

information on all other requirements are found in the Status of Compliance Spreadsheets and Appendix.

Annual reporting requirements: (Section II.B.6.g)

II.B.6.g (1): Annual Summary on development and implementation of the daily operational procedures:

Daily operational procedures and the Public Works Yard itself have been upgraded during Permit Years 1-4. Past improvements to the standard operating procedures include several of the techniques they learned in an EPA forum. This year staff actively participated in the development of the SWPPP. They provided a tour for the consultant preparing the plan and provided responses to consultant questions and requests for information. Based on this interaction, they made minor changes to their SOP's. They reviewed the draft SWPPP and provided comments on the document. Public Works staff members take an active role in developing and implementing their operational procedures. This permit year staff continued implementing the SWPPP.

The City of Poquoson also replaced the double walled, double fuel, above ground storage tank at the Public Works yard during PY5. This tank was found to have an internal leak in the barrier separating the diesel and gasoline compartments. No spills or leaks external to the tank occurred. The City used a fueling station outside City limits in York County during much of the permit year as this work took place. The new tank meets all applicable requirements and had been tested. It will be routinely inspected in accordance with permit requirements.

II.B.6.g (2): Annual Summary on development and implementation of the required SWPPP:

A SWPPP has been developed and implemented at the Public Works yard. This is the City's high priority facility, housing Public Works, Utilities, Vehicle Maintenance and Parks and Recreation maintenance staff, equipment and operations. In PY4, Public works staff members worked closely with a professional engineering consultant to create the SWPPP. The document is based on the staff's standard operational procedures and suggested improvements by the consultant engineer. The consultant was provided the City's SOP's and other documents; inspected the facility; and worked directly with staff members to create a document the document. Improvements made to the yard as part of this effort included more signage; more conveniently located spill kits; and formalizing ongoing good practices. Ongoing work includes staff members continuing to identify potential pollutants and their sources, and to eliminate them. The SWPPP reflects last year's changes in material and equipment storage and upgraded inspection procedures. In the last 6 years, the City has replaced its doublewalled fuel tank; upgraded its used oil disposal and storage facility; replaced and upgraded its wash rack; constructed a new chemical storage facility; added more signs and spill kits; and made other improvements.

II.B.6.g. (3): Nutrient management plans: The City accomplished this goal early. The City has 6.47 acres (two sites, one with 1.42 acres; one with 5.05 acres) of one one-acre-or-more, contiguous, managed turf. The 5.05 acre-site is managed by a contractor that maintains a nutrient management plan for the site. The 1.42 acre site was not fertilized this year.

II.B.6.g (4): Training is required biannually. It was held during PY2 and again in PY4. An additional training session was conducted in PY5. This year's training session was attended by Public Works, Utilities, Vehicle Maintenance, and Parks and Recreation maintenance employees.

The City's Environmental Compliance Officer and City Inspector participated in various continuing education courses on water quality and erosion and sediment control. These courses are provided in this annual report. More information on these training events and certifications are found in the attached spreadsheets and appendix.

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CITY OF POQUOSON

500 CITY HALL AVENUE, POQUOSON, VIRGINIA 23662-1996
(757) 868-3000 TELEPHONE (757) 868-3101 FAX

Office of the City Manager
J. Randall Wheeler

CERTIFICATION

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



Responsible Official Signature

10/1/18

Date

VAR 040024

City of Poquoson, VA

Permit Number

MS4 Name

Status of Compliance

Spreadsheets describing actions and status, supplemented by Appendix

City of Poquoson Annual Report

VAR# 040024

Permit Year 5 (PY5): July 1, 2017-June 30, 2018

Submitted to DEQ October 1, 2018

Updated MS4 Program Plan July 1, 2013 - June 30, 2018
City of Poquoson VAR 040024

1. Public Outreach and Education							
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	PY5 STATUS
	Continue to implement the public education and outreach program as included in the registration statement until the program is updated to meet the conditions of General Permit No. VAR040027			SW Program Administrator	End of PY1	PY1 Program Plan	Compliant; program was updated to meet General Permit conditions and new program plan submitted with PY1 annual report.
1.1	Update Public Education and Outreach Program						
1.1a	Design a plan to educate citizens on techniques to reduce impacts of stormwater pollution on public waterways with an emphasis on impaired waters by first identifying at least 3 high-priority water quality issues	Identify at least 3 high priority water quality issues that contribute to the discharge of stormwater	Issues identified	askHRgreen.org Stormwater Education Subcommittee	PY1	Education and Outreach Plan	Compliant. Completed in PY1. See Appendix

Updated MS4 Program Plan July 1, 2013 - June 30, 2018
City of Poquoson VAR 040024

1. Public Outreach and Education						
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
1.2	Regional Media Campaign to Address High Priority Issues	Participate in the askHRgreen.org regional media campaign which will make impressions with a stormwater message via print, television (local municipal access, cable and local affiliate), radio, and social media				
						Compliant. See below for compliance with specific program plan requirements.
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	Percentage of target audience reached through activities.	askHRgreen.org Stormwater Education Subcommittee	Annually	FY 17 Target Audience Percentages Summary is also provided in Appendix. Information is also provided in http://askhrgreen.org/wp-content/uploads/2011/06/askHRgreenFY17AnnualReport_final.pdf (link to AskHRGreen annual report). AskHRgreen annual report in appendix.
						Compliant. 27.5% of target audience reached through media campaign. In addition to regional campaign, giveaways and information are provided in City Hall. See appendix

Updated MS4 Program Plan July 1, 2013 - June 30, 2018
City of Poquoson VAR 040024

1. Public Outreach and Education						
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
1.2b	Promote Lawn Care campaign	Run media campaigns and make lawn care best management practice guides available.	Percentage of target audience reached through activities.	askHrGreen.org Stormwater Education Subcommittee	Annually	FY 17 Target Audience Percentages Summary is also provided in Appendix. Information is also provided in http://askHrGreen.org/wp-content/uploads/2011/06/askHrGreenFY17AnnualReport_final.pdf (link to AskHrGreen annual report). AskHrGreen annual report, Appendix
						Compliant. Media campaign reached 27.5% of target audience for proper disposal of yard waste and 27.4% of total for proper use of fertilizer and promotion of soil testing. Informational brochures and giveaways provided at City Hall offices and Public Works office.

Updated MS4 Program Plan July 1, 2013 - June 30, 2018
City of Poquoson VAR 040024

1. Public Outreach and Education						
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
1.2c	Promote FOG campaign	Participate in the askHRgreen.org regional media campaign which will make impressions with a stormwater message via print, television (local municipal access, cable and local affiliate), radio, and social media	Percentage of target audience reached through activities.	askHRgreen.org Stormwater Education Subcommittee	Annually	FY 17 Target Audience Percentages Summary is also provided in Appendix. Information is also provided in http://askhrgreen.org/wp-content/uploads/2011/06/askHRgreenFY17AnnualReport_final.pdf (link to Ask HRGreen annual report). AskHRgreen annual report, Appendix
						Compliant. Medial campaign for Reducing SSO's and proper disposal of fats, oil and grease reached 45.9% of the audience. See target audience percentages in appendix.
1.2f	Relevant Message Implementation	Conduct sufficient education and outreach activities designed to reach an equivalent 20% of each high priority audience.	Demographic, reach, frequency, & website click-through rates	askHRgreen.org Stormwater Education Subcommittee	Annually	http://askhrgreen.org/wp-content/uploads/2011/06/askHRgreenFY17AnnualReport_final.pdf
						Compliant. See askHRgreen annual report in appendix for percentage of high priority audience

Updated MS4 Program Plan July 1, 2013 - June 30, 2018
City of Poquoson VAR 040024

1. Public Outreach and Education							
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	PY5 STATUS
1.2g	Provide for adjustment of target audiences and messages to address any observed weaknesses or shortcomings	Website feedback reports, regional meeting feedback	Number of giveaways distributed	askHRgreen.org Representative	Annually	See AskHRGreen annual report in Appendix or online at http://askhrgreen.org/wp-content/uploads/2011/06/askHRgreenFY17AAnnualReport_final.pdf	Compliant. SeeAskHRGreen annual report.
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: Most events were posted on the main website page: http://www.ci.poquoson.va.us/ . The Adopt a Spot program is advertised on the City Manager's page: http://www.ci.poquoson.va.us/158/City-Manager .	15 public participation events were held; 11 were volunteer opportunities that were posted on the City website. See Appendix, BMP 2 section for public participation events and advertisement samples. Events included site clean ups; participation in comprehensive plan advisory group; and other waste take back/collection programs.

Updated MS4 Program Plan July 1, 2013 - June 30, 2018
City of Poquoson VAR 040024

5. Public Outreach and Education						
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
1.3b	Regional Initiatives	Submit articles for askHRgreen.org blog and/or to the City newsletter for public participation in water quality improvement initiatives.	Number and types of events submitted	askHRgreen.org Representative	Annually	askHRgreen.org website or Island Tide . See Appendix
						Compliant. Two articles were submitted to the Island Tide, a circular that is mailed to every household in the City. In addition, warm weather environmental information was posted on the City website. See Appendix.
1.3c	Regional Outreach	Post volunteer opportunities on the City website and/or askHRgreen.org calendar	Number and types of events submitted	askHRgreen.org Representative & HRPDC Environmental Educator	Quarterly	askHRgreen.org website See Appendix
						15 public participation events were held; 11 were volunteer opportunities that were posted on the City website. See Appendix, BMP 2 section for public participation events and advertisement samples. Events included site clean ups; participation in comprehensive plan development; Bay Star Homes; Keep Poquoson Beautiful. The postings were placed on city media because we have found that produces more volunteers.

Updated MS4 Program Plan July 1, 2013 - June 30, 2018
City of Poquoson VAR 040024

1. Public Outreach and Education						
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
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	askHRgreen.org summary materials. See Appendix
1.3e	Maintain and enhance askHRgreen.org website	Increase website visits each year	Website click-through rates-Annual askHRgreen.org website visits	HRPDC & askHRgreen.org	Permit Cycle	askHRgreen.org summary materials. See Appendix
1.4	Participate in regional committees: askHRgreen.org , RSMC, and SW Phase II Subcommittee		Maintain valid MOA	HRPDC	Every 5 years (concurrent with MS4 permit cycle).	MOA and Regional Program annual summary of cooperation. See Appendix
						Compliant. 1,495 giveaways were provided at City Hall, in volunteer bags, and at the Poquoson Seafood Festival (865 giveaways at Festival). See appendix for detailed list of the number distributed of each type of giveaway.
						Compliant. See Appendix. Also, link from City Website to askHRgreen.org : http://www.ci.poquoson.va.us/168/Engineering
						Compliant. See "Regional Cooperation in Stormwater Management, Fiscal Year 2017-2018: A Status Report" and AskHRGreen report.

Updated MS4 Program Plan July 1, 2013 - June 30, 2018
City of Poquoson VAR 040024

1. Public Outreach and Education							
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	PY5 STATUS
1.4a	Regional Cooperation	Renew MOA with the HRPDC to participate in the regional processes, including the Regional Stormwater Management Committee, Stormwater Phase II Subcommittee and askHRgreen.org	Number of meetings attended/Number of meetings held	askHRgreen.org Representative	Annually	askHRgreen.org summary materials. See Appendix	Compliant. MOA in appendix. This was finalized in PY4.
1.4b	askHRgreen.org	Participate in at least 35% of askHRgreen.org Stormwater Education Subcommittee meetings	Number of meetings attended/Number of meetings held	SW Program Administrator	Annually	Attendance chart. See Appendix	50% attended. See appendix.
1.4c	Stormwater Phase II Subcommittee	Participate in at least 50% of Stormwater Phase II Subcommittee Meetings.		SW Program Administrator, askHRgreen.org, askHRgreen.org Representative & HRPDC	As scheduled in permit	Revised Program Plan. See Appendix	67% of meetings attended. Compliant.

Updated MS4 Program Plan July 1, 2013 - June 30, 2018
City of Poquoson VAR 040024

L. Public Outreach and Education						
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
1.5	Evaluation and Assessment	Evaluate and assess progress towards meeting measurable goals.				
						Compliant. askHRgreen meeting attendance has increased.

Updated MS4 Program Plan July 1, 2013 - June 30, 2018
City of Poquoson VAR 040024

2. Public Involvement/Participation							
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	PY 5 STATUS
2.1	Public Involvement						
2.1a	Updated Program Plan	Post copies of updated program plan to City website within 30 days of submittal of annual report.	Presence of materials on website	askHRgreen.org Representative & IT Department	Annually	Locality website: http://www.ci.poquoson.va.us/278/Environmental-Information	COMPLIANT
2.1b	Annual Report	Post copies of annual report to City website within 30 days of submittal to DEQ.	Presence of materials on website	askHRgreen.org Representative & IT Department	Annually	Locality website: http://www.ci.poquoson.va.us/278/Environmental-Information	COMPLIANT
2.1c	Reapplication Public Involvement	Prior to reapplying for coverage, notify public and provide for receipt of comments on the proposed MS4 Program Plan.	Presence of materials on website	askHRgreen.org Representative & IT Department	6 mo. prior to end of permit cycle	Locality website: http://www.ci.poquoson.va.us/278/Environmental-Information	Compliant. Information on annual permit provided on website and in old permits. Program plan posted.
2.2	Public Participation						

Updated MS4 Program Plan July 1, 2013 - June 30, 2018
City of Poquoson VAR 040024

2. Public Involvement/Participation						
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
2.2	Public Participation in a minimum of four local activities annually	Keep Poquoson Beautiful; Clean The Bay; Drug Take Back; multiple talks at civic groups on Bay TMDL Action Plan and clean water	# events, # of items distributed, # of participants, # of pounds collected, or # of volunteer hours	SW Program Administrator, askHRgreen.org Representative	Annually	PY5 Public Education and Participation Events summary spreadsheet in appendix . Detailed information on some events also provided in Appendix.
						Compliant. 15 events. This year's events included Keep Poquoson Beautiful; aDrug Take Back Day; Earth Day clean up; and the City's Seafood Festival. More details are on summary sheet in appendix.
	Evaluation and Assessment	Evaluate and assess progress towards meeting measurable goals.	In accordance with Section II E of General Permit VAR040027	SW Program Administrator	Annually	Annual report
						Compliant. Volunteer/staff efforts were well attended.

Updated MS4 Program Plan July 1, 2013-June 30, 2018
City of Poquoson, VA VAR 040024

3. Illicit Discharge Detection and Elimination						
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
3.1	Storm Sewer System Map					
3.1.a	MS4 outfall map	Maintain and update mapping	Updated Map	SW Program Administrator/ IT Dept. (GIS)	Annually; Complete outfall map PY4.	Outfall map
						Compliant. Map was completed in PY4. See Appendix. The map was updated to show the one outfall added to the MS4 this permit year. Map revision is shown in Appendix.
3.1.b	MS4 outfall information table	Table listing outfall ID, acreage served, receiving water, applicable TMDL(s).	Updated Table	SW Program Administrator/ IT Dept. (GIS)	Annually	Information Table. See appendix
						Compliant. Information Table was updated and expanded to provide more data in PY4. See Appendix. Table was updated in PY5 to provide data on one new outfall (B054) and the drainage area for another outfall was revised to reflect subdivision drainage (B035).
3.1.c	MS4 boundaries map and information table	Map and information table identifying MS4 watershed within 2010 urbanized area.	Boundary Map	SW Program Administrator/ IT Dept. (GIS)	End of PY4	MS4 Area Map
						Compliant. MS4 service area was provided to DEQ in Chesapeake Bay Action Plan. The action plan is on the City website at http://www.ci.poquoson.va.us/DocumentCenter/Home/View/865 . The map is on page 18 of the Bay TMDL Action Plan. This information is included on outfall maps. Catchment areas (drainage areas) provided in outfall table. The new development/outfall are part of a subdivision that was developed in accordance with the VSMP requirements. Therefore no additional retrofits are required. The revised MS4 area will be incorporated into the City's 2018-2023 Bay TMDL Action Plan.

Updated MS4 Program Plan July 1, 2013-June 30, 2018
City of Poquoson, VA VAR 040024

3. Illicit Discharge Detection and Elimination							
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	PY 5 Status Appendix p. 101 - 147
3.1.d	Public information	Make MS4 map and information table available to the public	Presence of materials on website or refer to availability location	SW Program Administrator	Annually	Locality website	Compliant. Information available in City Engineer's office and online in Bay TMDL Action Plan at http://www.ci.poquoson.va.us/278/Environmental-Information .
3.1.e	New outfalls	Identify new points of discharge	List of new outfalls	SW Program Administrator/ IT Dept. (GIS)	Annually	New outfall list	Compliant. One new outfall was constructed in PY5: B054. The outfall has been added to the outfall information table. See Appendix.
3.1.f	Maintain a Current Storm Sewer Map Online				PY4	Online mapping	Compliant. Pipe schematic map on City Maps website: http://poquoson.mapsdirect.net/Account/Logout . Outfall map available in annual report on http://www.ci.poquoson.va.us/278/Environmental-Information and at the City Engineer's office.
3.1.g	Cooperation with adjacent MS4s	Identify and notify, in writing, any downstream regulated MS4 to which the small regulated MS4 is physically interconnected of the small regulated MS4's connection to that system.	Develop map, Regional Phase II Stormwater Subcommittee Meetings, letters	SW Program Administrator	Annually	Letters; meeting attendance. See Appendix.	Compliant. City of Poquoson is downstream of all other regulated MS4's. Our system drains directly into state waters. VDOT notified us that their MS4 did not drain into the City's system. City Engineer provided location of interconnectedness. No new information or contact from VDOT. See Appendix for most recent correspondence.

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3. Illicit Discharge Detection and Elimination						
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
3.1.h	Illicit Discharge Detection & Elimination Ordinance	Continue implementing and enforcing the illicit discharge/stormwater ordinance.	Current Ordinance	SW Program Administrator/ Fire Dept	As necessary	Ordinance : Poquoson City Code, Chapter 34, Article V, Sections 34-205 through 208; website link: https://www.municode.com/library/va/poquoson/codes/code_of_ordinance?s?nodeId=PTIICOOR_CH34EN_ARTVSTMA
3.2	Dry Weather Screening					
3.2.a	DWS Protocol	Develop written dry weather field screening methodologies for IDDE.	Protocol	End of PY1	End of PY1	DWS Protocol. See Appendix
3.2.b	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. Per DEQ, only summary table provided, along with one typical inventory field sheet. See Appendix .
3.3	IDDE program implementation				End of PY1	IDDE Protocol
						Compliant. DWS Protocol continues to be followed. See Appendix
						Compliant. 68 outfalls and 28.7 miles outfall ditching inspected. Please note that Poquoson's outfall inspections actually involve both outfalls and the upstream ditching that makes up the majority of the City's system.
						Compliant. Finished in PY1.

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3. Illicit Discharge Detection and Elimination						
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
						PY 5 Status Appendix p. 101 - 147
3.3.a	Public IDDE Reporting	Promote & Publicize IDDE reporting	Presence of phone number & information on website	SW Program Administrator	Continuously	Locality website & appendix
3.3.b	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	Summary of responses; Fire Department protocol.
3.3.c	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 Summary Sheet; Summary of responses; property owner letter in Appendix .
3.3.d	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. See Appendix
						Compliant. No SSO's occurred in PY5. List of work for three months provided as an example of typical work is provided in appendix. Entire year log is available on request. This year work focused on improvements/pump upgrades at pump stations. New generators were installed to keep pump stations operational during tidal storm events. Utilities department continues to closely monitor, maintain, and upgrade system on regular basis. TV'ing used on suspected defect areas of system.

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3. Illicit Discharge Detection and Elimination							
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	PY 5 Status Appendix p. 101 - 147
3.4	Spill reporting						
3.4.a	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).	Number of internal reports. If applicable, obtain PREP number.	SW Program Administrator/ Fire Dept	Fire Dept. Report in accordance to Section III. G.	Internal Summary Report. See Appendix	Compliant. Fire Department forms are attached. This year the Fire Department reported to 20 hazardous materials calls. See summary in appendix. In addition, the Department continued to use its air boat for marine spill training (see picture in appendix of boat and booms) and developed UAV capabilities for use in marine spill detection via infrared cameras.
3.4.b	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. See appendix p. 142 - 147.	No sanitary sewer overflows reported in PY5.
3.5	Update Program Plan	Update Illicit Discharge Detection and Elimination plan as necessary to maintain compliance with the permit effective on July 1, 2013		SW Program Administrator/ Fire Dept	As scheduled in permit		PY1 task. Compliant.

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3. Illicit Discharge Detection and Elimination						
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
3.6	Evaluation and Assessment	Evaluate and assess progress towards meeting measurable goals.	In accordance with Section II E of General Permit VAR040027	SW Program Administrator/ Fire Dept	Annually	<u>In accordance with an oral request from DEQ, a summary of illicit discharge screening forms, not all the forms, will be provided to DEQ in order to reduce paperwork. Forms are available through the City upon request</u> Compliant. Continue Consent Order work so that hurricane impacts/high tide impacts are minimized. Continue citizen education on keeping debris out of ditches and reducing fertilizer discharge). New air boat is proving to be a regional asset, and this year the City gained a new tool with UAV spill detection capability.

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4. Construction Site Storm Water Runoff Control

BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	PY 4 Status: Appendix p. 49-223
4.1	Legal Authorities						
4.1.a	LD Activities > 10,000 SF	Continue to implement the Stormwater Management Ordinance & the Erosion and Sedimentation Control Ordinance	Stormwater Management Ordinance & Erosion and Sedimentation Control Ordinance	SW Program Administrator	Continuously	SWM & E&SC Ordinances online and letters from state. See Appendix	Compliant. Both SWM & ESC ordinances are available at https://www.municode.com/library/va/poquoson/codes/code_of_ordinances?nodeId=PTIICOOR_CH34EN
4.1.b	CBPA LD Activities >2,500 SF	Continue to implement the Chesapeake Bay Preservation Ordinance	Chesapeake Bay Preservation Ordinance	CBPA Program Administrator	Continuously	CBPA Ordinance on line and email from state in appendix	Compliant. CBPA ordinance available online at https://www.municode.com/library/va/poquoson/codes/code_of_ordinances?nodeId=PTIICOOR_APXAZO_ARTXI.IVENMAAREMOVDI
4.1.c	E&SC LD Activities	Continue to implement the Erosion and Sedimentation Control Ordinance	Erosion and Sedimentation Control Ordinance	E&SC Program Administrator	Continuously	E&SC Ordinance	See 4.1.a (above) for weblink to ordinance
4.1.d	Individual Lot or CPOD LD Activities > 10,000 SF	Continue to implement the SWM, E&SC, & CBPA ordinances	SWM, E&SC, & CBPA Ordinances	SW, E&SC, & CBPA Program Administrators	Continuously	Ordinances	See 4.1.a and 4.1.b (above) for weblinks to ordinances
4.2	Local Programs						
4.2.a	E&SC Plan Reviews	Continue to implement the site plan review, LID implementation where deemed appropriate, provisions of the local Erosion and Sediment Control Ordinance.	# plan reviews	Planning Department/ Engineering Division	Annually	Summary from Locality tracking system. See Appendix for list of projects.	Compliant. 22 plan reviews: 18 single family home in lieu of reviews; 4 multi-family developments were reviewed. Please note that construction has decreased significantly from last year's totals.

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4. Construction Site Storm Water Runoff Control						
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
4.2.b	E&SC Program Consistency	At a minimum be consistent with the VA E&SC Law and regulation	State Board finding of consistency	E&SC Program Administrator	Continuously	Letter from DEQ (or DCR in prior cycles). See Appendix
4.2.c	CBPA Program Compliance	Maintain the City's Chesapeake Bay Preservation Act Program in Compliance with DEQ regulations	DEQ Compliance	CBPA Program Administrator (Environmental Compliance Officer in Poquoson)	Annually	Letter from DEQ (or DCR in prior cycles). See Appendix
4.2.d	Public Inquiry	Continue to receive and respond to information from citizens relating to the local erosion and sediment control program through personal visits, email, telephone, and the City web page.	# of calls/requests, #site visits	E&SC Program Administrator (Environmental Compliance Officer in Poquoson)	Annually	Summary from Locality tracking system. See appendix for summary and info.
4.3	Compliance and Enforcement					Construction was down this year from last year. The City staff did not receive any calls or complaints from citizens regarding erosion and sediment control.

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4. Construction Site Storm Water Runoff Control						
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
4.3.a	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 and inspection procedures are in appendix . Inspection forms, pictures and developer communications typical of City's inspection are found in enforcement section of appendix . Other examples found in enforcement section.
						Compliant. 690 inspections were conducted, primarily on single family home projects. Residential subdivision inspections were also conducted.
4.3.b	E&SC Inspection Schedule and Enforcement	Continue to implement inspection schedule and enforcement provisions per local Erosion and Sediment Control Ordinance	# of inspections; # enforcement actions	E&SC Program Administrator	Annually	Summary from Locality tracking system. See information on NOV's & backup info in appendix. Number of inspections found above in 4.3a.
						Compliant. One Notice to Comply was issued for ongoing violations. This is found in the appendix. A reminder email to a single-family (in lieu of) project is also attached. The NTC was issued because of repetitive failures to repair/replace older E&SC measures and because of the installation of a 2nd, inadequate construction entrance. The issues were corrected promptly after the NTC was sent. Performance on the site has improved since the NTC.

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4. Construction Site Storm Water Runoff Control						
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
4.3.c	E&SC Modifications due to inadequacy	Continue to implement provisions of the local Erosion and Sediment Control Ordinance requiring changes to the plan due to inadequacy.	# of inspections; # enforcement actions	E&SC Program Administrator	Annually	Summary from Locality tracking system. See appendix.
						Compliant. See summary information and typical inspection forms/photos/communications. Inadequate silt fencing and drain inlet protection was pointed out to contractors and corrected prior to next City inspection. This is standard practice.
4.3.d	Tracking and Reporting	Continue to track and report the total number of permitted land disturbing activities as well as the total disturbed acreage.	Number of permits & acres disturbed	E&SC Program Administrator	Annually	Spreadsheet of permits issued.
4.4	Certifications					22 permits and in lieu of agreements issued for a total of 8.62 acres of disturbance. See appendix for active permits.
4.4.a	E&SC Certifications	Ensure that plan reviewers, inspectors, and program administrators obtain the appropriate certifications as required under the Erosion and Sediment Control Law	Certifications obtained	E&SC Program Administrator	Ongoing	Certifications.
						The Environmental Compliance Officer holds the dual combined Administrator certification for stormwater and erosion and sediment control programs. This was recertified and is good until November 2021. The engineer received erosion and sediment control and stormwater inspector certifications. The City Inspector is also certified to conduct erosion and sediment control inspections. A temporary employee hired for the summer also held certifications in E&SC and stormwater inspections. See appendix.

4. Construction Site Storm Water Runoff Control

BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	PY 4 Status: Appendix p. 49-223
4.4.b	SWM Certifications	Ensure that plan reviewers, inspectors, and program administrators obtain the appropriate certifications as required under the Stormwater Management Act	Certifications obtained	VSMP Authority Administrator	Beginning in PY2	Certifications.	Compliant. The Environmental Compliance Officer holds the dual combined Administrator certification for stormwater and erosion and sediment control programs. The engineer received erosion and sediment control and stormwater inspector certifications. The City Inspector is also certified to conduct erosion and sediment control inspections. A building inspector is also certified in erosion and sediment control inspections and plan reviews, and in stormwater inspections. See appendix.
4.5	VSMP Authority Permits						
4.5.a	State VSMP program (prior to July 1, 2014)	Continue to direct applicants, proposing to disturb an acre or more of land or part of a larger common plan of development or sale that would disturb one acre or more, or >= 2,500 sq. ft. in CBPA areas to DEQ to secure a VSMP Permit for Discharges of Stormwater from Construction Activities. Ensure permit has been obtained.	#of permit applications and permits issued.	E&SC Program Administrator	PY1 only	VSMP permit numbers. See appendix.	Compliant. No new stormwater permit applications received or issued this year.

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4. Construction Site Storm Water Runoff Control						
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
4.5.b	Local VSMP program (after July 1, 2014)	Implement the site plan review, construction site BMP, and inspection provisions of the local Stormwater Management Ordinance.	# of permit applications and permits issued.	VSMP Authority Administrator	Beginning in PY2	VSMP permit numbers
						No new permits this year.
4.5.c	VSMP Inspections	Implement inspection provisions of the local Stormwater Management Ordinance for VSMP authority permits including Pollution Prevention Plans contained within the SWPPP	# of inspections; # enforcement actions	VSMP Authority Administrator	Beginning in PY2	Summary from Locality tracking system. See information on notices of violations in appendix
						273 Inspections were conducted this year; 0 enforcement actions were needed.
4.6	Update Program Plan	Update Construction Site Storm Water Runoff Control plan as necessary to maintain compliance with the permit		SW Program/E&SC Program Administrators & HRPDC	As scheduled in permit	Program Plan
						Compliant. No changes to program plan this year. However, City replaced a temporary inspector (Gregg Nance) a permanent new staff member (Garrett Feagans) who performs inspections.

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4. Construction Site Storm Water Runoff Control						
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
4.7	Evaluation and Assessment	Evaluate and assess progress towards meeting measurable goals.	In accordance with Section II E of General Permit VAR040027	SW Program/E&SC Program Administrators	Annually	Annual Report
						Compliant. One of the biggest challenges for staff is that the same data is being tracked for VSMP, E&SC, Ches Bay and MS4 programs. We appreciate DEQ's efforts to streamline data calls and look forward to this effort continuing.

5. Post Construction Storm Water Management in New Development and Redevelopment							PY 5 STATUS
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	
5.1	Address post-construction stormwater runoff from development that enters the MS4						
5.1.a	Applicable oversight requirements	CBPA LD activities < 1 Ac but >2,500 SF; and new development or redevelopment where a more stringent regulatory size threshold than previously indicated.	Stormwater Management Ordinance	SW Program Administrator	Update in PY2	SWM Ordinance	Compliant. Ches Bay Preservation Act requirements found in environmental overlay district ordinance, on City website: https://www.municode.com/library/va/poquoson/codes/code_of_ordinances?nodeId=PTIICOOR_APXAZO_ARTXLI_IVENMAAREMOVDI
5.1.b	Stormwater Management Ordinance	Implement the stormwater criteria of the Stormwater Management Ordinance for new development and redevelopment, and update ordinance to comply with Section II.B.5 of the General Permit.	Stormwater Management Ordinance	SW Program Administrator	Update in PY2	SWM Ordinance	Compliant. UPDATED ORDINANCE ON LINE AT https://www.municode.com/library/va/poquoson/codes/code_of_ordinances?nodeId=PTIICOOR_CH34EN_ARTVS_TMA
5.2	Inspection and O&M Verification for Privately-owned BMPs						
5.2.a	BMP Maintenance Agreements	Require BMP maintenance agreements as directed by the Stormwater Management Ordinance.	# of Agreements & Inspection Schedules	SW Program Administrator	Ongoing	List of Historic BMPs is in the Appendix. A sample BMP maintenance agreement provided to developers for their use is in the appendix.	All new BMPs are required to have maintenance agreements. See appendix for list of BMPs, agreement and inspection status, and sample maintenance agreement.

5.2.b	Inspection activities	Conduct BMP site inspections in accordance with written policies and procedures	# of Inspections	SW Program Administrator/ SW Inspector	As designated	Inspection Report Summary; Inspection Procedures	5 inspections of privately owned and maintained BMPs were conducted this year. City is working with older commercial properties and pond owners to establish better inspection protocol (BMPs constructed in early 2000's or 1990s with weak maintenance agreements). Owners are required by maintenance agreements to hire professional to conduct inspections; City inspections conform to requirements of City facility inspection checklists. See appendix.
5.2.c	Enforcement activities	Enforce BMP maintenance responsibilities in accordance with written policies and procedures	# of Reinspections & NOVs	SW Program Administrator/ SW Inspector	As designated	Inspection Report Summary. See appendix.	Compliant. City staff are working with owners of older, privately owned commercial property ponds to establish a regular inspection schedule for those facilities.
5.2.d	Alternative to Maintenance Agreements	Develop and implement alternative strategies for promoting long-term maintenance of stormwater controls to treat runoff solely from individual residential lots.	Alternative Strategies Protocol	SW Program Administrator & HRPDC	End of PY1	Alternative Strategies	Compliant. City has a highly successful public outreach program to remind the 145 single family BMP owners to inspect and maintain their facilities. See appendix for sample postcard.
5.3	Inspection & Maintenance Schedules for City-Owned BMPs						

5.3.a	Inspection and maintenance	Develop schedules and procedures for regular inspection and maintenance of locally owned stormwater control structures in accordance with SWM regulations.	# of inspections	SW Program Administrator	Annually	Inspection Report Summary; Inspection Procedures. See BMP Historic BMP data in Appendix	Compliant. No City-owned BMPs were due for an inspection this year. Inspection/maintenance procedures provided in appendix. Engineering staff visually inspected the new constructed wetlands and wet pond BMPs near City Hall (completed in PY4), and additional plantings and aeration were installed at the constructed wetlands.
5.4	Program Plan Requirements						
5.4.a	Roles and responsibilities	Identify the roles and responsibilities for each department, division, and subdivision in implementing Section II of General 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)	Compliant. Roles and responsibilities are listed on Compliance status and program plan spreadsheets. Poquoson hired a new engineer this permit year, and a temporary employee who was performing inspections while the engineering position was vacant moved on to full time employment elsewhere. The engineer assists with or performs e&sc and stormwater inspections. Regional MOA found in appendix under BMP 2.
5.5	Tracking and Reporting						
5.5.a	BMP Tracking	Track all known permanent stormwater management facilities that discharge to the regulated small MS4 and submit the information per General Permit No. VAR040027.	Data as required by Permit (print & spreadsheet/data base)	SW Program Administrator	Annually	BMP Report	Compliant. Data submitted to DEQ in PY3 as part of Historic Data Call effort. Two new privately-owned BMPs came on line this year. Development was very minimal within the City this year. Information is provided in appendix. Historic data BMP Table found in appendix.
5.5.b	New BMP tracking	BMPs brought online within the past year	Database or spreadsheet with new BMP information	SW Program Administrator	Annually	BMP Report	See appendix for data on two new privately owned BMPs.

5.6	Program Plan Updates	Update program plan to meet new general permit requirements.	SW Program Administrator	PY1	compliant. Program plan updated in PY1.
5.7	Evaluation and Assessment	Evaluate and assess progress toward goals	SW Program Administrator	Annually	Compliant. The PY5 retrofit on a HOA pond is the first one in the City and has so far been a smoothly run joint effort between HOA and community. The new Chesapeake Bay TMDL BMPs owned and installed by the City are functioning well and have already been upgraded with enhanced landscaping (public participation volunteer event) and aeration. More public participation is planned and City has applied for a grant for a volunteer event.

6. Pollution Prevention/Good Housekeeping for Municipal Operations

BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	PY 5 Status: See Appendix and weblinks for associated documents
6.1	Operations and Maintenance Activities						
6.1.a	Plans and Procedures	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. See annual reports permit years 1, 2 & 3; SWPPP in annual report PY4 on City's environmental website. SOP's were submitted in previous year annual reports and incorporated into facility SWPPP in PY4. Additional training on SWPPP was completed in PY 5; implementation began in PY 4 and continues in PY5.	Compliant. SOP's are online in annual reports PY 1, 2 & 3. In 2016-2017, PY4, SOP's were incorporated into facility SWPPP and are in the plan's appendix. These annual reports are available for viewing at https://www.ci.poquoson.va.us/278/Environmental-Information . The SWPPP is also available at the Public Works Yard office. The SWPPP is found on page 278 of the 2016-2017 annual report appendix; the SOP's are found in appendix sections for BMP 6 in previous annual reports.
6.1.b	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. See annual reports permit years 1, 2 & 3; SWPPP in annual report PY4 on City's environmental website. SOP's were submitted in previous year annual reports and incorporated into facility SWPPP in PY4.	Compliant. SOP's are online in annual reports PY 1, 2 & 3. In 2016-2017, PY4, SOP's were incorporated into facility SWPPP and are in the plan's appendix. These annual reports are available for viewing at https://www.ci.poquoson.va.us/278/Environmental-Information . The SWPPP is also available at the Public Works Yard office. The SWPPP is found on page 278 of the 2016-2017 annual report appendix; the SOP's are found in appendix sections for BMP 6 in previous annual reports.
6.1.c	Manage Municipal Vehicle Wash Water	Develop and implement procedures to prevent the discharge of municipal vehicle wash water into the MS4 without a separate VPDES permit	Procedures	Operations Personnel	Continuously	SOPs/ O&M Plan. See annual reports permit years 1, 2 & 3; SWPPP in annual report PY4 on City's environmental website. SOP's were submitted in previous year annual reports and incorporated into facility SWPPP in PY4.	Compliant. SOP's are online in annual reports PY 1, 2 & 3. In 2016-2017, PY4, SOP's were incorporated into facility SWPPP and are in the plan's appendix. These annual reports are available for viewing at https://www.ci.poquoson.va.us/278/Environmental-Information . The SWPPP is also available at the Public Works Yard office. The SWPPP is found on page 278 of the 2016-2017 annual report appendix; the SOP's are found in appendix sections for BMP 6 in previous annual reports.

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6. Pollution Prevention/Good Housekeeping for Municipal Operations

BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	PY 5 Status: See Appendix and weblinks for associated documents
6.1.d	Manage Wastewater	Prevent the discharge of wastewater to MS4 without a separate VPDES permit	# overflows	Department of Utilities	Continuously	SOPs/ O&M Plan. See SOP's and SWPPP at referenced weblink. Information on SSO's and the City's maintenance program for sewers is found in Appendix under BMP 3: Illicit Discharge Detection and Elimination	Compliant. There were no Sanitary Sewer Overflows reported in permit year 5. Information on system maintenance actions is found in BMP 3 information. SOP's for staff members working on the sewer system are online in annual reports PY 1, 2 & 3 . In 2016-2017, PY4, SOP's were incorporated into facility SWPPP and are in the plan's appendix. These annual reports are available for viewing at https://www.ci.poquoson.va.us/278/Environmental-Information . The SWPPP is also available at the Public Works Yard office. The SWPPP is found on page 278 of the 2016-2017 annual report appendix; the SOP's are found in appendix sections for BMP 6 in previous annual reports.
6.1.e	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. See weblinks.	Compliant. SOP's are online in annual reports PY 1, 2 & 3 . In 2016-2017, PY4, SOP's were incorporated into facility SWPPP and are in the plan's appendix. These annual reports are available for viewing at https://www.ci.poquoson.va.us/278/Environmental-Information . The SWPPP is also available at the Public Works Yard office. The SWPPP is found on page 278 of the 2016-2017 annual report appendix; the SOP's are found in appendix sections for BMP 6 in previous annual reports.

6. Pollution Prevention/Good Housekeeping for Municipal Operations						
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
						PY 5 Status: See Appendix and weblinks for associated documents
6.1.f	Bulk Storage BMPs	Require BMPs for bulk storage areas (salt storage, top soil stockpiles)	BMPs Used	Operations Personnel	Continuously	Compliant. The bulk storage facility was improved in PY3 following staff attendance of an EPA workshop. Information on these improvements are found in the PY3 annual report and include improved push walls/barriers. SOP's are online in annual reports PY 1, 2 & 3. In 2016-2017, PY4, SOP's were incorporated into facility SWPPP and are in the plan's appendix. These annual reports are available for viewing at https://www.ci.poquoson.va.us/278/Environmental-Information . The SWPPP is also available at the Public Works Yard office. The SWPPP is found on page 278 of the 2016-2017 annual report appendix; the SOP's are found in appendix sections for BMP 6 in previous annual reports.
6.1.g	Manage Leaking Municipally-owned Leaking Vehicles	Prevent the discharge of pollutants to the MS4	BMPs Used	Operations Personnel	Continuously	Compliant. SOP's are online in annual reports PY 1, 2 & 3. In 2016-2017, PY4, SOP's were incorporated into facility SWPPP and are in the plan's appendix. These annual reports are available for viewing at https://www.ci.poquoson.va.us/278/Environmental-Information . The SWPPP is also available at the Public Works Yard office. The SWPPP is found on page 278 of the 2016-2017 annual report appendix; the SOP's are found in appendix sections for BMP 6 in previous annual reports.

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6. Pollution Prevention/Good Housekeeping for Municipal Operations						
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
						PY 5 Status: See Appendix and weblinks for associated documents
6.1.h	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. Certifications are in the appendix . Compliant. three staff members updated their pesticide applicator certificates this permit year. These are in the appendix. SOP's are online in annual reports PY 1, 2 & 3. In 2016-2017, PY4, SOP's were incorporated into facility SWPPP and are in the plan's appendix. These annual reports are available for viewing at https://www.ci.poquoson.va.us/278/Environmental-Information . The SWPPP is also available at the Public Works Yard office. The SWPPP is found on page 278 of the 2016-2017 annual report appendix; the SOP's are found in appendix sections for BMP 6 in previous annual reports.
6.2	Storm Water Pollution Prevention Plans (SWPPP)					
6.2.1	High-priority facilities	Identify municipal high-priority facilities that have the potential to discharge stormwater pollutants	# & type of high-priority facility	SW Program Administrator	End of PY1	List of high-priority facilities found in PY1 report on City website: http://www.ci.poquoson.va.us/278/Environmental-Information and in the Appendix. Compliant. City has one high priority facility: a public works yard that houses all Public Works, garage, and Utilities personnel. This year the City's only fuel tank, a dual fuel, above ground large storage tank was replaced with a new tank after a leak was discovered at the divide between gasoline and diesel compartments. No spills occurred as the leak was internal to the tank. The City fueling station was closed for several months, and City vehicles used York County fueling stations. The new tank was tested and put in service in August 2018.

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6. Pollution Prevention/Good Housekeeping for Municipal Operations

BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	PY 5 Status: See Appendix and weblinks for associated documents
6.2.2	SWPPP development & Implementation	Develop and Implement SWPPPs for identified high-priority facilities	SWPPP	SW Program Administrator	PY4	SWPPP in appendix of PY 4 annual report at https://www.ci.poquoson.va.us/278/Environmental-Information , beginning on p. 279 of the third section of the 2016-2017 DEQ submittal.	Compliant. The SWPPP has been developed and implemented. Public Works, utilities, parks and rec maintenance and garage staff members were involved in the writing and implementing of the SWPPP to ensure the document would be implemented successfully. They continue to use forms and SOP's, upgrading as necessary. Additional training on SWPPP procedures was conducted for all Public Works, Utilities and other maintenance personnel on March 20, 2018. Sign in sheets for the training are in the appendix.
6.3	Nutrient Management Plans						
6.3.a	NMP Locations	Identify locations of municipally owned properties where nutrient management plans can be performed	Number of sites & area	SW Program Administrator & Landscape Division	End of PY1	List of managed turf sites > 1 Ac.	Compliant. Two sites were identified. See appendix.
6.3.b	NMP development & implementation	Develop and Implement NMPs for identified turf and landscape (15% by PY2, 40% by PY3; 75% by PY4; & 100% by PY5)	% of identified area under NMP	SW Program Administrator & Landscape Division	PY2 - PY5	List of NMP Covered Sites and NMP worksheet in Appendix.	Compliant. 100% of identified sites are either managed according to the NMP or are not fertilized at all. Plan is in appendix
6.3.c	NMP Tracking	Track the total acreage of lands where turf and landscape NMPs are required and implemented	Acreage required & Acreage implemented	SW Program Administrator & Landscape Division	Annually	List of managed turf sites > 1 Ac.	Compliant. Identified sites are either managed according to the NMP or are not fertilized at all. Plan is in appendix
6.3.d	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	Compliant: 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
6.4	Employee Education & Training						

6. Pollution Prevention/Good Housekeeping for Municipal Operations

BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	PY 5 Status: See Appendix and weblinks for associated documents
6.4.a	IDDE Training for field personnel	Provide training to field personnel in the recognition of illicit discharges	# of training sessions / # Employees trained	EMS Team	Biennial	Attendance list in Appendix. Note that PY 4 training met permit requirements for 5-year permit period; this training session was in addition to permit-required sessions.	Compliant. Training held this year for all public works, utilities and engineering staff. This training included the Rain Check video and also included information on the facility SWPPP. All full time employees were required to attend unless they were sick that day. The training supplemented staff involvement in developing the SWPPP. This was intended to provide a good understanding and successful implementation of the SWPPP requirements. Note: City staff is small. Consolidated training provided to all personnel at one time.
6.4.b	Streets & parking lot maintenance training	Provide training to Streets & Landscape Divisions for road, street & parking lot maintenance	# of training sessions / # Employees trained	EMS Team	Biennial	Attendance list in Appendix. Note that PY 4 training met permit requirements for 5-year permit period; this training session was in addition to permit-required sessions.	Compliant. Training held in house this year for all public works and utilities staff.
6.4.c	Public Works Facilities training	Provide training to PW personnel on good housekeeping and pollution prevention practices	# of training sessions / # Employees trained	EMS Team	Biennial	Attendance list in Appendix. Note that PY 4 training met permit requirements for 5-year permit period; this training session was in addition to permit-required sessions.	Compliant. Training held this year for all public works, utilities and engineering staff. 23 employees received training. In addition, staff was involved in developing the SWPPP so that they would have a good understanding of its requirements and successfully implement the plan. Public works employees also attend OSHA hazardous waste training on a rotating basis. 5 public works and utilities employees attended this year.
6.4.d	Pesticides & herbicide certifications	Maintain certifications and training for pesticide and herbicide applicators in accordance with Virginia Pesticide Control Act	Certifications obtained	SW Program Administrator	Continuously	Certifications in appendix p. 217 - 222	Compliant. See appendix for certifications.

6. Pollution Prevention/Good Housekeeping for Municipal Operations

BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	PY 5 Status: See Appendix and weblinks for associated documents
6.4.e	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	Certifications obtained	E&SC Program Administrator	Continuously	See certifications in appendix.	Compliant. The Environmental Compliance Officer holds the dual combined Administrator certification for stormwater and erosion and sediment control programs. The engineer received erosion and sediment control and stormwater inspector certifications. The City Inspector is also certified to conduct erosion and sediment control inspections. A building inspector is also certified in erosion and sediment control inspections and plan reviews, and in stormwater inspections. See appendix.
6.4.f	Parks and Recreation employee training	Provide training to P&R personnel on good housekeeping and pollution prevention practices	# of training sessions / # Employees trained	EMS Team	Biennial	Attendance list in Appendix. Note that PY 4 training met permit requirements for 5-year permit period; this training session was in addition to permit-required sessions.	Compliant. Training held this year for all public works, utilities, parks and rec maintenance and engineering staff. In addition, staff was involved in developing the SWPPP so that they would have a good understanding of its requirements and successfully implement the plan.
6.4.g	Emergency Response employee training	Provide training and certification in spill response to emergency response employees	Certifications obtained	Haz-Mat officer	PY1	See appendix p. 329 - 330 for Fire Dept.; see appendix p. 332-333 for ongoing hazardous waste training for other staff members that was conducted this year.	Compliant. All fire dept. personnel must have HazMat handling/spill response certification when hired. See appendix. Each member completed 6 hours of training for a total of 150 hours. Fire Department personnel also participated in DEQ-sponsored regional training for hazardous waste spills in marine environments. See appendix.
6.5	Tracking						
6.5.a	Training Needs Assessment	Determine any educational needs for employees and develop appropriate training and/or materials.	Training assessment	HRPDC & Phase II Stormwater Committee	1X per permit cycle	Training Plan in appendix p.334.	Compliant. Plan developed in PY1. See Appendix.

Updated MS4 Program Plan July 1, 2013-June 30, 2018
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6. Pollution Prevention/Good Housekeeping for Municipal Operations						
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
6.5.b	Training Schedule	Identify and prioritize pollution prevention education and training needs for municipal employees based on relative risk for stormwater pollution from municipal operations through the HRPDC Stormwater Phase II Subcommittee.	Training Schedule	HRPDC & EMS Team	Annually	See training plan in appendix and summary of regional cooperation (BMP 2) in appendix.
6.5.c	Training Materials	Distribute pollution prevention educational materials developed through the HRPDC/ askHRgreen.org to municipal employees engaging in operations with a high risk of discharging pollutants into the MS4.	# of items distributed	HRPDC & EMS Team	Annually	Compliant. This year's information focused on upgraded operations at Public Works yard (discussed with all employees in yard). Brochures and canvas tote bags are always available in Public Works building. Information was distributed to employees at training; SWPPP s also made available at the main office to employees.
6.5.d	Contractor Training	Participate in the development of at least one regional contractor training session during the life of the permit.	Training session	HRPDC & Phase II Stormwater Committee	Once per permit cycle	Compliant. Training session held in PY3.
6.6	Update Program Plan	Update Pollution Prevention/Good Housekeeping for Municipal Operations plan as necessary to maintain compliance with the permit effective on July 1, 2013		SW Program Administrator, EMS Team & HRPDC	As scheduled in permit	Compliant. PY1 activity.

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6. Pollution Prevention/Good Housekeeping for Municipal Operations						
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
6.7	Evaluation and Assessment	Evaluate and assess progress towards meeting measurable goals.	In accordance with Section II E of General Permit VAR040027	SW Program Administrator/E MS Team	Annually	Annual report
						Compliant. City's Public Works yard and operations continue to improve annually because of staff's engagement in the good housekeeping Stormwater Pollution Prevention Plan development.

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TMDL Special Conditions						
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
SC-1	TMDL					
SC-1a	Develop Chesapeake Bay TMDL Action Plan	Develop a TMDL Action Plan consistent with the Virginia Ph I and II WIPs to meet the Level 2 (L2) reductions of pollutants of concern (POC)	TMDL Action Plan	SW Program Administrator	End of PY2	TMDL Action Plan and DEQ approval letter available on City website http://www.ci.poquoson.va.us/278/Environmental-Information
						Compliant. Action plan submitted in accordance with permit requirements; revised per DEQ comments and approved by DEQ on February 8, 2016. A copy of the approval letter was provided with the PY3 annual report. Poquoson prepared and submitted a draft action plan for the next phase of the MS4 permit along with the City's registration statement at the end of PY5 in accordance with DEQ requirements. Draft plan is under DEQ review.
SC-1b	Implement Chesapeake Bay TMDL Action Plan	Implement the TMDL Action Plan to meet 5% of the Level 2 (L2) reductions of pollutants of concern (POC) by the end of the permit cycle.	Per TMDL Action Plan	SW Program Administrator	End of PY5	TMDL Action Plan and DEQ approval letter available on City website http://www.ci.poquoson.va.us/278/Environmental-Information
						Compliant. City completed actions listed in Bay TMDL Action Plan in PY4. The new BMPs called for in the plan (wet pond and constructed wetland) were completed and operational in PY4. City further enhanced the wetlands by providing more plantings and solar operated aerators to minimize algae growth. City exceeds 5% goal. In PY5, TWO (2) additional septic tanks were taken off line, emptied, filled with sand. Homes are now connected to sanitary sewer. Properties were at 85 Church Street & 173 Smith Street. This resulted in an additional 18,864 lb/yr of TN being removed. Pollution removal calculations are in the appendix.

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SC-2	Local TMDL	Develop and Implement a TMDL Action Plan for the POC(s)	TMDL Action Plan	SW Program Administrator	End of PY3	TMDL Action Plan. See Appendix for letters from DEQ on future wasteload allocations	n/a; No non-Bay TMDL wasteloads were allocated to the Poquoson MS4 prior to the issuance of the permit. Bacterial TMDLs for the Poquoson and Back River were approved by the SWCB and EPA in PY5. Action plans will be due next permit cycle. The City continues to provide educational materials, offer free boat privy pump outs and perform sewer maintenance work to reduce bacterial loads. See appendix for non-migratory goose control program on City property that has significantly reduced waste/bacterial loads at a park.
SC-3	Update Program Plan	Update TMDL Special Conditions plan as necessary to maintain compliance with the permit effective on July 1, 2013	Per Table I of Permit.	SW Program Administrator	As scheduled in permit	Information provided in the cover letter of this annual report; in spreadsheets; and in appendix.	Compliant. No TMDL Action Plan update required. City has completed action plan stated actions and exceeds permit requirements for Bay TMDL. Information on septic tank disconnect and on completed BMPs provided in appendix.
SC-4	Evaluation and Assessment	Evaluate and assess progress towards meeting measurable goals.	In accordance with Section II E of General Permit VAR040027	SW Program Administrator	Annually	Annual report	Compliant. The City has already begun work on bacterial TMDL and has met and exceeded the Chesapeake Bay TMDL Action Plan goals for this permit period. In accordance with new requirements, the City submitted a draft Bay TMDL Action Plan to DEQ in June that addresses required reductions during the next permit cycle.

PY 1 Program Plan

For use during the first permit year of the 2018-2023 permit period

City of Poquoson Annual Report

VAR# 040024

Permit Year 1(PY1)

Submitted to DEQ October 1, 2018

Updated MS4 Program Plan Permit Year 1

BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	PY 1 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	
1.1b	Rationale for selecting each of the 3 issues	Explain the importance of each issue	Rationale identified	askHRgreen.org Stormwater Education Subcommittee	PY1	Education and Outreach Plan	
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	
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	

Updated MS4 Program Plan Permit Year 1

BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	PY 1 Status
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	
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	
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	
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:	
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	

Updated MS4 Program Plan Permit Year 1

BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	PY 1 Status
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	
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	
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	
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 Permit Year 1

BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	PY 1 Status
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 1 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		
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		
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		
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		
2.2b	Identify a metric for each public participation activity	Identify metrics	Examples include the weight of debris collected or number of participants					
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		
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

3. Illicit Discharge Detection and Elimination								
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	PY 1 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		
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		
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		
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		
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		
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		
3.2	Dry Weather Screening (DWS)							

Updated MS4 Program Plan

3. Illicit Discharge Detection and Elimination						
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
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
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
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
3.3	IDDE program implementation					
3.3a	Maintain and implement written procedures for IDDE	Implement written IDDE procedures	Procedures	SW Program Administrator	Continuously	Procedures
3.3b	Public IDDE Reporting	Promote & publicize IDDE reporting	Presence of contact information on website	SW Program Administrator	Continuously	Locality website

Updated MS4 Program Plan

3. Illicit Discharge Detection and Elimination							
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	PY 1 Status
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	
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	
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	
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	
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	
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

4. Construction Site Storm Water Runoff Control							
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	PY 1 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	
4.2	Compliance and Enforcement						
4.2a	Written E&SC inspection procedures	Implement inspection procedures	Procedures	E&SC Program Administrator	Continuously	Procedures	
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	
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	
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	
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	
4.7	Evaluation and Assessment	Evaluate and assess progress towards meeting measurable goals.		SW Program/E&SC Program Administrators	Annually	Annual Report	

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5. Post Construction Storm Water Management in New Development and Redevelopment							PY 1 Status
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	
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	
5.2.c	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	

Updated MS4 Program Plan July 1, 2013 - June 30, 2018

5. Post Construction Storm Water Management in New Development and Redevelopment							PY 1 Status	
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents		
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		
5.2.c	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		

Updated MS4 Program Plan July 1, 2013 - June 30, 2018

5. Post Construction Storm Water Management in New Development and Redevelopment							PY 1 Status	
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents		
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		
5.2.c	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							

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5. Post Construction Storm Water Management in New Development and Redevelopment							PY 1 Status	
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents		
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		
5.2.c	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	Track all known permanent						

Updated MS4 Program Plan July 1, 2013 - June 30, 2018

5. Post Construction Storm Water Management in New Development and Redevelopment							PY 1 Status	
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents		
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		
5.2.c	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							
		Track all known permanent						

Updated MS4 Program Plan July 1, 2013 - June 30, 2018

5. Post Construction Storm Water Management in New Development and Redevelopment							Associated Documents		PY 1 Status	
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline					
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			
5.2.c	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	Track all known permanent								

Updated MS4 Program Plan

6. Pollution Prevention/Good Housekeeping for Facilities Owned or Operated by the Permittee						
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
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
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
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
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
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
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

Updated MS4 Program Plan

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 1 Status
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	
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	
6.2b	SWPPP Implementation	Maintain and implement SWPPPs for identified high-priority facilities	SWPPP	SW Program Administrator	Continuously	SWPPP	
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	
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	
6.4	Contractors						

Updated MS4 Program Plan

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 1 Status
	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.	
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	
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	
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	
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	

Updated MS4 Program Plan

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 1 Status
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
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
6.5g	Emergency Response employee training	Document spill management training for emergency responders	Certifications obtained	Haz-Mat officer	Annually	Certifications
6.6	Evaluation and Assessment	Evaluate and assess progress towards meeting measurable goals.		SW Program Administrator	Annually	Annual report

Updated MS4 Program Plan

TMDL Special Conditions							
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents	PY 1 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	
SC-1b	Provide opportunity for public comment on the updated Bay 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 Bay TMDL Action Plan	Record of Comments	
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	
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	
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	
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	
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	

Updated MS4 Program Plan

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	
SC-2f	Public comment period for the updated Local 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 Local TMDL Action Plan	Record of Comments	
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	
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	
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	
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	

Appendix

Supporting documents and supplemental reports

City of Poquoson Annual Report

VAR# 040024

Permit Year 5 (PY5): July 1, 2017-June 30, 2018

Submitted to DEQ October 1, 2018