

**VPDES General Permit for Small
Municipal Separate Storm Sewer Systems
Permit No. VAR040071**

Year 1 (2023-2024) Annual Report

Stafford County Public Schools

Submitted By:



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October 1, 2024

Annual Report 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.

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Date: 9/30/2024

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Background and Purpose

Stafford County Public Schools (SCPS) owns and operates a municipal separate storm sewer system (MS4). The MS4 consists of features such as curb inlets, drop inlets, swales, and stormwater management facilities (SWMFs) to convey, treat, and ultimately discharge stormwater runoff to surface waters. The discharge of runoff from the MS4 is regulated under the Clean Water Act, as amended and pursuant to the State Water Control Law and regulations adopted pursuant thereto. SCPS is authorized to discharge stormwater runoff from its MS4 under the Virginia Stormwater Management Program regulations, Virginia Pollutant Discharge Elimination System (VPDES) regulations, and the Virginia State Water Control Law.

SCPS is authorized to discharge stormwater in accordance with the General VPDES Permit for Discharges of Stormwater from Small MS4s (General Permit). As required by the General Permit, SCPS has developed an MS4 Program Plan that describes the best management practices (BMPs) it will implement to maintain compliance with the permit. The General Permit also requires SCPS to submit an annual report to the Virginia Department of Environmental Quality (DEQ) no later than October 1st of each year that reports on program implementation **from July 1st to June 30th** of the previous year. Consistent with the requirements of the General Permit, this annual report is annually completed as summarized in Table 1.

Table 1. General information required for annual reporting

Required Information	Location in Report
Permittee, system name, and permit number	Cover Page
Reporting period	Cover Page
Signed Certification	Page 'i'
Annual Reporting item(s) specified for each MCM	Provided for each BMP within the following sections
Evaluation of the program implementation, effectiveness, and necessary modifications	Provided for each BMP within the following sections

Compliance Summary

The following sections include the specific annual reporting required for each of the BMPs described in the SCPS MS4 Program Plan. For use in reference to this annual report, the Program Plan is provided on the SCPS stormwater management webpage. SCPS has evaluated the effectiveness of each program BMP, as described in the Program Plan as applicable. Table 2 summarizes the evaluation.

Table 2. Evaluation summary for each Program Plan BMP for the reporting year

BMP #	Description Summary	Effective
BMP 1A/B/C/D	Public Education and Outreach on Stormwater Impacts	Yes
BMP 2A/B/C	Procedures for Public Input and Dedicated MS4 Webpage	Yes
BMP 2D	Public Involvement Opportunities	Yes
BMP 3A	Storm Sewer Infrastructure Map and Information Table	Yes
BMP 3B	Prohibition of Unauthorized Non-stormwater Discharges	Yes
BMP 3C	Physical Interconnection Notification	Yes
BMP 3D/E	Detect and Address Illicit Discharges	Yes
BMP 3F/G	Illicit Discharge Tracking and Reporting	Yes
BMP 4A	Legal Authorities	Yes
BMP 4B	Erosion and Sediment Control (ESC) Plan Approval	Yes
BMP 4C/D	ESC Inspections	Yes
BMP 4E/F	ESC Compliance	Yes
BMP 4G	Roles and Responsibilities	Yes
BMP 4H	Land Disturbing Activity Tracking	Yes
BMP 5A/B/C	Legal Authorities	Yes
BMP 5D	Private SWMF Inspection and Enforcement	Yes
BMP 5E	SCPS SWMF Inspection and Maintenance	Yes
BMP 5F/G/H	Stormwater Management Facility Tracking	Yes
BMP 6A	Standard Operating Procedures	Yes
BMP 6B	High Priority Facilities and SWPPPs	Yes
BMP 6C	Nutrient Management Plans	Yes
BMP 6D	Employee Training	Yes
BMP 6E	Stormwater Discharge Control Measures for Contractors	Yes

The Program Plan may be updated or revised from time to time as part of an iterative process to reduce pollutant loadings and protect water quality.

Minimum Control Measure Annual Reporting

Reporting for each BMP described in the SCPS MS4 Program Plan to address each MCM is provided below. Please refer to the Program Plan for additional information for each BMP.

MCM 1: Public Education and Outreach

Annual reporting required for each BMP to address MCM 1, as described in the General Permit and MS4 Program Plan, is provided below.

BMP 1A/B/C/D – Address Water Quality Issues

Annual reporting associated with this BMP requires:

- A list of the high-priority stormwater issues SCPS addressed during the reporting year.
- A list of the strategies used to communicate each high-priority stormwater issue.

Table 3. Reporting for high-priority stormwater issues addressed during the reporting year

High Priority Stormwater Issue	Strategy	Measure of Effectiveness
Chesapeake Bay Water Quality	Curriculum Materials	<p>Approximately 11,896 students were educated on Chesapeake Bay water quality issues over the course of the year.</p> <ul style="list-style-type: none"> • Virginia Standards of Learning directed topics taught in grades one, three, four, five, and nine. <p>Approximately 3,772 high schooler students directly enrolled in Environmental science- related courses. Two (2) teachers from each high school were trained as Meaningful Watershed Education Experiences (MWEE) ambassadors by Friends of the Rappahannock. Ten (10) teachers participated in the five (5) month training how to facilitate student-led learning and inquiry into environmental issues.</p> <p>Students in North Stafford Horticulture class planted trees on the grounds. Fifteen (15) students participated in tree planting, and learned how trees are beneficial to water quality.</p>

Table 3. (Continued) Reporting for high-priority stormwater issues addressed during the reporting year

High Priority Stormwater Issue	Strategy	Measure of Effectiveness
Protecting Local Waterways	Media Material	<p>Three (3) Environmental Science courses were offered to English Language Learner level 1 and level 2 students. The materials include FOSS-full option system and demonstrate environmental aspects of soil use, water use, and conservation. Fifty-five to seventy-five (55-75) students attended in the 2023-2024 year.</p> <p>SCPS partnered with the Department of Public Works in 2023-2024 to virtually support the Local Government Education Week in Stafford County, where Public Works staff collaborated with SCPS to create a virtual field trip to a wastewater treatment plant that tied into Standards of Learning. SCPS continued using this resource and approximately 600 students participated virtually in the 2023-2024 year.</p>
Protecting Local Waterways	Curriculum materials	<p>SCPS collaborated with Stafford County to arrange a field trip to the municipal wastewater treatment plants. Twenty-five (25) Colonial Forge High School students attended the field trip and learned how wastewater is treated to reduce adverse effects on local water quality</p>
Human Impacts on Stormwater	Media Material	<p>Augmented Reality Sandboxes at each of the five (5) High Schools allow students to manipulate computer-generated topographic profiles and simulate rainfall and drainage properties. An estimated 4,200 students interacted in the 2023-2024 year.</p> <p>Students use ESRI Story Map Curriculum to virtually solve environmental problems. An estimated 2,100 High School students in Earth, Ecology, and Environmental Science courses participated.</p> <p>Each Elementary, Middle, and High School used at least one (1) point and non-point Enviroscope demonstrator, which closely resembles Stafford County landscape watershed areas. Approximately 3,700 students interacted in the 2023-2024 year.</p> <p>Each Middle School has a second Enviroscope model focusing on the coastal zone, stormwater, and wastewater drainage. This model demonstrates the closer connectivity between human impacts and water quality in Virginia's tidewater region. Approximately 1,600 Middle School students interacted in the 2023-2024 year.</p>

Table 3. (Continued) Reporting for high-priority stormwater issues addressed during the reporting year

High Priority Stormwater Issue	Strategy	Measure of Effectiveness
Human Impacts on Stormwater	Curriculum	Students in Colonial Forge High School Environmental Club maintained a water testing station built last year. Ten (10) high school students learned about water quality issues through practical experience in the 2023-2024 year.

Summary of BMP Effectiveness based on Program Plan Measurable Goal:

The measure of BMP effectiveness does not require Program Plan modification.

MCM 2: Public Involvement and Participation

Annual reporting required for each BMP to address MCM 2, as described in the General Permit and MS4 Program Plan, is provided below.

BMP 2A/B – Procedures for Public Input and Dedicated MS4 Webpage

Annual reporting associated with this BMP requires:

- A summary of any public input on the MS4 program received (including stormwater complaints) and how the permittee responded.
- A webpage address to the permittee’s MS4 program and stormwater website.

Table 4. Reporting for public input and MS4 webpage during the reporting year

Requirement	Measure of Effectiveness
Summary of Public Input	No public input was received during the reporting year.
Stormwater Webpage	https://www.staffordschools.net/about-us/departments/finance-and-operations/stormwater-management

Summary of BMP Effectiveness based on Program Plan Measurable Goal:

The measure of BMP effectiveness does not require Program Plan modification.

BMP 2D – Public Involvement/Participation Activities

Annual reporting associated with this BMP requires:

- A description of the public involvement activities implemented by the permittee;
- A report of the metric as defined for each activity and an evaluation as to whether the activity is beneficial to improving water quality; and

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

Table 5. Reporting for public involvement and participation activities during the reporting year

Involvement Type	Description of Activity	Report of Metric/Measure of Effectiveness	Collaboration
Public Education	County Student Government Day EnviroScape. 4 th Grade Students experienced an EnviroScape and learned how a watershed functions.	Approximately 375 students attended.	N/A
Public Education	The Annual Spring Science Regional Fair occurred in March. Middle and High Schools students presented projects of their choice. The competition encourages learning and inquiry.	Approximately ten (10) environmental themed presentations advanced to the regional level competition. Twenty-five (25) students participated across middle and high school	N/A
Educational Event	Colonial Forge High School Oceanography and Advanced Placement (AP) Environmental Science courses held their Rappahannock River Field experience. Students learned about land use, water resources, ecosystems, and biodiversity.	Sixty-one (61) students learned about the local environment by visiting the Rappahannock River.	N/A
Restoration	Students and staff participate in annual Friends of the Rappahannock (FOR) Riverfest.	Sixty (60) students volunteered with FOR at this event drawing awareness about the Rappahannock River	N/A
Restoration	Students and staff at Colonial Forge High School participate in Rappahannock River cleanup.	Forty (40) students and five (5) staff help remove trash and debris from the local waterways	

Table 5. (Continued) Reporting for public involvement and participation activities during the reporting year

Involvement Type	Description of Activity	Report of Metric/Measure of Effectiveness	Collaboration
Monitoring	Virginia Beach Oceanography field trips to preform water and sediment sampling while aboard the Rudee Flipper.	Approximately 265 high school students participated in sampling in Owls Creek Inlet and parallel to the beach front.	N/A
Restoration	Students picked up trash around the Colonial Forge High School grounds with an emphasis on how trash impacts the quality of the Chesapeake Bay.	Fifteen (15) high school students learned how local trash can impact the Chesapeake Bay.	N/A
Restoration	Students in Colonial Forge High School planted trees on the grounds.	Forty (40) students participated in tree planting, and learned how trees are beneficial to water quality.	N/A

Summary of BMP Effectiveness based on Program Plan Measurable Goal:

The measure of BMP effectiveness does not require Program Plan modification.

MCM 3: Illicit Discharge Detection and Elimination

Annual reporting required for each BMP to address MCM 3, as described in the General Permit and MS4 Program Plan, is provided below.

Annual reporting associated with this BMP requires:

- A confirmation statement that the MS4 map and information table have been updated to reflect any changes to the MS4 occurring on or before June 30 of the reporting year;
- The total number of outfalls screened during the reporting period as part of the dry weather screening program; and
- A list of illicit discharges to the MS4 including spills reaching the MS4 with information as follows:
 - The source of illicit discharge;
 - The dates that the discharge was observed, reported, or both;
 - Whether the discharge was discovered by the permittee during dry weather screening, reported by the public, or other method (describe);
 - How the investigation was resolved;
 - A description of any follow-up activities; and
 - The date the investigation was closed.

Confirmation Statement: MS4 Map & Information Table Updates:

In accordance with the General Permit and the SCPS Program Plan, SCPS confirms as part of this annual report that the MS4 map and information table have been updated to reflect any changes to the MS4 occurring during the reporting year.

Total number of outfalls screened during the reporting year:

- 52 (100%) outfalls within the SCPS MS4.

Table 6. Reporting for illicit discharges during the reporting year

Source	Date Observed/ Reported	Discovered By	Resolution	Follow-up Activities	Date Closed
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No Illicit discharges were observed during the reporting year.

Summary of BMP Effectiveness based on Program Plan Measurable Goal:

The measure of BMP effectiveness does not require Program Plan modification.

MCM 4: Construction Site Stormwater Runoff Control

Annual reporting required for each BMP to address MCM 4, as described in the General Permit and MS4 Program Plan, is provided below.

Annual reporting associated with this BMP requires:

- Total number of inspections conducted.
- The total number of enforcement actions implemented.
- A confirmation statement that land disturbing projects that occurred during the reporting period have been conducted in accordance with the current department approved standards and specifications for erosion and sediment control, and;
- Any land disturbing projects that occurred without department approved standards and specifications during the reporting period with erosion and sediment control plan approval dates for each project.

Table 7. Reporting for construction inspections and enforcement actions for the reporting year

Number of Inspections conducted	Number of Enforcement Actions	Enforcement Action Type
N/A	N/A	Stafford County performs all erosion and sediment control inspections.

Confirmation Statement: Land Disturbance Standards:

In accordance with the General Permit and the SCPS Program Plan, SCPS confirms as part of this annual report that all land disturbing projects that occurred during the reporting period have been conducted in accordance with the current department approved standards and specifications for erosion and sediment control.

Summary of BMP Effectiveness based on Program Plan Measurable Goal:

The measure of BMP effectiveness does not require Program Plan modification.

MCM 5: Post-Construction Stormwater Management for Development

Annual reporting required for each BMP to address MCM 5, as described in the General Permit and MS4 Program Plan, is provided below.

Annual reporting associated with this BMP requires:

- Total number of inspections conducted on stormwater management facilities owned or operated by the permittee;
- A description of the significant maintenance, repair, or retrofit activities performed on the stormwater management facilities owned or operated by the permittee;
- A confirmation statement that the permittee submitted stormwater management facility information through the Virginia Construction Stormwater General Permit database for those land disturbing activities for which the permittee was required to obtain coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities in accordance with Part III B1 or; a statement that the permittee did not complete any projects requiring coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities;
- A confirmation statement that the permittee electronically reported BMPs using the DEQ BMP Warehouse and the date on which the information was submitted.

Total Number of Inspections on Stormwater Management Facilities:

One (1) inspection was completed for each of the twenty (20) SCPS facilities located within the current regulated area. These inspections were completed with the annual dry weather illicit discharge screening inspections.

Description of Significant Maintenance, Repair, or Retrofit Activities:

All stormwater basins were maintained throughout the permit year through regular mowing and cleaning as necessary.

Confirmation Statement: Reporting to the DEQ BMP Warehouse:

SCPS electronically reported stormwater management facilities and BMPs implemented between July 1 and June 30 of the reporting period using the DEQ BMP Warehouse on October 1, 2019.

Confirmation Statement: General VPDES Permit Projects:

No projects requiring coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities were performed in the permit year on any SCPS property.

Summary of BMP Effectiveness based on Program Plan Measurable Goal:

The measure of BMP effectiveness does not require Program Plan modification.

MCM 6: Pollution Prevention & Good Housekeeping for Facilities

Annual reporting required for each BMP to address MCM 6, as described in the General Permit and MS4 Program Plan, is provided below.

BMP 6A – Standard Operating Procedures

Annual reporting associated with this BMP requires:

- A summary of any operational procedures developed or modified in accordance with Part I.E.6.a and b (of the General Permit) during the reporting period.
- SCPS did not develop any new or modify any existing standard operational procedures within the reporting year.

BMP 6B – High Priority Facilities and Stormwater Pollution Prevention Plans

Annual reporting associated with this BMP requires:

- A confirmation statement that all high-priority facilities were reviewed to determine if SWPPP coverage is needed during the reporting period;
- A list of any new SWPPPs developed in accordance Part I.E.6.i (of the General Permit) during the reporting period;
- A summary of any SWPPPs modified in accordance with Part I.E.6.j, 6.l, or 6.m (of the General Permit);
- The rationale of any high-priority facilities delisted in accordance with Part I.E.6.l or 6.m (of the General Permit) during the reporting period.

SWPPP Summary:

SCPS reviewed all facilities for which a SWPPP has not been developed by June 30, 2024. SCPS determined that there are no high-priority facilities owned or operated by SCPS with a high potential to discharge pollutants (as described in Part I.E.6.i of the General Permit) that do not already have a SWPPP. SCPS did not develop any new SWPPPs within the reporting year. None of the high-priority facilities with a high potential to discharge pollutants with existing SWPPPs had unauthorized discharge, release, or spill events within the reporting year. SCPS did not modify any existing SWPPPs within the reporting year.

Summary of BMP Effectiveness based on Program Plan Measurable Goal:

The measure of BMP effectiveness does not require Program Plan modification.

BMP 6C – Nutrient Management Plans

Annual reporting associated with this BMP requires:

- The status of each nutrient management as of June 30 of the reporting year

Table 8. Nutrient Management Plan Summary

Property	Management Area Location	Expiration date	Acreage	Plan Status
A.G. Wright MS & Garrisonville E.S.	100 Wood Drive Stafford, VA 22556	2/1/2025	14.6	Pending Renewal
Mountain View H.S.	2135 Mountain View Road Stafford, VA 22556	2/1/2025	9.5	No Renewal Needed
North Stafford H.S.	839 Garrisonville Road Stafford, VA 22554	6/30/2024*	15.8	Expired/No Renewal
Rodney Thompson M.S.	75 Walpole Street Stafford, VA 22554	2/1/2025	10.9	Pending Renewal
T. Benton Gayle M.S.	100 Panther Drive Fredericksburg, VA 22406	6/30/2024*	4.3	Renewed in Permit Year 2

*No fertilizer applied after plan expiration

Summary of BMP Effectiveness based on Program Plan Measurable Goal:

The measure of BMP effectiveness does not require Program Plan modification.

BMP 6D – Employee Training

Annual reporting associated with this BMP requires:

- A list of the training events conducted in accordance with Part I.E.6.d, including the following information:
 - The date of the training event;
 - The number of employees who attended the training event; and
 - The objective of the training event.

Employee training summary:

Sixty (60) SCPS employees and contractors attended training on good housekeeping and pollution prevention practices during the reporting period. The educational video was provided via the google classroom to in house staff, contracted custodial groups, and new staff. Topics included basics of stormwater management, parking lot maintenance, materials management practices, and proper disposal of cleaning solutions. The training included how to identify illicit discharges and included relevant photographs of illicit discharges or staining from cleaning solutions, dumpsters, oils, and sanitary sewers. Staff and contractors were given contact information to report illicit discharges. A component of the training included proper application and storage of deicing salts. SCPS used the google classroom system to track training progress and completion. This system allows staff and contractors to complete the training remotely on their own schedule while allowing SCPS to record attendance and provide follow-up if needed to ensure completion.

Summary of BMP Effectiveness based on Program Plan Measurable Goal:

The measure of BMP effectiveness does not require Program Plan modification.