

GENERAL PERMIT FOR
SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEMS (MS4)

PERMIT NO. VAR040113

PERMIT CYCLE: 2023-2028

**Millbrook High School and
Redbud Elementary School Campus**

**Chesapeake Bay TMDL Action Plan
Phase III
Draft**

Revised October 25, 2024



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Plan Purpose and Objective

The Millbrook High School / Redbud Run Elementary School campus has been designated as a small Municipal Storm Sewer System (MS4), located in the Potomac River Basin portion of the Chesapeake Bay watershed. As such, it is included in the overall Chesapeake Bay TMDL. In accordance with the General VPDES Permit for Discharges from Small Municipal Separate Storm Sewer Systems, it is required to develop a Chesapeake Bay TMDL Action Plan in order to meet the requirements of the overall TMDL. The Action Plan is required to provide a review of the current MS4 program, which demonstrates its ability to ensure compliance with the Special Condition and include the means and methods the permittee will use to meet the (Phase III) 100% of the Level 2 (L2) scoping run reduction for existing development by the end of the third permit cycle. This TMDL Action Plan has been prepared in accordance with the requirements of Guidance Memo No. 20-2003 "Chesapeake Bay TMDL Special Condition Guidance" as amended and dated 02/06/2021. GM20-2003 Part V, requires the TMDL Action Plan to address to following items:

1. Any new or modified legal authorities, such as ordinances, permits, policy, specific contract language, orders, and inter-jurisdictional agreements, implemented or needing to be implemented to meet the requirements of Part II A 3, A 4, and A 5.
2. The load and cumulative reduction calculations for each river basin calculated in accordance with Part II A 3, A 4, and A 5.
3. The total reductions achieved as of July 1, 2018, for each pollutant of concern in each river basin.
4. A list of BMPs implemented prior to July 1, 2018, to achieve reductions associated with the Chesapeake Bay TMDL including:
 - a) The date of implementation; and
 - b) The reductions achieved.
5. The BMPs to be implemented by the permittee prior to the expiration of this permit to meet the cumulative reductions calculated in Part II A 3, A 4, and A 5, including as applicable:
 - a) Type of BMP;
 - b) Project name;
 - c) Location;
 - d) Percent removal efficiency for each pollutant of concern; and
 - e) Calculation of the reduction expected to be achieved by the BMP calculated and reported in accordance with the methodologies established in Part II A 8 for each pollutant of concern; and
6. A summary of any comments received as a result of public participation required in Part II A 12, the permittee's response, identification of any public meetings to address public concerns, and any revisions made to Chesapeake Bay TMDL action plan as a result of public participation.
7. Prior to submittal of the action plan required in 9VAC25-890-40 Part II.A.11 , the permittee shall provide an opportunity for public comment on the additional BMPs proposed to meet the reductions not previously approved by the department in the first phase of the Chesapeake Bay TMDL Action Plan. This information on the proposed BMPs for this permit cycle that have not been previously approved must be public noticed for no less than 15 days.

Since the Millbrook HS / Redbud ES campus is a small MS4 which is currently developed in its existing condition, some of the elements which would apply to a municipal type MS4 will not apply. Each element is still included and discussed in the Action Plan to verify whether it is applicable.

1.0 Existing, New, or Modified Legal Authority

(MS4 General Permit Part II.A.11.a)

Any new or modified legal authorities, such as ordinances, permits, policy, specific contract language, orders, and inter-jurisdictional agreements, implemented or needing to be implemented to meet the requirements of Part II A 3, A 4, and A 5.

Frederick County Public Schools currently administers an MS4 program plan for the Millbrook HS / Redbud Run ES Campus. Property regulated by this MS4 program plan is owned by the Frederick County School Board and therefore they have the authority to enforce and/or perform all requirements of the program plan. As the property owner, FCPS has the legal authority to make changes to site amenities, existing stormwater structures, and create new stormwater BMP's. FCPS owns and maintains all of the existing stormwater BMP's and will maintain ownership and maintenance responsibility of any proposed stormwater BMP's required by this Action Plan to ensure compliance with this special condition.

No new or modified legal authorities are required to meet the requirements of MS4 General Permit *Part II A 3, A 4, and A 5.*

2.0 The Load and Cumulative Reduction Calculations for each River Basin

(MS4 General Permit Part II.A.11.b)

The load and cumulative reduction calculations for each river basin calculated in accordance with Part II A 3, A 4, and A 5.

The Millbrook HS / Redbud Run ES Campus MS4 drains entirely to the Potomac River Basin.

Frederick County Public Schools has AutoCAD files of the existing conditions at the Millbrook HS / Redbud Run ES Campus property from which the existing impervious and pervious areas have been calculated. Additionally, recent aerial photographs, GIS information, and field observations were used to determine the areas which could be designated as “forested”. These areas were reviewed and determined to be compliant with the criteria for “forested” areas set forth in Guidance Memo 20-2003. Several wetland areas are mapped on the school campus. Many wetland areas within “forested areas, while others are outside the “forested” areas.

Maps showing these designated areas are attached at the end of this report.

Unregulated Area(s) include:

1. Land regulated under any General VPDES permit that addresses industrial stormwater, including the General VPDES Permit for Stormwater Associated with Industrial Activity (VAR05), the General VPDES Permit for Concrete Products Facilities (VAG11), and the Nonmetallic Mineral Processing General Permit (VAR84);
2. Lands regulated under an individual VPDES permit for industrial stormwater discharges;
3. Forested Lands;
4. Agricultural Lands;
5. Wetlands; and,
6. Open Waters.

Below is a tabulation of existing land cover, regulated areas and unregulated areas.

Total MS4 Area = 128.41 acres
Forested Area = 32.25 acres (Unregulated Area)
Wetland Area = 0.31 acres (Unregulated Area)

Total Regulated Area = Total MS4 Area - Unregulated Area(s)
Total Regulated Area = 128.41 acres – (32.25 acres + 0.31 acres)
Total Regulated Area = 95.85 acres

Regulated Pervious Area = 61.54 acres
Regulated Impervious Area = 34.31 acres

An estimate of the annual POC Source Loads discharged from the existing sources as of June 30, 2009, based on the 2009 progress run is presented in the “MS4 EXISTING SOURCE LOAD COMPUTATIONS” table below.

**Estimated POC Load Based on the 2009 Progress Run =
(Regulated MS4 Area on 6/30/2009) x (2009 EOS Loading Rate)**

MS4 EXISTING SOURCE LOAD COMPUTATIONS						
REGULATED URBAN SUBSOURCE	POLLUTANT	REGULATED MS4 AREA (6/30/09)	x	2009 EOS LOADING RATE	=	ESTIMATED POC LOAD BASED ON 2009 PROGRESS RUN
		Acres		(lbs/ac/yr)		(lbs/yr)
<i>IMPERVIOUS</i>	<i>NITROGEN</i>	<i>34.31</i>	<i>x</i>	<i>16.86</i>	=	<i>578.47</i>
<i>PERVIOUS</i>	<i>NITROGEN</i>	<i>61.54</i>	<i>x</i>	<i>10.07</i>	=	<i>619.71</i>
TOTAL NITROGEN LOAD					=	1,198.17
<i>IMPERVIOUS</i>	<i>PHOSPHORUS</i>	<i>34.31</i>	<i>x</i>	<i>1.62</i>	=	<i>55.58</i>
<i>PERVIOUS</i>	<i>PHOSPHORUS</i>	<i>61.54</i>	<i>x</i>	<i>0.41</i>	=	<i>25.23</i>
TOTAL PHOSPHORUS LOAD					=	80.81
<i>IMPERVIOUS</i>	<i>TSS</i>	<i>34.31</i>	<i>x</i>	<i>1,171.32</i>	=	<i>40,187.99</i>
<i>PERVIOUS</i>	<i>TSS</i>	<i>61.54</i>	<i>x</i>	<i>175.80</i>	=	<i>10,818.73</i>
TOTAL TSS LOAD					=	51,006.72
MS4 Permit Table 3b was used to determine the 2009 EOS Loading Rate(s) necessary to calculate existing source loads from pervious and impervious lands served by the MS4 as of June 30, 2009.						

An estimate of the total POC Load Reductions Required, based on the 2009 progress run is presented in the “POC REDUCTIONS REQUIRED (POTOMAC RIVER BASIN) SUM TOTAL POC REDUCTIONS REQUIRED OVER 3 PERMIT CYCLES” table below.

Total MS4 Required Chesapeake Bay L2 POC Load Reduction(s) =
(POC Load Based on the 2009 Progress Run) x (MS4 Required CB L2 POC Loading Reduction Rate)

MS4 REQUIRED CB L2 POC LOAD REDUCTIONS						
REGULATED URBAN SUBSOURCE	POLLUTANT	ESTIMATED POC LOAD BASED ON 2009 PROGRESS RUN	x	MS4 REQUIRED CHESAPEAKE BAY L2 LOADING REDUCTION RATE	=	MS4 REQUIRED CHESAPEAKE BAY L2 POC LOAD REDUCTION
		(lbs/yr)		(%)		(lbs/yr)
<i>IMPERVIOUS</i>	<i>NITROGEN</i>	578.47	x	9.00%	=	52.06
<i>PERVIOUS</i>	<i>NITROGEN</i>	619.71	x	6.00%	=	37.18
TOTAL REQUIRED NITROGEN LOAD REDUCTION						= 89.24
<i>IMPERVIOUS</i>	<i>PHOSPHORUS</i>	55.58	x	16.00%	=	8.89
<i>PERVIOUS</i>	<i>PHOSPHORUS</i>	25.23	x	7.25%	=	1.83
TOTAL REQUIRED PHOSPHORUS LOAD REDUCTION						= 10.72
<i>IMPERVIOUS</i>	<i>TSS</i>	40,187.99	x	20.00%	=	8,037.60
<i>PERVIOUS</i>	<i>TSS</i>	10,818.73	x	8.75%	=	946.64
TOTAL REQUIRED TSS LOAD REDUCTION						= 8,984.24
MS4 Permit Table 3b was used to determine the MS4 Required CB L2 Loading Reduction Rate(s) necessary to calculate MS4 Required CB L2 POC Load Reduction(s).						
The calculated POC Load Reductions represent the SUM TOTAL POC REDUCTIONS REQUIRED OVER 3 PERMIT CYCLES						

3.0 The Total Reductions Achieved as of July 1, 2023, For Each Pollutant of Concern in Each River Basin

(MS4 General Permit Part II.A.11.c) The total reductions achieved as of July 1, 2018, for each pollutant of concern in each river basin.

The First Permit Cycle spanned from 2013 – 2018. A 5% Load Reduction was required to be completed by June 30, 2018. See the “FIRST PERMIT CYCLE (2013 – 2018)” table below. A summary of Required POC Load Reductions and Achieved Load Reductions Required is presented.

First Permit Cycle MS4 Required Chesapeake Bay L2 POC Load Reduction(s) = (Total MS4 Required Chesapeake Bay L2 POC Load Reduction(s)) x (0.05)

All POC Loads Achieved at least 5.0% Reductions.

POC REDUCTIONS REQUIRED FOR EACH PERMIT CYCLE							
FIRST PERMIT CYCLE (2013 - 2018)							
		REQUIRED LOAD REDUCTION		ACHIEVED LOAD REDUCTION COMPLETED FIRST PERMIT CYCLE			
REGULATED URBAN SUBSOURCE	POLLUTANT	THRU COMPLETED FIRST PERMIT CYCLE		FIRST PERMIT CYCLE ONLY	FIRST PERMIT CYCLE TOTAL	DIFFERENTIAL VS REQUIRED	PERCENTAGE OF TOTAL POC
		(%)	(lbs/yr)	(lbs/yr)	(lbs/yr)	(lbs/yr)	(%)
IMPERVIOUS	NITROGEN	5.00%	2.60				
PERVIOUS	NITROGEN	5.00%	1.86				
TOTAL REQUIRED NITROGEN LOAD REDUCTION =		4.46		4.57	4.57	0.11	5.12%
IMPERVIOUS	PHOSPHORUS	5.00%	0.44				
PERVIOUS	PHOSPHORUS	5.00%	0.09				
TOTAL REQUIRED PHOSPHORUS LOAD REDUCTION =		0.54		0.63	0.63	0.09	5.88%
IMPERVIOUS	TSS	5.00%	401.88				
PERVIOUS	TSS	5.00%	47.33				
TOTAL REQUIRED TSS LOAD REDUCTION =		449.21		1,042.26	1,042.26	593.05	11.60%

First Permit Cycle POC Loading Reductions
 One Hydrodynamic Separator Reductions:
 N = 4.57 lbs/yr, P = 0.63 lbs/yr and TSS = 1,042.26 lbs/yr

TMDL Action Plan Tracking Notes:
 Two TMDL Action Plans Prepared for the First Permit Cycle.
CB TMDL Action Plan Date: 7/1/2015 Rev: 12/10/2015
 This Action Plan proposed conversion of existing Dry Pond (SWM Area C) to Extended Detention.
 This Action Plan was not executed. Addendum 1 was prepared to revised the Action Plan.
CB TMDL Action Plan Addendum 1 Date: 1/24/2018
 This Action Plan proposed one Hydrodynamic Separator, in lieu of existing Dry Pond conversion to Extended Detention.
 This Action Plan was executed, satisfying the First Permit Cycle Required 5% POC Reductions.

The Second Permit Cycle spanned from 2018 – 2023. A Cumulative 40% Load Reduction was required to be completed by June 30, 2023. See the “SECOND PERMIT CYCLE (2018 – 23” table below. A summary of Required POC Load Reductions and Achieved Load Reductions Required is presented.

Second Permit Cycle MS4 Required Chesapeake Bay L2 POC Load Reduction(s) = (Total MS4 Required Chesapeake Bay L2 POC Load Reduction(s)) x (0.40)

All POC Loads Achieved at least 40% Cumulative Reductions.

POC REDUCTIONS REQUIRED FOR EACH PERMIT CYCLE										
SECOND PERMIT CYCLE (2018 - 2023)										
REGULATED URBAN SUBSOURCE	POLLUTANT	REQ'D LOAD REDUCTION		ACHIEVED LOAD REDUCTION (ENTIRE SECOND PERMIT CYCLE)						
		THRU COMPLETED SECOND PERMIT CYCLE		FIRST PERMIT CYCLE ONLY	+	SECOND PERMIT CYCLE TOTAL	=	FIRST & SECOND PERMIT CYCLE TOTAL	DIFFERENTIAL VS REQUIRED	PERCENTAGE OF TOTAL POC
		(%)	(lbs/yr)	(lbs/yr)		(lbs/yr)		(lbs/yr)	(lbs/yr)	(%)
IMPERVIOUS	NITROGEN	40.00%	20.82							
PERVIOUS	NITROGEN	40.00%	14.87							
TOTAL REQUIRED NITROGEN LOAD REDUCTION =			35.70	4.57	+	31.14	=	35.71	0.01	40.01%
IMPERVIOUS	PHOSPHORUS	40.00%	3.56							
PERVIOUS	PHOSPHORUS	40.00%	0.73							
TOTAL REQUIRED PHOSPHORUS LOAD REDUCTION =			4.29	0.63	+	4.65	=	5.28	0.99	49.24%
IMPERVIOUS	TSS	40.00%	3,215.04							
PERVIOUS	TSS	40.00%	378.66							
TOTAL REQUIRED TSS LOAD REDUCTION =			3,593.69	1,042.26	+	3,897.12	=	4,939.38	1,345.69	54.98%

Second Permit Cycle POC Loading Reductions
One Hydrodynamic Separator Reductions:
N = 9.67 lbs/yr, P = 1.60 lbs/yr and TSS = 2,837.27 lbs/yr
Nutrient Offset Credit Purchase Reductions:
N = 21.47 lbs/yr, P = 3.05 lbs/yr and TSS = 1,059.85 lbs/yr

TMDL Action Plan Tracking Notes:
 Two TMDL Action Plans Prepared for the Second Permit Cycle.
CB TMDL Action Plan Phase II Date: 5/18/2018 Rev: 9/21/2018
 This Action Plan was not executed and is void. Addendum 1 was prepared to revise the Action Plan.
CB TMDL Action Plan Phase II Addendum 1 Date: 7/27/2020
 This Action Plan proposed one Hydrodynamic Separator, in lieu of existing Dry Pond conversion to Extended Detention.
 This Action Plan was executed, satisfying the Second Permit Cycle Required Cumulative 40% POC Reductions.

4.0 A List Of BMPs Implemented Prior to July 1, 2023, To Achieve Reductions for The Chesapeake Bay

(MS4 General Permit Part II.A.11.d) A list of BMPs implemented prior to July 1, 2018, to achieve reductions associated with the Chesapeake Bay TMDL including: a) The date of implementation; and b) the reductions achieved.

One Hydrodynamic Separator was implemented prior to July 1, 2018.

This satisfied the First Permit Cycle Required POC Load Reductions.

PHASE I – Add Manufactured Hydrodynamic BMP

Subsource	Pollutant	Total Regulated Acres Served by BMP (06/30/09)	2009 EOS Loading Rate (lbs/acre/yr)	Estimated Total POC Load Based on 2009 Progress Run (lbs/yr)
Regulated Urban Impervious	Nitrogen	1.55	16.86	26.13
Regulated Urban Pervious		1.53	10.07	15.41
Regulated Urban Impervious	Phosphorus	1.55	1.62	2.51
Regulated Urban Pervious		1.53	0.41	0.63
Regulated Urban Impervious	Total Suspended Solids	1.55	1,171.32	1,815.55
Regulated Urban Pervious		1.53	175.80	268.97

Subsource	Pollutant	Total Existing Acres Served by BMP (06/30/09)	BMP Removal Rate (lbs/acre/yr)	Pollutant Removed (lbs/yr)
Total Regulated Area	Nitrogen	3.08	11%	4.57
Total Regulated Area	Phosphorus	3.08	20%	0.63
Total Regulated Area	Total Suspended Solids	3.08	50%	1,042.26

A second Hydrodynamic Separator was implemented prior to July 1, 2023.

It provided for a portion of the Second Permit Cycle POC Load Reductions. However, additional POC Load Reductions were necessary to achieve the minimum cumulative POC Load Reductions of 40% for the Second Permit Cycle.

PHASE II - Add Manufactured Hydrodynamic BMP

Subsource	Pollutant	Total Regulated Acres Served by BMPs (06/30/09)	2009 EOS Loading Rate (lbs/acre/yr)	Estimated Total POC Load Based on 2009 Progress Run (lbs/yr)
Regulated Urban Impervious	Nitrogen	4.72	16.86	79.58
Regulated Urban Pervious		0.83	10.07	8.36
Regulated Urban Impervious	Phosphorus	4.72	1.62	7.65
Regulated Urban Pervious		0.83	0.41	0.34
Regulated Urban Impervious	Total Suspended Solids	4.72	1,171.32	5,528.63
Regulated Urban Pervious		0.83	175.80	145.91

Subsource	Pollutant	Total Existing Acres Served by BMPs (06/30/09)	BMP Removal Rate (lbs/acre/yr)	Pollutant Removed (lbs/yr)
Total Regulated Area	Nitrogen	5.55	11%	9.67
Total Regulated Area	Phosphorus	5.55	20%	1.60
Total Regulated Area	Total Suspended Solids	5.55	50%	2,837.27

NonPoint Nutrient Offset Credits were acquired by the MS4 to achieve the minimum cumulative POC Load Reductions of 40% for the Second Permit Cycle.

Acquired Nutrient Offset Credits include:

Phosphorous (P) = 3.05 lbs/yr
 Nitrogen (N) = 21.47 lbs/yr
 Sediment (TSS) = 1,059.85 lbs/yr

See the Program Plan Appendix for the “Agreement for Purchase and Sale of NonPoint Nutrient Offset Credits”.

5.0 BMPs Implemented by the Permittee Prior to the Expiration of this Permit to Meet Cumulative Reductions

(MS4 General Permit Part II.A.11.e) The BMPs to be implemented by the permittee prior to the expiration of this permit to meet the cumulative reductions calculated in Part II A 3, A 4, and A 5, including as applicable: a) Type of BMP; b) Project Name; c) Location; d) Percent removal efficiency for each pollutant of concern; and e) calculation of the reduction expected to be achieved by the BMP calculated and reported in accordance with the methodologies established in Part II A 8 for each pollutant of concern.

Various options are available to the MS4 to meet the remaining Required POC Reductions by the end of the Third Permit Cycle, June 30, 2028. The MS4 is required to achieve 100% POC Load Reduction by the end of the Third Permit Cycle, June 30, 2028.

Frederick County Schools may elect to purchase nutrient credits to meet the Third Permit Cycle Loading Reduction Requirement. Alternative options may be implemented utilizing proprietary or non-proprietary BMP's should they be deemed more effective or less costly.

The quantity and location of any purchased nutrient credits or installed BMP's will be adequate to meet the required pollutant removal in this third permit cycle. The removal rates will be determined from the BMP clearinghouse and DEQ approved removal rates based on the BMP's selected. Phase III BMP's will be designed and bid so that construction can occur during the summer when school is not in session. All construction, or nutrient credit purchases, shall be completed before the end of the permit cycle. The table below details the remaining Loading Reduction Requirements for the third permit cycle.

POC REDUCTIONS REQUIRED FOR EACH PERMIT CYCLE												
THIRD PERMIT CYCLE (2023 - 2028)												
REGULATED URBAN SUBSOURCE	POLLUTANT	REQ'D LOAD REDUCTION		ACHIEVED LOAD REDUCTION (THRU PERMIT CYCLE YEAR 1)								
		THRU COMPLETED THIRD PERMIT CYCLE		FIRST PERMIT CYCLE ONLY	+	SECOND PERMIT CYCLE ONLY	+	THIRD PERMIT CYCLE-YEAR 1	=	CURRENT PERMIT TOTAL	DIFFERENTIAL VS REQUIRED	PERCENTAGE OF TOTAL POC
		(%)	(lbs/yr)	(lbs/yr)		(lbs/yr)		(lbs/yr)		(lbs/yr)	(lbs/yr)	(%)
IMPERVIOUS	NITROGEN	100.00%	52.06									
PERVIOUS	NITROGEN	100.00%	37.18									
TOTAL REQUIRED NITROGEN LOAD REDUCTION =			89.24	4.57	+	31.14	+	0.00	=	35.71	-53.53	40.01%
IMPERVIOUS	PHOSPHORUS	100.00%	8.89									
PERVIOUS	PHOSPHORUS	100.00%	1.83									
TOTAL REQUIRED PHOSPHORUS LOAD REDUCTION =			10.72	0.63	+	4.65	+	0.00	=	5.28	-5.44	49.24%
TSS LOAD REDUCTIONS ARE NO LONGER REQUIRED IN THE THIRD PERMIT CYCLE (2023 - 2028). TSS REDUCTIONS ARE NOW M00T.												

<p>TMDL Action Plan Tracking Notes: A Single TMDL Action Plan has been prepared for the Third Permit Cycle. CB TMDL Action Plan Phase 3 This Action Plan proposes consideration of multiple options to satisfy the required POC Load Reductions. See CB TMDL Action Plan Phase 3 - Section "5.0 Means and Method to Meet the Required Reductions and Schedule".</p>	<p>REQUIRED Third Permit Cycle POC Loading Reductions N = 53.53 lbs/yr and P = 5.44 lbs/yr</p>
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6.0 Public Comments on Draft Chesapeake Bay TMDL Action Plan (GENERAL PERMIT REQUIREMENTS MS4 General Permit Part II.A.11.f and Phase I PERMIT REQUIREMENTS)

A summary of any comments received as a result of public participation required in Part II A 12, the permittee's response, identification of any public meetings to address public concerns, and any revisions made to Chesapeake Bay TMDL action plan as a result of public participation.

Frederick County Public Schools will post the draft TMDL Action Plan to its website in the fall of 2024 and will send an announcement that it is available for public review and comment for a period of no less than 15 days. After which all public comments will be compiled, reviewed, and any changes to the TMDL Action Plan made.

The announcement may be made via the e-mail and on its Facebook page, publication in a local newspaper, or other acceptable means of notification.

7.0 Opportunity for Public Comment on Additional BMPs, Not Previously Approved

(MS4 General Permit Part II.A.12). *As required by 9VAC25-890-40 Part II.A.12, prior to submittal of the action plan, the permittee shall provide an opportunity for receipt of public comment on the Chesapeake Bay TMDL action plan; and a list of all public comments on the additional BMPs proposed to meet the reductions not previously approved by the department in the first phase Chesapeake Bay TMDL action plan for no less than 15 days.*

Frederick County Public Schools will post the draft TMDL Action Plan to its website in the fall of 2024 and will send an announcement that it is available for public review and comment for a period of no less than 15 days. After which all public comments will be compiled, reviewed, and any changes to the TMDL Action Plan made.

The announcement may be made via the e-mail and on its Facebook page, publication in a local newspaper, or other acceptable means of notification.