Municipal Separate Storm Sewer System Annual Report

Reporting Period: July 1, 2025 to June 30, 2026

Prepared for:
Mr. Ernest L. Nunley
Superintendent, Buildings and Grounds
Virginia Highlands Community College
PO Box 828, Abingdon, VA 24212

Prepared by (in collaboration with VHCC):
H2R Engineering Inc.
1601 S. Main St., Blacksburg, VA
Phone: 540.553.1682

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MS4 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."

Printed Name: Christine Fields

Signature: Christine Fields Digitally signed by Christine Fields Date: 2026.09.28 14:09:41 -04'00'

Title: Vice President of Finance & Adminstration

Date: 9/28/2026

Background and Purpose

Virginia Highlands Community College (VHCC) owns and operates a municipal separate storm sewer system (MS4). The college's MS4 consists of features such as curb and gutter, drop inlets, ditches, and stormwater management facilities 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. VHCC is authorized to discharge stormwater runoff from the campus's MS4s under the Virginia Stormwater Management Program Regulations, Virginia Pollutant Discharge Elimination System Regulations (VPDES), and the Virginia State Water Control Law.

VHCC 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, VHCC has developed an MS4 Program Plan that describes the best management practices (BMPs) the college will implement to maintain compliance with the permit. The General Permit also requires VHCC 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 of the previous year to June 30th of the current year. Consistent with the requirements of the General Permit, this 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 Statement	Page i
MS4 Program Evaluation	Summary provided on Page 2. Evaluation provided in "Measure of Effectiveness" section for reporting provided for each MCM BMP described in the MS4 Program Plan.

Compliance Summary

Reported information is consistent with the specific annual reporting required in the General Permit and the VHCC MS4 Program Plan, including supplemental information described in the Program Plan to measure effectiveness of each BMP. For use in reference to this annual report, the MS4 Program Plan is provided at the VHCC stormwater management webpage. 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 to the maximum extent practicable (MEP). VHCC has evaluated the effectiveness of each program BMP, as described in the Program Plan. Table 2 summarizes the evaluation to determine if any modifications to the Program Plan are necessary for the subsequent reporting year. Additional detail is provided in the reporting for the specific BMP.

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

BMP # [1]	Description Summary [1]	Effective		
1A	Public Education & Outreach	☑Yes	☐ No	☐N/A
2A	Dedicated Stormwater Webpage	☑Yes	☐ No	☐N/A
2B	Receive/Respond to Public Reports/Input	☑Yes	☐ No	☐N/A
2C	Public Involvement/Participation Activities	☑Yes	☐ No	☐N/A
3A	MS4 Map and Information Table	☑Yes	☐ No	☐N/A
3B	Prohibition of Non-stormwater Discharges	☑Yes	☐ No	☐N/A
3C	Implement/Enforce IDDE Written Procedures	☑Yes	☐ No	☐N/A
4A	Implement VCCS Stnds. & Specs for ESC	☑Yes	☐ No	☐N/A
4B	Control non-stormwater Discharges (construction)	☑Yes	☐ No	☐N/A
5A	Implement VCCS Stnds. & Specs for SWM	☑Yes	☐ No	☐N/A
5B	Inspection/Maintenance of SWM Facilities	☑Yes	☐ No	☐N/A
5C	SWM Facilities Reporting to DEQ	☑Yes	☐ No	☐N/A
6A	Implement Good Housekeeping Procedures	☑Yes	☐ No	☐N/A
6B	Conduct Annual Campus-wide SWPPP Evaluation	☑Yes	☐ No	☐N/A
6C	Nutrient Management Plans & Deicing Policy	☑Yes	☐ No	☐N/A
6D	Ensure Contract Language for GH/PP Controls	☑Yes	☐ No	☐N/A
6E	Conduct MS4 Employee Training	☑Yes	☐ No	☐N/A

[1] Refer to BMP section within the MS4 program plan for full description.

Minimum Control Measure 1: Public Education and Outreach

BMP 1A: Public Education and Outreach

For the reporting year, annual reporting associated with this BMP requires:

- ✓ A list of the high-priority stormwater issues (Table 1A);
- ✓ A summary of activities conducted for the report year, including strategies (Table 1A);
- ✓ A description of changes in high-priority issues, including a rationale (Table 1B); and
- ✓ An evaluation to determine BMP effectiveness and any necessary changes (Table 1B).

Table 1A. High priority stormwater issues and summary of outreach activities conducted. No activities conducted include information explicitly regarding climate change.

Priority Issue 1:	Stormwater impacts to surface waters and steps to reduce pollution.
Strategy:	Traditional Written Materials
Activity Summary:	Brochures distribute via email to students on identified issue.
Priority Issue 2:	Illicit discharge prohibition and enforcement, including disciplinary implications and reporting, hazards, and proper waste disposal.
Strategy:	Media Materials
Activity Summary:	Closed circuit TV slides aired throughout campus hallways.
Priority Issue 3:	Increase knowledge of pollutants of concern for local impaired waters.
Strategy:	Traditional Written Materials
Activity Summary:	Brochures distribute via email to grounds staff on identified issue.

Table 1B. BMP effectiveness evaluation from results of public surveys quiz (see Program Plan).

Strategies for each issue implemented?		☑Yes ☐No (If no, necessary actions below)	
Survey date distributed[1]:	07/26	No. of respondents:	18
Average score (Permit Year 1):	71%	Score satisfactory (Year 1)[2]:	☑Yes ☐No (See below)
Average score (Permit Year 3):	78%	Score satisfactory (Year 3)[2]:	☑Yes ☐No (See below)
Average score (Permit Year 5):	TBD	Score satisfactory (Year 5)[2]:	☐Yes ☐No (See below)
If "No" answered above, a description of changes and rationale for any changes:			
N/A. Satisfactory score in year 3 of permit, with an increase noted from year 1. BMP effective. Next survey to go out during year 5 of the permit period.			

[1] For reporting year. Surveys distributed biennially, consistent with outreach to a 2-year college.

[2] Satisfactory = average score > 70% and either an increase or no significant decrease from previous average scores.

Minimum Control Measure 2: Public Involvement and Participation

BMP 2A: Dedicated MS4 Webpage

For the reporting year, annual reporting associated with this BMP requires:

- ✓ A webpage address to the permittee's MS4 program and stormwater website (Table 2A);
- ✓ An evaluation to determine BMP effectiveness and any necessary changes (Table 2B).

Table 2A. Dedicated stormwater webpage information.

Webpage Address:	https://www.vhcc.edu/public-information

Table 2B. BMP effectiveness evaluation.

An annual assessment of the website was conducted to ensure all information required to be posted on the website is provided.[1]	☑Yes ☐No (If no, necessary actions below)
Description of updates to the webpage implemented during the reporting year:	
Added the 2024-2025 annual report to the webpage during the reporting period.	
If "No" answered above, a description of changes and rationale for any changes:	
N/A. Assessment performed and webpage updated. BMP effective.	

[1] Annual website assessment available upon request.

BMP 2B: Procedures for Receipt/Response to Public Reports and Input

For the reporting year, annual reporting associated with this BMP requires:

- ✓ A summary of public comments and how the permittee responded for (Table 2C):
  - Comments on the MS4 program; and
  - Stormwater pollution complaints (excluding natural flooding).
- ✓ An evaluation to determine BMP effectiveness and any necessary changes (Table 2D).

Table 2C. Dedicated stormwater webpage information.

Public Input on MS4 Program	
Procedures and opportunity provided for public comments on the MS4 program.	☑Yes ☐No (If no, see Table 2D)
Summary of public comments and permittee response to each (list):	
N/A. No complaints received for the reporting year.	
Public Reporting on Stormwater Pollution Complaints	
Procedures and opportunity provided for public to report stormwater pollution complaints.	☑Yes ☐No (If no, see Table 2D)
Summary of public complaints and permittee response to each (list):	
N/A. No complaints received for the reporting year.	

Table 2D. BMP effectiveness evaluation based on response to comments/complaints.

Response provided to all comments on the MS4 program and stormwater pollution complaints.	☐Yes ☐No ☑N/A
Documentation maintained for comments and complaints and permittee responses for each.[1]	☐Yes ☐No ☑N/A
If "No" answered in Table 2C or Table 2D, described reason and necessary changes and rationale:	
N/A. No comments or complaints. Opportunity provided to public to comment and report stormwater pollution via materials from BMP 1 and on the webpage (BMP 2A). BMP effective.	

[1] As applicable and listed in Table 2C. Documentation available upon request.

BMP 2C: Public Involvement/Participation Activities

For the reporting year, annual reporting associated with this BMP requires:

✓ A description of the public involvement activities with metrics (Table 2E):

✓ Determination of BMP effectiveness (benefit to water quality) and necessary changes (Table 2E).

Table 2E. Public involvement activities implemented by the permittee (4 minimum annually).

Involvement #1 (Type) [1,2,3]	Description of Activity	Beneficial to Water Quality
Disposal or Collection Event	Campus clean-up day event on (8/22/25)	☑Yes ☐No
Metric:	17 participants & 2 bags of trash collected	
Rationale for WQ benefit or necessary changes if no benefit:	Trash removed that could have been transported in stormwater.	
Involvement #2 (Type) [1,2,3]	Description of Activity	Beneficial to Water Quality
Pollution Prevention	Pet waste stations installed and maintained on campus. (Ongoing)	☑Yes ☐No
Metric:	2 stations maintained on campus.	
Rationale for WQ benefit or necessary changes if no benefit:	Removes pet waste from exposure to stormwater runoff.	
Involvement #3 (Type) [1,2,3]	Description of Activity	Beneficial to Water Quality
Monitoring	Wolf Creek macro-invertebrates health survey & assessment with Virginia Save Our Streams program (October 2025)	☑Yes ☐No
Metric:	15 biology students participated	
Rationale for WQ benefit or necessary changes if no benefit:	Data gathering to directly assess water quality impacts.	
Involvement #4 (Type) [1,2,3]	Description of Activity	Beneficial to Water Quality
Monitoring	Wolf Creek macro-invertebrates health survey & assessment with Virginia Save Our Streams program (April 2026)	☑Yes ☐No
Metric:	15 biology students participated	
Rationale for WQ benefit or necessary changes if no benefit:	Data gathering to directly assess water quality impacts.	

[1] Inherently, all college activities reach out and engage all economic and ethnic groups. If any education on climate change included, it is described in the involvement description.

[2] A minimum of 2 involvement types must be used annually.

[3] The permittee did not collaborate with other MS4 permittees, unless otherwise noted in the involvement description.

Minimum Control Measure 3: Illicit Discharge Detection and Elimination

BMP 3A: Maintain MS4 Map and Information Table

For the reporting year, annual reporting associated with this BMP requires:

- ✓ A confirmation statement that the MS4 map and outfall information table have been updated to reflect any changes to the MS4 occurring on or before June 30 of the reporting year (Table 3A)
- ✓ Determination of BMP effectiveness and necessary changes (Table 3B).

Table 3A. MS4 map and outfall information table confirmation statement.

Confirmation Statement: MS4 Map and Information Table	
"In accordance with the General Permit and Program Plan, VHCC *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."*	
The confirmation statement above is correct:	☑Yes ☐No (If no, necessary actions below)

Table 3B. BMP effectiveness evaluation based on review of MS4 map and outfall information table.

A review of the MS4 mapping and outfall information table (provided on mapping) finds changes during the reporting year are reflected on the mapping and within the table: [1]	☑Yes ☐No (If no, see below)
If "No" answered in Table 3A or Table 3B, described reason(s) and necessary change(s):	
N/A. MS4 mapping and information table are up to date. BMP effective.	

BMP 3B: Prohibition of Unauthorized Nonstormwater Discharges

For the reporting year, annual reporting associated with this BMP requires:

- ✓ A list of illicit discharges to the MS4 (Table 3C), including spills reaching the MS4 with associated permit-required information (see also Appendix A when applicable); and
- ✓ Determination of BMP effectiveness and necessary changes (Table 3D).

Table 3C. Summary of illicit discharges occurring during the reporting period.

One or more instances of illicit discharge or spill that reached the storm sewer during the reporting period:		☐Yes (If yes, list below) ☑No	
List of any instance of illicit discharge or spill that reached the MS4:			
No.	Description of Instance and Method Discovered [1,2]	Location & Source	Date (Observed and/or Reported)
-	N/A - No instances	-	-
-	N/A - No instances	-	-
-	N/A - No instances	-	-
-	N/A - No instances	-	-
-	N/A - No instances	-	-

[1] Method refers to if discovered by the permittee during dry weather screening, reported by the public, or other method. See also Appendix A, when applicable, for additional information.

Table 3D. BMP effectiveness evaluation based on resolution of illicit discharge and spill instances.

Each instance listed in Table 3C was resolved.[2]	☐Yes ☐No (If no, see below) ☑N/A
If "No" answered above, described reason and necessary changes and rationale:	
N/A. No instances. BMP effective due to prohibition of illicit discharge and methods in place to educate the public, report illicit discharge, screen for illicit discharge, and procedures to prevent illicit discharges.	

[2] See Appendix A for completed "Illicit Discharge Investigation Forms," when applicable, for each instance described. The forms include information required for each instance, including resolution, follow-up actions and date closed.

BMP 3C: Maintain, Implement and Enforce IDDE Written Procedures

For the reporting year, annual reporting associated with this BMP requires:

- ✓ The total number of outfalls and observation points (POIs) screened during the reporting period as part of the dry weather screening program (Table 3E); and
- ✓ Determination of BMP effectiveness and necessary changes (Table 3F).

Table 3E. Dry weather outfalls screening summary.

Total number of outfalls and POIs screened as part of dry weather screening program:	11
Total number of MS4 outfalls:	11

Table 3F. BMP effectiveness evaluation based on percentage of outfalls screened.

100% of outfalls were screened during the reporting period:	☑Yes ☐No (If no, see below)
If "No" answered above, described reason and necessary changes and rationale:	
N/A. All outfalls screened with no findings of suspected or obvious illicit discharge. BMP effective.	

Minimum Control Measure 4: Construction Site Stormwater Runoff and Erosion and Sediment Control

BMP 4A: Address Discharge from Regulated Construction Site Stormwater Runoff

For the reporting year, annual reporting associated with this BMP requires:

- ✓ A confirmation statement that land disturbing projects that occurred during the reporting period have been conducted in accordance with the current department approved annual standards and specifications for erosion and sediment control (Table 4A);
- ✓ Total number of erosion and sediment control inspections conducted and total number of each type of compliance action and enforcement action implemented (Table 4B);
- ✓ Determination of BMP effectiveness and necessary changes (Table 4C).

Table 4A. Implementation of standards and specifications for erosion and sediment control.

Confirmation Statement: Implementation of standards and specifications for ESC	
"In accordance with the General Permit and Program Plan, VHCC *confirms, as part of this annual report, that land disturbing projects that occurred during the reporting period have been conducted in accordance with the current department approved annual standards and specifications for erosion and sediment control, or no applicable projects occurred."*	
The confirmation statement above is correct:	☑Yes ☐No (If no, necessary actions below)

Table 4B. ESC inspections and compliance actions.

Total number of erosion and sediment control inspections conducted:					N/A
Total number of compliance action and enforcement action implemented:					
Warning(s):	-	Notice(s) of Violation:	-	Stop Work Order(s):	-

Table 4C. BMP effectiveness evaluation based on success of implementation of ESC controls.

Instance(s) of illicit discharge of sediment occurred from construction activities during the reporting period:	☐Yes (If no, see below) ☑No
If "Yes" answered above, described reason and necessary changes and rationale:	
N/A. No land disturbance projects occurred during the reporting period. BMP considered effective since DEQ-approved VCCS Standards and Specifications in place for erosion and sediment control.	

Minimum Control Measure 5: Post-construction SWM for Development

BMP 5A: Address Post-construction Stormwater Management (SWM)

For the reporting year, annual reporting associated with this BMP per the program plan requires:

- ✓ A confirmation statement that land disturbing projects that occurred during the reporting period have been conducted in accordance with the current department approved annual standards and specifications for stormwater management (Table 5A); and
- ✓ Determination of BMP effectiveness and necessary changes (Table 5B).

Table 5A. Implementation of standards and specifications for stormwater management.

Confirmation Statement: Implementation of standards and specifications for SWM	
"In accordance with the General Permit and Program Plan, VHCC *confirms, as part of this annual report, that any land disturbing projects that occurred during the reporting period have been conducted in accordance with the current department approved annual standards and specifications for stormwater management. Otherwise, no land disturbing projects project occurred."*	
The confirmation statement above is correct:	☑Yes ☐No (If no, necessary actions below)

Table 5B. BMP effectiveness evaluation based on success of implementation of DEQ-approved VCCS standards and specifications associated with SWM for the reporting period.

All applicable land disturbance activities that commenced work have an approved SWM plan:	☐Yes ☐No ☑N/A
All completed applicable land disturbance activities have a VCCS-approved SWM record drawing:	☐Yes ☐No ☑N/A
All applicable land disturbance activities include a long-term SWM inspection and maintenance plan:	☐Yes ☐No ☑N/A
If "No" answered above, described reason and necessary changes and rationale:	
N/A. No land disturbance projects occurred during the reporting period. BMP considered effective since DEQ-approved VCCS Standards and Specifications in place for stormwater management.	

BMP 5B: Implement Inspection and Maintenance Program for SWM Facilities

For the reporting year, annual reporting associated with this BMP requires:

- ✓ Total number of inspections conducted on stormwater management (SWM) facilities owned or operated by the permittee (Table 5C);
- ✓ A description of the significant maintenance, repair, or retrofit activities performed on the SWM facilities owned or operated by the permittee to ensure design performance (Table 5C); and
- ✓ Determination of BMP effectiveness and necessary changes (Table 5D).

Table 5C. Stormwater management facility inspections and maintenance for the reporting period.

Total number of inspections conducted on stormwater management facilities owned or operated by the permittee:	5
Total number of stormwater management facilities owned or operated by the permittee:	5
Description of the significant maintenance, repair, or retrofit activities performed on the SWM facilities owned or operated by the permittee *(Listed per BMP ID as shown on MS4 mapping)*:	
No significant maintenance, repair or retrofit activities occurred during the reporting period.	

Table 5D. BMP effectiveness evaluation based on 100% of stormwater management facilities inspected during the reporting year and timely maintenance performed, as applicable.

Per Table 5C, 100% of stormwater management were inspected during the reporting period:	☑Yes ☐No (If no, see below)
All maintenance needs identified from inspections performed within timeframes per a written maintenance schedule:	☑Yes ☐No (If no, see below)
If "No" answered above, described reason and necessary changes and rationale:	
NA. All BMPs inspected and no needs for significant maintenance. BMP effective due to continued inspections to identify maintenance needs.	

BMP 5C: Stormwater Management Facility Reporting to DEQ

For the reporting year, annual reporting associated with this BMP requires:

- ✓ Confirmation statements (Tables 5E and 5F) that the permittee electronically reported using the DEQ BMP Warehouse:
  - Stormwater management facilities in accordance with Part III B 1 and 2 of the Permit; and
  - Latest inspection date for each facility in accordance with Part III B 4 of the Permit.
- ✓ Determination of BMP effectiveness and necessary changes (Table 5G).

Table 5E. Stormwater management facility reporting using the DEQ BMP Warehouse.

Confirmation Statement: Reporting of SWM Facilities to the BMP Warehouse	
"In accordance with the General Permit and Program Plan, VHCC *confirms, as part of this annual report, that stormwater management facilities installed during the reporting period to control post-development stormwater runoff, or otherwise not previously reported, were reported using the DEQ BMP Warehouse. The stormwater management facilities reported are consistent with the requirements of Part III B1 and B2 of the MS4 General Permit."*	
The confirmation statement above is correct:	☑Yes ☐No (If no, see Table 5G)

Table 5F. Stormwater management facility inspection reporting using the DEQ BMP Warehouse.

Confirmation Statement: Reporting of SWM Facilities Inspections to the BMP Warehouse	
"In accordance with the General Permit and Program Plan, VHCC *confirms, as part of this annual report, that the most recent date for all stormwater management facility inspections was reported using the DEQ BMP Warehouse for in accordance with Part III B4 of the permit."*	
The confirmation statement above is correct:	☑Yes ☐No (If no, see Table 5G)

Table 5G. BMP effectiveness evaluation based on implementation of required reporting.

Both certification statements above are correct, with reporting implemented prior to submission of this annual report:	☑Yes ☐No (If no, see below)
If "No" answered above, described reason and necessary changes and rationale:	
N/A. All BMPs and latest BMP inspection dates reported to the BMP warehouse.	

Minimum Control Measure 6: Pollution Prevention & Good Housekeeping

BMP 6A: Written Procedures for Good Housekeeping and Pollution Prevention

For the reporting year, annual reporting associated with this BMP per the program plan requires:

- ✓ A summary of any written procedures developed or modified in accordance with Part I E 6 a and b during the reporting period (Table 6A);
- ✓ Determination of BMP effectiveness and necessary changes (Table 5B).

Table 6A. A summary of written good housekeeping procedures developed or modified.

Written procedures have been developed in accordance with Part I E 6 a and b of the MS4 General Permit.	☑Yes (If yes, see below) ☐No
If "Yes" answered above, a summary of the written procedures:	
The VHCC Staff Handbook of Good Housekeeping and Pollution Prevention (Handbook) includes written procedures for activities on campus that could impact stormwater quality. The Handbook defines illicit discharge and provides best practices for activities and waste disposal.	
Modifications to the good housekeeping written procedures occurred during the reporting period:	☐Yes (If yes, see below) ☑No
If "Yes" answered above, a summary of the modifications to the written procedures:	
The latest version is available on the webpage described in BMP 2A reporting.	

Table 6B. BMP effectiveness evaluation based on ability to achieve intended objectives described in in Part I E 6 a and b of the MS4 General Permit for the reporting period.

One or more instance of illicit discharge(s) originated from campus operation and maintenance activities:	☐Yes (If yes, see below) ☑No
One or more instance of illicit discharge(s) originated from mishandling of waste by college staff or contractor:	☐Yes (If yes, see below) ☑No
One or more instance of illicit discharge(s) originated from waste or wash water by a college staff or contractor activity:	☐Yes (If yes, see below) ☑No
If "Yes" answered above, described reason and necessary changes and rationale:	
N/A. No instance of illicit discharge from campus activities during the reporting period. BMP effective.	

BMP 6B: SWPPPs for High Priority / High Potential Facilities for Discharging Pollutants

For the reporting year, annual reporting associated with this BMP requires:

- ✓ A confirmation statement that high-priority facilities were reviewed to determine if a stormwater pollution prevention plan (SWPPP) coverage is needed during the reporting period (Table 6C);
- ✓ A list of new SWPPPs developed, modified and delisted (Table 6D); and
- ✓ Determination of BMP effectiveness and necessary changes (Table 6E).

Table 6C. Review to determine if SWPPP(s) are required per the permit.

Confirmation Statement: Campus SWPPP Assessment Determination	
"In accordance with the General Permit and Program Plan, VHCC *confirms, as part of this annual report, that regulated areas were evaluated during the reporting period to determine if any high priority facilities are present and required to have coverage under a SWPPP."*	
The confirmation statement above is correct:	☑Yes ☐No (If no, see Table 6E)

Table 6D. SWPPP summary for the reporting period.

Annual evaluation identified facilities requiring a SWPPP:	☐Yes (If yes, see below) ☑No
List of new SWPPPs developed in accordance with Part I E 6 I of the MS4 General Permit:	
N/A - No campus facilities require a SWPPP.	
Summary of SWPPP modifications in accordance with Part I E 6 j, 6 l, or 6 m of the General Permit:	
N/A - No SWPPP required.	
A facility was delisted from requiring a SWPPP:	☐Yes (If yes, see below) ☑No
Rationale for delisting a facility in accordance with Part I E 6 l or m of the General Permit:	
N/A - No SWPPPs required.	

Table 6E. BMP effectiveness evaluation based on SWPPP evaluation and development.

Annual SWPPP evaluations performed and SWPPP(s) developed, where applicable:	☑Yes ☐No (If no, see below)
If "No" answered above, described reason and necessary changes and rationale:	
N/A. Evaluation confirmed no SWPPP required after two immediate minor actions taken to cover waste receptacles.	

BMP 6C: Maintain Implement Nutrient Management Plan

For the reporting year, annual reporting associated with this BMP requires:

- ✓ The status of each nutrient management plan as of June 30 of the reporting year (Table 6F); and
- ✓ Determination of BMP effectiveness and necessary changes (Table 6G).

Table 6F. Nutrient Management Plan status for the reporting period.

Nutrients were applied within the regulated area:	☐Yes ☑No
If yes above, a current nutrient management plan is implemented:	☑Yes ☐No (If no, see below)
If nutrients applied and a nutrient management plan is *not* current, explained as follows:	
VHCC does not apply nutrients and thus does not need, nor maintain, a nutrient management plan.	
Date of nutrient management plan approval:	N/A
Date of nutrient management plan expiration:	N/A

Table 6G. BMP effectiveness evaluation based on current nutrient management plan, when applicable.

A current nutrient management plan is maintained *or* no nutrients were applied during the reporting period:	☑Yes ☐No (If no, see below)
If "No" answered above, described reason and necessary changes and rationale:	
VHCC does not apply nutrients and thus does not need, nor maintain, a nutrient management plan.	

BMP 6D: Contractor Requirements to Utilize Controls to Minimize Pollutant Discharges

No annual reporting requirements for this BMP.

BMP 6E: Training Plan for Applicable Employees

For the reporting year, annual reporting associated with this BMP requires:

- ✓ A list of the training activities (Table 6H) conducted, including the following information:
  - The completion date for the training activity;
  - The number of employees who completed the training activity; and
  - The objectives and good housekeeping procedures covered by the training activity.
- ✓ Determination of BMP effectiveness and necessary changes (Table 6I).

Table 6H. Good housekeeping / pollution prevention training plan implementation summary.

List of latest training activities conducted in accordance with Part I E 6 d of the General Permit:	
Training consisted of a PowerPoint presentation given by a professional engineering consultant to applicable staff. A quiz was taken by attendees after the training as a measure of effectiveness.	
Completion date of the latest training activity provided to applicable employees:	9/30/25
Number of employees who completed the training activity:	5
Objectives and good housekeeping procedures covered by the latest training activity.	
The presentation provided information for recognition of illicit discharges, pollution prevention practices, local impaired waterways and spill response. The training is focused on the VHCC Staff Handbook of Good Housekeeping and Pollution Prevention described in BMP 6A.	
Completion date of the previous training activity provided to applicable employees:	9/12/23

Table 6I. BMP effectiveness evaluation based on training frequency and quiz scores.

Latest training within 24 months of previous training:	☐Yes ☑No (If no, see below)
If "No" answered above, described reason and necessary changes and rationale:	
Biennial training exceeded 24-months by approximately 2 weeks. Moving forward, VHCC will ensure scheduling allows for subsequent training within the 24-month period from the previous training.	
Average quiz score from latest training:	75%
Average quiz score from previous training:	82%
Average quiz score ≥ 75% without significant (≥ 10%) drop from average score from previous training:	☑Yes ☐No (If no, see below)
If "No" answered above, described reason and necessary changes and rationale:	
N/A. Scores are satisfactory, demonstrating effective training. Quiz and results available upon request.	