

Virginia Phase II (Small)
Municipal Separate Storm
Sewer Systems (MS4)
General Permit No.
VAR040127

Arlington Public Schools Small MS4 Program Plan



2018-2023 Permit Cycle
Updated December 2021

Contents

Introduction	2
I. Municipal Separate Storm Sewer System Management Program - Minimum Control Measures (MCM).....	3
A. Public Education and Outreach on Stormwater Impacts (MCM 1)	3
B. Public Involvement/Participation (MCM 2)	6
C. Illicit Discharge Detection and Elimination (MCM 3).....	8
D. Construction Site Stormwater Runoff Control (MCM 4)	10
E. Post-Construction Stormwater Management: Operator-Owned Stormwater Management Inspection Procedures (MCM 5).. Error! Bookmark not defined.	
F. Pollution Prevention/Good Housekeeping For Municipal Operations (MCM 6).....	Error! Bookmark not defined.
II. TMDL Special Conditions.....	22
A. Chesapeake Bay TMDL Special Condition.....	22
B. Local TMDL Special Condition	23
Appendix A – List of Responsible Department Names and Acronyms	24
Appendix B – Memorandum for Agreement – Roles and Responsibilities of Arlington County and Arlington Public Schools for MS4 Permit Compliance	Error! Bookmark not defined.
Appendix C – Standard Operation Procedures for Stormwater Facility Inspection and Maintenance.....	Error! Bookmark not defined.
Appendix D – APEX Contract for Third Party Inspection, Operation, and Maintenance of APS Stormwater Management Facilities.....	32

Introduction

This Phase II (Small) Municipal Separate Storm Sewer System (MS4) Program Plan is maintained by Arlington Public Schools (APS) in full compliance with its General Virginia Pollutant Discharge Elimination System (VPDES) Permit (VAR040127) for Discharges of Stormwater, issued November 1, 2018 by the Virginia Department of Environmental Quality (DEQ).

The MS4 Program Plan requirements of the General VPDES Permit, implemented as described in this plan, have been determined to reduce the discharge of pollutants to the “maximum extent practicable” (MEP) for a Small MS4 Permit holder.

Permit Requirement	BMP Name and Description	Responsible Party	Measurable Goal & Schedule	MS4 Annual Reporting Requirements
I. Municipal Separate Storm Sewer System Management Program – Minimum Control Measures (MCM)				
A. Public Education and Outreach on Stormwater Impacts (MCM 1)				
(1) Identify high-priority stormwater issues to be communicated to the public as part of the public education and outreach program.	<p>APS has identified its three (3) high-priority stormwater issues to be: (1) using techniques that keep water onsite and/or reduce imperviousness; (2) litter prevention; and (3) the importance of native plants for preventing soil erosion. APS feels these three high-priority areas lend themselves well to an educational environment and relate to our public audience. Our education and outreach program targets these three areas.</p>	APS/F&O APS/Teaching and Learning	<p>Identify high-priority stormwater issues.</p> <p>Complete.</p>	A list of the high-priority stormwater issues addressed in the public education and outreach program.
(2) Identify rationale for selection of each high-priority stormwater issue and an explanation of how each education or outreach strategy is intended to have a positive impact on stormwater discharges.	<p>Rationale for selection of high-priority stormwater issues:</p> <ul style="list-style-type: none"> • Using techniques that keep water onsite and/or reduce imperviousness: reduces the transport or load of stormwater pollutants discharged from the MS4. • Litter prevention: prevents trash, debris, and associated pollutants from being collected by stormwater and entering waterways. • Importance of native plants for preventing soil erosion: helps control runoff of sediment and nutrients. <p>Education and outreach strategy impacts on stormwater discharges:</p> <ul style="list-style-type: none"> • Green Scene: APS-produced outreach program that highlights sustainability efforts in the school district. • Wetlands Learning Lab: Swampy area of schoolyard converted into a Wetlands Learning Lab to promote hands-on, inquiry-based education. • Outdoor Lab: 210-acre property in Fauquier County leased by APS as an outdoor science laboratory during the academic year and as an environmental education camp for three weeks each summer. • Native Habitats and Outdoor Learning Environments: Outdoor gardens or outdoor learning environments that include native plant species as part of teaching and learning curriculum at various schools. 	APS/F&O APS/Teaching and Learning	<p>Identify rationale for stormwater issues and explanation of outreach strategies.</p> <p>Complete.</p>	None.

Permit Requirement	BMP Name and Description	Responsible Party	Measurable Goal & Schedule	MS4 Annual Reporting Requirements
I. Municipal Separate Storm Sewer System Management Program – Minimum Control Measures (MCM)				
A. Public Education and Outreach on Stormwater Impacts (MCM 1) (continued)				
	<ul style="list-style-type: none"> • NOAA Chesapeake B-WET Program: Goal is to provide all high school biology students with a comprehensive understanding of how stormwater runoff affects the local watersheds and to assist students in developing solutions through project-based learning. • Meaningful Watershed Education Experience (MWEE): Integrates field work in the Chesapeake Bay watershed with multidisciplinary classroom activities and instruction. • Sustainability Liaisons: School-based stipend positions that support and coordinate sustainability efforts and support stormwater initiatives at schools. • Environmental Literacy: APS participates in Virginia Department of Education environmental literacy goals intended to establish a strong and targeted environmental education program for K-12 students. • Social Media: Staff use APS-run social media accounts to highlight environmental activities and topics. 			
(3) Identify the public audience to receive each high-priority stormwater message.	APS has identified its public audience to be its students and staff in the school district. Staff includes APS teachers, administrators, trades, transportation, and custodial personnel.	APS/F&O APS/Teaching and Learning	Identify public audience. Complete.	None.
(4) Develop strategies to communicate each high-priority stormwater message. Confirm that two or more strategies identified in MS4 Permit, Part I E 1 d, Table 1, have been used.	APS develops relevant messages and associated educational and outreach materials for the public based upon on-going curriculum in the Meaningful Watershed Educational Experience Program, Arlington County's Stormwater Pollution Prevention Plan (SWPPP) training program, and the Arlington Outdoor Education Association's Outdoor Lab. The public education and outreach program includes no fewer than three strategies identified in Table 1 of the MS4 Permit: media materials, curriculum materials, and training materials.	APS/F&O APS/Teaching and Learning	Communicate messages to the public during these programs, which are conducted annually.	A list of the strategies used to communicate each high-priority stormwater issue.

Permit Requirement	BMP Name and Description	Responsible Party	Measurable Goal & Schedule	MS4 Annual Reporting Requirements
I. Municipal Separate Storm Sewer System Management Program – Minimum Control Measures (MCM)				
A. Public Education and Outreach on Stormwater Impacts (MCM 1) (continued)				
	For more information, refer to the MS4 Annual Reports located on our website at APS Website for Stormwater Program Documents .			
(5) Identify the anticipated time periods the messages will be communicated or made available to the public.	All outreach programs identified above are communicated or made available to the public at least annually, with multiple programs running several times per year. For instance, Green Scene messages are broadcasted several times per week throughout the year, and education initiatives (e.g., MWEE, Wetlands Learning Lab) are integrated into the curriculum throughout the school year.	APS/F&O APS/Teaching and Learning	Identify when messages are available to public. Complete.	None.

Permit Requirement	BMP Name and Description	Responsible Party	Measurable Goal & Schedule	MS4 Annual Reporting Requirements
I. Municipal Separate Storm Sewer System Management Program – Minimum Control Measures (MCM) (continued)				
B. Public Involvement/Participation (MCM 2)				
(1) Maintain an updated Small MS4 Program Plan and post copies of the plan on permittee's webpage.	APS' updated Small MS4 Program Plan is located on our website at APS Website for Stormwater Program Documents .	APS/F&O APS/Teaching and Learning	Update the MS4 Program Plan within six months after the effective date of the 2018-2023 MS4 Permit. Post the most up-to-date version of MS4 Program Plan on the permittee's website within 30 days of updating the MS4 Program Plan.	Include the webpage address to the permittee's MS4 Program Plan and stormwater website.
(2) Post copies of each annual report on the permittee's webpage.	APS' stormwater program documents, including MS4 Annual Reports, are located on our website at APS Website for Stormwater Program Documents .	APS/F&O	Post on webpage no later than 30 days after submittal to DEQ. Retain the copies of annual reports online for the duration of permit coverage.	A webpage address to the permittee's MS4 program and stormwater website.

Permit Requirement	BMP Name and Description	Responsible Party	Measurable Goal & Schedule	MS4 Annual Reporting Requirements
I. Municipal Separate Storm Sewer System Management Program – Minimum Control Measures (MCM) (continued)				
B. Public Involvement/Participation (MCM 2) (continued)				
(3) Maintain a webpage with mechanisms for the public to report potential illicit discharges, complaints, or other stormwater pollution concerns.	<p>The APS stormwater program webpage directs members of the public to where they can report:</p> <ul style="list-style-type: none"> • potential illicit discharges, improper disposal, or spills to the MS4; • complaints regarding land disturbing activities; or • other potential stormwater pollution concerns. <p>The website is maintained by Arlington County Government (ACG) and can be accessed at ACG Website for Public to Report Stormwater Pollution Concerns.</p>	APS/F&O	Within three months after the 2018-2023 MS4 permit's effective date.	<p>Summary of any reports received from the public and how the permittee responded.</p> <p>A webpage address to the permittee's MS4 program and stormwater website.</p>
(4) Maintain a webpage that contains the methods for how the public can provide input on the permittee's MS4 Program.	The APS stormwater program webpage directs viewers to contact stormwater@apsva.us to provide input on the APS Stormwater Program.	APS/F&O	<p>Include on webpage how the public can provide input to MS4 Program.</p> <p>Complete.</p>	Summary of any public input on the MS4 Program received and how the permittee responded.
(5) Implement no less than four activities per year to provide an opportunity for public involvement to improve water quality and support local restoration and clean-up projects. Include a description of the activities, anticipated time period the activities will occur, and a metric for each activity to determine if the activity is beneficial to water quality.	Our public audience participates in at least four (4) public outreach activities related to our three (3) high-priority water quality issues each year. See Section I(A)(2) of this MS4 Program Plan for a list and description of the activities and Section I(A)(5) of this MS4 Program Plan for an explanation regarding estimated time period. The metric for all activities is the number of participants for each activity.	APS/F&O APS/Teaching and Learning	Implement four activities annually.	<p>Description of the public involvement activities.</p> <p>A report of the metric as defined for each activity and an evaluation as to whether or not the activity is beneficial to improving water quality.</p> <p>The name of other MS4 permittees with whom the permittee collaborated in the public involvement opportunities, if any.</p>

Permit Requirement	BMP Name and Description	Responsible Party	Measurable Goal & Schedule	MS4 Annual Reporting Requirements
I. Municipal Separate Storm Sewer System Management Program – Minimum Control Measures (MCM) (continued)				
C. Illicit Discharge Detection and Elimination (MCM 3)				
(1) Maintain an accurate storm sewer system map and information table.	Storm sewer mapping and information table are incorporated into ACG's storm drainage GIS database. Each year, infrastructure associated with newly constructed schools and school additions shall be included in the GIS as appropriate. Support provided by ACG to APS in meeting this requirement is documented in the <i>Memorandum for Agreement – Roles and Responsibilities of Arlington County and Arlington Public Schools for MS4 Permit Compliance</i> , which can be found in Appendix B of this MS4 Program Plan.	APS/F&O Coordination with ACG/DES	Submit to DEQ a GIS-compatible shapefile or PDF of the MS4 map no later than July 1, 2019. Update storm sewer map and information table with any changes to the MS4 by June 30 of the reporting year.	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.
(2) Provide written notification to downstream MS4 of known physical interconnection.	APS shall notify downstream MS4s of newly discovered physical interconnections and maintain a copy of those correspondences in the corresponding annual report. Notification of physical interconnection with ACG can be found in Appendix B of the 2015 Annual Report. APS has also received notification of potential upstream interconnections. VDOT contacted APS to notify of potential known interconnection between VDOT's stormwater systems and the stormwater systems APS operates. Notification was sent to APS on April 24, 2015.	APS/F&O	Provide written notification of interconnections as they are discovered.	Copies of written notifications of new physical interconnections to other MS4s (or by reference).
(3) Prohibit non-stormwater discharges into the storm sewer.	APS follows the ACG ordinance (County Code Chapter 26-5b) that prohibits unauthorized discharges into the storm sewer system. See Appendix B of this MS4 Program Plan for the memorandum of agreement (MOA) between APS and ACG.	APS/F&O Coordination with ACG/DES	Complete.	None.

Permit Requirement	BMP Name and Description	Responsible Party	Measurable Goal & Schedule	MS4 Annual Reporting Requirements
I. Municipal Separate Storm Sewer System Management Program – Minimum Control Measures (MCM) (continued)				
C. Illicit Discharge Detection and Elimination (MCM 3) (continued)				
<p>(4) Maintain, implement, and enforce IDDE written procedures designed to detect, identify, and address unauthorized non-stormwater discharges, including illegal dumping, to the Small MS4 to effectively eliminate the unauthorized discharge.</p>	<p>Illicit Discharge Detection and Elimination (IDDE) procedures are detailed in the Arlington Public Schools Illicit Discharge Detection and Elimination Program Plan, which is available on the APS Website for Stormwater Program Documents.</p> <p>APS has developed a mechanism to eliminate illicit discharges to include multiple steps:</p> <p>(1) Field inspections and outfall screening, (2) Immediate track down by IDDE field team during the inspection, followed by, (3) Source elimination by APS Facility staff, and if necessary, (4) Coordinating with ACG for technical assistance and any necessary enforcement action.</p> <p>See Appendix B of this MS4 Program Plan for the MOA between ACG and APS.</p>	<p>APS/F&O</p>	<p>Complete.</p>	<p>The total number of outfalls screened during the reporting period.</p> <p>A list of illicit discharges to the MS4, including:</p> <p>(a) Source of illicit discharge;</p> <p>(b) Date(s) the discharge was observed, reported, or both;</p> <p>(c) Whether the discharge was discovered during dry weather screening, reported by the public, or other method (describe);</p> <p>(d) How the investigation was resolved;</p> <p>(e) A description of any follow-up activities; and</p> <p>(f) The date the investigation was closed.</p>

Permit Requirement	BMP Name and Description	Responsible Party	Measurable Goal & Schedule	MS4 Annual Reporting Requirements
I. Municipal Separate Storm Sewer System Management Program – Minimum Control Measures (MCM) (continued)				
D. Construction Site Stormwater Runoff Control (MCM 4)				
(1) Describe legal authorities, such as ordinances, permits, orders, specific contract language, and interjurisdictional agreements, utilized to address discharges entering the MS4 from regulated construction site stormwater runoff.	<p>The following is a relevant legal authority maintained by APS:</p> <p>Construction Contract Language – APS has standard contract language requiring DEQ Erosion and Sediment Control (E&SC), Stormwater Management (SWM) inspector, and Registered Land Disturber (RLD) certification; proper record keeping of the SWPPP; inspections of the site at least every four (4) days; and compliance with APS' MS4 Permit.</p> <p>APS also complies with the following ACG legal authorities related to construction site runoff control:</p> <ul style="list-style-type: none"> • ACG Plan Review Procedures • Chesapeake Bay Preservation Ordinance • Compliance Inspection Procedures • Erosion and Sediment Control Ordinance • Stormwater Management Ordinance <p>See Appendix B of this MS4 Program Plan for the MOA between ACG and APS.</p>	ACG/DES APS/D&C	Complete.	None.
(2) Written inspection procedures to ensure erosion and sediment controls are properly implemented. Identify all associated documents utilized during inspection, including the inspection schedule.	<p>Since APS is a subdivision of a local government (school board), the MS4 Permit requires the inspection of projects resulting in a land disturbance of 10,000 square feet or greater, 2,500 square feet or greater in accordance with areas designated under the Chesapeake Bay Preservation Act, or in accordance with more stringent thresholds established by the local government.</p> <p>ACG is the regulatory authority for construction activity on APS property. ACG performs all formal inspections pertaining to MCM 4.</p> <p>ACG provides enforcement of construction site stormwater runoff control in conformance with state standards. ACG's compliance and enforcement procedures and all associated documents may be found online at ACG Plan Review Procedures.</p>	ACG/DES	<p>ACG will inspect applicable projects:</p> <p>(a) During or immediately following initial installation of erosion and sediment controls;</p> <p>(b) At least once per every two-week period;</p> <p>(c) Within 48 hours following any</p>	Total number of inspections and enforcement actions performed by ACG on APS properties.

Permit Requirement	BMP Name and Description	Responsible Party	Measurable Goal & Schedule	MS4 Annual Reporting Requirements
I. Municipal Separate Storm Sewer System Management Program – Minimum Control Measures (MCM) (continued)				
D. Construction Site Stormwater Runoff Control (MCM 4) (continued)				
	See Appendix B of this MS4 Program Plan for the MOA between ACG and APS.		runoff-producing storm event; and (d) at the completion of the project prior to the release of any performance bond.	
(3) Written procedures for requiring compliance through corrective action or enforcement action.	<p>ACG provides enforcement of construction site stormwater runoff control in conformance with state standards. ACG's compliance and enforcement procedures and all associated documents may be found online at ACG Plan Review Procedures.</p> <p>See Appendix B of this MS4 Program Plan for the MOA between ACG and APS.</p>	ACG/DES APS/D&C	Complete.	None.
(4) Identify roles and responsibilities in implementing the construction site stormwater runoff control requirements.	<p>APS' Design and Construction Department is responsible for providing an owner's representative for ensuring compliance with County plan review, inspections, and enforcement activities.</p> <p>APS requires in its contract language that construction firms provide an onsite construction manager certified as a Stormwater and Erosion & Sediment Control Inspector to ensure compliance with County ordinances.</p> <p>ACG is the regulatory authority for construction activity on APS property. ACG performs all plan reviews, formal inspections, and enforcement actions pertaining to MCM 4.</p> <p>See Appendix B of this MS4 Program Plan for the MOA between ACG and APS.</p>	ACG/DES APS/D&C	Complete.	<p>Confirmation statement that land-disturbing projects that occurred during the reporting period have been conducted in accordance with approved standards and specifications for erosion and sediment control.</p> <p>If one or more of the land-disturbing projects were not conducted with the department approved standards and specifications, an explanation as to why</p>

Permit Requirement	BMP Name and Description	Responsible Party	Measurable Goal & Schedule	MS4 Annual Reporting Requirements
I. Municipal Separate Storm Sewer System Management Program – Minimum Control Measures (MCM) (continued)				
D. Construction Site Stormwater Runoff Control (MCM 4) (continued)				
				the projects did not conform to the approved standards and specifications.

Permit Requirement	BMP Name and Description	Responsible Party	Measurable Goal & Schedule	MS4 Annual Reporting Requirements
I. Municipal Separate Storm Sewer System Management Program – Minimum Control Measures (MCM) (continued)				
E. Post-Construction Stormwater Management: Operator-Owned Stormwater Management Inspection Procedures (MCM 5)				
(1) Describe legal authorities, such as ordinances, permits, orders, specific contract language, and interjurisdictional agreements, utilized to address post-construction stormwater runoff control.	<p>APS is the sole owner of stormwater management facilities on APS properties and the sole legal authority assuring compliance with MCM 5. Mechanisms which help ensure compliance with this MCM include:</p> <ul style="list-style-type: none"> • Service Contract with Third-Party Inspection and Maintenance Contractor <p>APS Standard Operating Procedures (SOPs) for Inspection and Maintenance. APS follows ACG Guidelines for Inspection and Maintenance of Stormwater Facilities at Stormwater Management Facility Inspections.</p>	APS/F&O	Update list in the MS4 Program Plan as additional legal authorities are developed, if any.	None.
(2) Develop and maintain written inspection and maintenance procedures of stormwater management facilities.	<p>ACG provides all final inspections for newly constructed stormwater facilities. APS follows the guidelines established by ACG for the inspection and maintenance of stormwater facilities, which may be found on the ACG website under Stormwater Management Facility Inspections. APS' SOPs for inspection and maintenance closely follow ACG's inspection checklist and may be found in Appendix C of this MS4 Program Plan. All inspection and maintenance reports are kept at APS' Department of Facilities and Operations (F&O). See Appendix B of this MS4 Program Plan for the MOA between ACG and APS.</p>	APS/F&O	Update inspection and maintenance procedures as needed.	None.
(3) Identify the roles and responsibilities in implementing the requirements of MCM 5.	<p>APS's Department of Facilities and Operations is responsible for ensuring overall implementation of this MCM.</p> <p>APS contracts with a third party for inspection, operation, and maintenance of all its stormwater management facilities. A copy of the contract agreement with this third party is included in Appendix D of this MS4 Program Plan.</p> <p>ACG manages a master database containing all of APS' Best Management Practices (BMPs). APS and ACG collaborate closely to make sure this database is up to date. See Appendix B of this MS4 Program Plan for the MOA between ACG and APS.</p>	APS/F&O	Update roles and responsibilities in the MS4 Program Plan as there are changes, if any.	None.

Permit Requirement	BMP Name and Description	Responsible Party	Measurable Goal & Schedule	MS4 Annual Reporting Requirements
I. Municipal Separate Storm Sewer System Management Program – Minimum Control Measures (MCM) (continued)				
E. Post-Construction Stormwater Management: Operator-Owned Stormwater Management Inspection Procedures (MCM 5) (continued)				
	APS follows ACG guidelines for Inspection and Maintenance of Stormwater Facilities: Stormwater Management Facility Inspections.			
(4) Inspect stormwater management facilities no less than once per year.	<p>APS contracts with a third party for long-term operation and maintenance of all its stormwater management facilities. APS' third-party contractor conducts inspections annually on all stormwater management facilities. The contractor is required to schedule inspections in a timely fashion and ensures all facilities are functioning as originally designed via regular inspections and maintenance. See Appendix D of this MS4 Program Plan for the agreement with the third-party contractor.</p> <p>The most recent inspection dates are kept online as part of an electronic database maintained by ACG. APS is responsible for the accuracy of APS's stormwater facility information.</p>	APS/ Maintenance	Inspect stormwater management facilities annually.	Total number of inspections conducted on stormwater management facilities.
(5) Conduct the maintenance of stormwater management facilities.	If during the inspection it is determined that maintenance is required, the third-party contractor conducts maintenance in a timely manner, in accordance with written procedures developed as part of this MCM. APS's third-party contractor conducts maintenance at least annually on all APS stormwater management facilities. The contractor is required to schedule maintenance in a timely fashion and provides a detailed report afterwards that includes photo documentation of the stormwater facilities during inspection and after maintenance. All inspection reports and maintenance invoices are kept on file by APS' Department of Facilities and Operations.	APS/ Maintenance	Conduct maintenance of stormwater management facilities as needed.	Description of the significant maintenance, repair, or retrofit activities performed on the stormwater management facilities owned or operated by the permittee to ensure it continues to perform as designed.

Permit Requirement	BMP Name and Description	Responsible Party	Measurable Goal & Schedule	MS4 Annual Reporting Requirements
I. Municipal Separate Storm Sewer System Management Program – Minimum Control Measures (MCM) (continued)				
E. Post-Construction Stormwater Management: Operator-Owned Stormwater Management Inspection Procedures (MCM 5) (continued)				
(6) Maintain an electronic database or spreadsheet of all known permittee-owned or permittee-operated and privately owned stormwater management facilities that discharge into the MS4.	<p>ACG maintains the electronic database of all stormwater management facilities including APS' stormwater management facilities. APS is responsible for the accuracy of this information and works closely with ACG to ensure the database remains up to date. See Appendix B for the MOA between ACG and APS.</p> <p>New stormwater management facilities brought online or discovered during the reporting year are listed in the MS4 Annual Report located on our website at APS Website for Stormwater Program Documents.</p>	ACG/DES in coordination with APS/F&O	Spreadsheet updated no later than 30 days after a new stormwater management facility is brought online or an existing stormwater management facility is discovered.	None; however, the annual report captures all new stormwater management facilities brought online or discovered during the reporting year.
(7) Report post-construction runoff control BMPs in the DEQ Construction Stormwater Database.	APS or ACG will use the DEQ Construction Stormwater Database or other application as specified by the department to report each stormwater management facility installed after July 1, 2014 to address the control of post-construction runoff from land disturbing activities for which the permittee is required to obtain a General VPDES Permit for Discharges of Stormwater from Construction Activities (Construction General Permit).	ACG/DES in coordination with APS/F&O	Report stormwater management facilities through the DEQ Construction Stormwater Database as they are installed.	Confirmation statement that required stormwater management facility information was submitted through the Virginia Construction Stormwater General Permit database, or a statement that no projects requiring coverage under Construction General Permit were completed.
(8) Report applicable BMPs into the DEQ BMP Warehouse.	APS will electronically report the stormwater management facilities and BMPs implemented between July 1 and June 30 of each year using the DEQ BMP Warehouse and associated reporting template for any practices for which a General VPDES Permit for Discharges of Stormwater from Construction Activities was not required.	APS/F&O	Report BMPs implemented during the reporting period into the DEQ BMP Warehouse no later than October 1 of each year.	Confirmation statement that the permittee electronically reported BMPs using the DEQ BMP Warehouse in accordance with MCM 5 and the date on which the information was submitted.

Permit Requirement	BMP Name and Description	Responsible Party	Measurable Goal & Schedule	MS4 Annual Reporting Requirements
I. Municipal Separate Storm Sewer System Management Program – Minimum Control Measures (MCM) (continued)				
F. Pollution Prevention/Good Housekeeping For Municipal Operations (MCM 6)				
(1) Maintain and implement written procedures for pollution prevention and good housekeeping.	<p>The following Policy Implementation Procedures (PIPs) are in place at APS and incorporate the required Good Housekeeping procedures. These PIPs may be found online under our school board policies section for Support Services:</p> <p>(1) E-3.30 PIP-1 Housekeeping and Grounds Keeping</p> <p>(2) E-3.30 PIP-2 Trash and Recycling</p> <p>(3) E-3.31 PIP-3 Occupational Health, which requires that hazardous materials be identified and disposed of properly.</p> <p>(4) E-3.31 PIP-7 Environmental Compliance, which requires that hazardous waste material be identified and disposed of properly.</p>	APS/F&O in coordination with ACG/DES	Update written procedures as needed.	A summary of any operational procedures developed or modified in accordance with MCM 6 during the reporting period.
(2) Identify high-priority facilities with a high potential of discharging pollutants.	<p>APS operates one (1) high-priority municipal facility with a high potential of discharging pollutants: the APS Trades Facility located at the ACG Trades Center.</p> <p>The annual report identifies the APS Trades Facility as a municipal high-priority facility.</p>	APS/F&O	Identify high-priority facilities within 12 months after the effective date of the 2018-2023 MS4 Permit.	None.
(3) Maintain and implement a site-specific stormwater pollution prevention plan (SWPPP) for each facility identified.	<p>APS' Trades Facility is included in ACG's SWPPP for the Trades Center. APS is responsible for this facility under ACG's Trade Center SWPPP and inspects and maintains the area. In collaboration with ACG, APS participates in quarterly inspections of the Trades Facility as part of the ACG SWPPP. APS is responsible for any follow-up recommendations from these quarterly inspections. A copy of the SWPPP is maintained at the APS Trades Center.</p> <p>See Appendix B of this MS4 Program Plan for the MOA between ACG and APS.</p>	APS/F&O	Complete. Should another facility be identified in the future, APS will coordinate with ACG to develop a SWPPP no later than December 31 of the year in which the high-priority facility was identified.	<p>Summary of any new SWPPPs developed in accordance with MCM 6 during the reporting period.</p> <p>Summary of any SWPPPs modified, or the rationale of any high-priority facilities delisted, in accordance with MCM 6 during the reporting period.</p>

Permit Requirement	BMP Name and Description	Responsible Party	Measurable Goal & Schedule	MS4 Annual Reporting Requirements
I. Municipal Separate Storm Sewer System Management Program – Minimum Control Measures (MCM) (continued)				
F. Pollution Prevention/Good Housekeeping For Municipal Operations (MCM 6) (continued)				
(4) Review any high-priority facility owned or operated by the permittee for which a SWPPP has not been developed to determine if the facility has a high potential to discharge pollutants.	<p>APS does not currently own any additional high-priority facilities with a high potential of discharging pollutants. However, should any facilities be acquired or constructed, APS will conduct reviews to determine if the facility has a high potential to discharge pollutants.</p> <p>See Appendix B of this MS4 Program Plan for the MOA between ACG and APS.</p>	APS/F&O	N/A. Should another facility be acquired or constructed in the future, APS or ACG will conduct reviews annually, no later than June 30 of each year.	None.
(5) Develop a SWPPP meeting the requirements of this MCM for any newly identified facility with high potential to discharge pollutants.	<p>APS does not currently own any additional high-priority facilities with a high potential of discharging pollutants. However, should a facility be identified, APS will work with ACG so that a SWPPP is developed for the facility.</p> <p>See Appendix B of this MS4 Program Plan for the MOA between ACG and APS.</p>	APS/F&O	N/A. If applicable in the future, APS or ACG will develop a SWPPP no later than December 31 of the year in which the high-priority facility was identified.	Summary of any new SWPPPs developed in accordance with MCM 6 during the reporting period.
(6) Review SWPPP after unauthorized discharge, release, or spill reported.	<p>APS has not had any unauthorized discharge, release, or spill reported so has not yet conducted a SWPPP review. Should an unauthorized discharge, release, or spill occur, APS will work with ACG so that the SWPPP is reviewed to determine if additional measures are necessary to prevent future unauthorized discharges, releases, or spills.</p>	APS/F&O	Review SWPPP no later than 30 days after any unauthorized discharge, release, or spill.	None.
(7) Update SWPPP after unauthorized discharge, if necessary.	<p>APS has not had any unauthorized discharge, release, or spill reported so has not yet conducted a SWPPP review. Should an unauthorized discharge, release, or spill occur, APS will work with ACG so that the SWPPP is updated.</p>	APS/F&O	Update SWPPP no later than 90 days after the unauthorized discharge.	Summary of any SWPPPs modified in accordance with MCM 6 during the reporting period.
(8) SWPPP shall be kept at the high-priority facility and utilized as part of staff training required in this MCM.	<p>A copy of the SWPPP is maintained at the APS Trades Center and used as part of staff training required in MCM 6.</p>	APS/F&O	Keep SWPPP at facility as soon as SWPPP is developed.	None.

Permit Requirement	BMP Name and Description	Responsible Party	Measurable Goal & Schedule	MS4 Annual Reporting Requirements
I. Municipal Separate Storm Sewer System Management Program – Minimum Control Measures (MCM) (continued)				
F. Pollution Prevention/Good Housekeeping For Municipal Operations (MCM 6) (continued)				
(9) Maintain and implement turf and landscape nutrient management plans developed by a certified turf and landscape nutrient management planner where nutrients are applied to a contiguous area greater than one (1) acre.	<p>ACG uses a turf management contractor to manage all necessary pesticide, herbicide, and fertilizer applications for athletic fields. ACG uses this turf management contractor to maintain/apply nutrients to lands owned by APS. This contractor develops and implements the Nutrient Management Plans (NMPs) for APS lands with a contiguous area greater than one (1) acre.</p> <p>APS currently has twelve (12) locations that meet this criterion. ACG staff worked with their turf management contractor to develop and implement turf and landscape NMPs for all twelve (12) APS locations. NMPs have been developed and implemented for all locations. The most recent MS4 Annual Report identifies a list of lands for which NMPs are required, total acreage on which nutrients are applied, the date of the most recent NMP for each property, and location in which the NMPs are located. Refer to the MS4 Annual Report located on our website at APS Website for Stormwater Program Documents.</p>	ACG/DPR in coordination with APS/F&O	<p>Update NMPs prior to plan expiration dates.</p> <p>Develop new plans for any new area requiring an NMP.</p>	<p>Summary of turf and landscape NMPs developed that includes:</p> <p>(a) Location and the total acreage of each land area;</p> <p>(b) The date of the approved NMP; and</p> <p>(c) Location in which the individual NMPs are located.</p>
(10) Identify mechanisms that require that contractors engaging in activities with the potential to discharge pollutants use appropriate control measures to minimize the discharge of pollutants to the MS4.	Contractors are trained and/or certified as specified in Sections (11d), (11e), and (11f) below to ensure implementation of the necessary good housekeeping and pollution prevention procedures.	APS/F&O in coordination with ACG/DES	ACG will continue to ensure that contractors are trained and/or certified prior to their conducting work on behalf of APS.	None.

Permit Requirement	BMP Name and Description	Responsible Party	Measurable Goal & Schedule	MS4 Annual Reporting Requirements
I. Municipal Separate Storm Sewer System Management Program – Minimum Control Measures (MCM) (continued)				
F. Pollution Prevention/Good Housekeeping For Municipal Operations (MCM 6) (continued)				
(11) Develop a written training plan for applicable staff that meets the requirements of MCM 6 as listed in the 2018-2023 MS4 Permit.	Sections (11a) through (11g) that follow serve as the written training plan to meet this requirement.	APS/F&O in coordination with ACG/DES	Complete.	List of the training events conducted in accordance with MCM 6, including: (a) The date of the training event; (b) The number of employees who attended the training event; and (c) The objective of the training event.
(11a) Train field personnel in the recognition and reporting of illicit discharges.	ACG provides APS personnel annual training in recognition and reporting of illicit discharge in conjunction with ACG's training schedule. See Appendix B of this MS4 Program Plan for the MOA between ACG and APS.	APS/F&O in coordination with ACG/DES	Train field personnel no less than every 24 months. While not required, field personnel continue to be trained annually.	See (11) above.
(11b) Train employees performing road, street, and parking lot maintenance in pollution prevention and good housekeeping associated with those activities.	Good housekeeping and pollution prevention practices are employed during parking lot maintenance, and in and around APS facilities and in the field. Annual good housekeeping and pollution prevention training is provided to those APS staff. See Appendix B of this MS4 Program Plan for the MOA between ACG and APS.	APS/F&O in coordination with ACG/DES	Train aforementioned employees no less than every 24 months.	See (11) above.

Permit Requirement	BMP Name and Description	Responsible Party	Measurable Goal & Schedule	MS4 Annual Reporting Requirements
I. Municipal Separate Storm Sewer System Management Program – Minimum Control Measures (MCM) (continued)				
F. Pollution Prevention/Good Housekeeping For Municipal Operations (MCM 6) (continued)				
(11c) Ensure that employees working in and around maintenance, public works, or recreational facilities receive training in good housekeeping and pollution prevention practices associated with those facilities.	<p>APS custodial staff are employed around outdoor fields during the school days. Annual good housekeeping and pollution prevention training is provided to those APS custodial staff.</p> <p>See Appendix B of this MS4 Program Plan for the MOA between ACG and APS.</p>	APS/F&O in coordination with ACG/DES	Train aforementioned employees no less than every 24 months.	See (11) above.
(11d) Ensure that employees and contractors who apply pesticides and herbicides are trained or certified in accordance with the Virginia Pesticide Control Act (§ 3.2-3900 et seq. of the Code of Virginia).	<p>Arlington County Department of Parks and Recreation (DPR) hires a certified contractor who applies nutrients and pesticides on all County and School lands. ACG tracks the status of certifications as part of their MS4 permit obligation. Nutrient Management Plans for school properties are located at DPR and a copy is held at APS' Department of Facilities and Operations.</p> <p>See Appendix B of this MS4 Program Plan for the MOA between ACG and APS.</p>	APS/F&O in coordination with ACG/DES	Ensure employees and contractors are trained or certified prior to the application of pesticides and herbicides.	None.
(11e) Ensure that employees and contractors serving as plan reviewers, inspectors, program administrators, and construction site operators obtain the appropriate certifications.	<p>APS relies on ACG, as the local government regulatory authority, for permitting, inspection, and enforcement services related to erosion and sediment control. Additionally, APS has been requiring that construction firms provide an onsite construction manager (CM) to be certified as a Stormwater and Erosion & Sediment Control (E&SC) Inspector to ensure compliance with County ordinances. All certificates are verified as part of every contract. See (11f) below for contract language. Select APS in-house staff members, including construction management staff, are certified as stormwater inspectors, E&SC inspectors, and combined stormwater and E&SC program administrators. See Appendix B of this MS4 Program Plan for the MOA between ACG and APS.</p>	APS/F&O in coordination with ACG	ACG ensures that employees and contractors are certified prior to undertaking their associated duties.	None; however, the Annual Reports list APS in-house staff and construction management staff certified as stormwater inspectors, E&SC inspectors, and combined stormwater and E&SC program administrators.

Permit Requirement	BMP Name and Description	Responsible Party	Measurable Goal & Schedule	MS4 Annual Reporting Requirements
I. Municipal Separate Storm Sewer System Management Program – Minimum Control Measures (MCM) (continued)				
F. Pollution Prevention/Good Housekeeping For Municipal Operations (MCM 6) (continued)				
(11f) Ensure that employees and contractors implementing the stormwater program obtain the appropriate certifications as required under the Virginia Stormwater Management Act and its attendant regulations.	<p>APS ensures that employees and contractors are certified prior to implementing the stormwater program.</p> <p>APS requires proper certification for stormwater management oversight on construction sites in their bid documents. APS closely coordinates with ACG regarding proper oversight and control measures for stormwater discharges. The following language is used in our bid documents. See Appendix B of this MS4 Program Plan for the MOA between ACG and APS.</p> <p>ESC and SWM Certification. An onsite construction manager (CM) team member shall hold and maintain for the duration of the project the Virginia DEQ E&SC and SWM inspector certification. Per the certification, this member shall ensure proper record keeping of the SWPPP by the contractor, conduct self-inspections of the site at least every four (4) days, and ensure compliance with APS' MS4 Permit as it relates to construction site stormwater runoff control and proper E&SC. The CM shall also provide on-site personnel certified for and designated as the Registered Land Disturber (RLD).</p>	APS/F&O	APS ensures that employees and contractors are certified prior to implementing the stormwater program.	None.
(11g) Ensure that employees whose duties include emergency response have been trained in spill response.	Spill Response Training is handled by ACG with their safety personnel. Training is required for Arlington County Police Department and Arlington County Fire Department emergency response personnel. Please refer to ACG's annual report on spill response training.	APS/F&O in coordination with ACG/DES	Not applicable. APS personnel duties do not include emergency response.	Not applicable. APS personnel duties do not include emergency response.
(12) Maintain documentation of each training event.	Training events are kept on file by the appropriate office.	APS/F&O in coordination with ACG/DES	Maintain documentation for a minimum of three years after the training event.	List of the training events conducted, including date, number of employees attending, and objective of the training event.

Permit Requirement	BMP Name and Description	Responsible Party	Measurable Goal & Schedule	MS4 Annual Reporting Requirements
II. TMDL Special Conditions				
A. Chesapeake Bay TMDL Special Condition				
(1) Reduce the load of total nitrogen, total phosphorus, and total suspended solids by at least 40% of the Level 2 (L2) Scoping Run Reductions.	APS will execute the most recent version of its 40% Chesapeake Bay Total Maximum Daily Load (TMDL) Action Plan to achieve total nitrogen, total phosphorus, and total suspended solids load reductions through the means and methods identified in the plan.	APS/F&O	Reduce loads by at least 40% no later than the expiration date of the 2018-2023 MS4 Permit.	<p>A list of BMPs implemented during the reporting period, and the estimated reduction by each reported in pounds per year.</p> <p>A statement that nutrient credits were acquired, if applicable.</p> <p>The progress toward meeting the required cumulative reductions.</p> <p>A list of BMPs planned to be implemented during the next reporting period.</p>
(2) Offset 40% of the increased loads from new sources.	The revised APS Chesapeake Bay TMDL Action Plan account for increased loads from new sources initiating construction between July 1, 2009, and June 30, 2019. The Draft Chesapeake Bay TMDL Action Plan submitted to DEQ with the Registration Statement and application for coverage under the 2018-2023 MS4 Permit was developed accounting for new sources initiating construction between July 1, 2009 and June 30, 2014, as specified in the Chesapeake Bay TMDL Action Plan Guidance Memo (Guidance Memo No. 15-2005, dated May 18, 2015).	APS/F&O	Offset 40% of increased loads from new sources no later than the expiration date of the 2018-2023 MS4 Permit.	Copy of the revised Chesapeake Bay TMDL Action Plan.
(3) Offset the increased loads from grandfathered projects.	Permittees are required to offset increased loads from projects grandfathered in accordance with 9VAC25-870-48 that begin construction after July 1, 2014. APS has no projects that meet these requirements; therefore, no offset is required.	APS/F&O	None. APS has no applicable projects.	None.

Permit Requirement	BMP Name and Description	Responsible Party	Measurable Goal & Schedule	MS4 Annual Reporting Requirements
II. TMDL Special Conditions (continued)				
A. Chesapeake Bay TMDL Special Condition (continued)				
(4) Submit an updated Chesapeake Bay TMDL action plan that meets the requirements of the Chesapeake Bay TMDL Special Condition of the 2018-2023 MS4 Permit.	APS will review its Chesapeake Bay TMDL Action Plan to determine compliance with the requirements of the Chesapeake Bay TMDL Special Condition of the 2018-2023 MS4 Permit. If revisions are necessary to comply, APS will revise its TMDL Action Plan and resubmit to DEQ for review.	APS/F&O	Submit updated TMDL Action Plan no later than 12 months after the 2018-2023 MS4 Permit effective date.	Statement of the status of the Chesapeake Bay TMDL Action Plan (e.g., Draft submitted to DEQ, Public Notice, Final approved by DEQ). Copy of the revised Chesapeake Bay TMDL Action Plan.
B. Local TMDL Special Condition				
(1) Develop a local TMDL action plan, if applicable, and incorporate each local TMDL action plan into the MS4 Program Plan.	APS has not been allocated a wasteload for any EPA-approved TMDLs, so is not required to develop a local TMDL Action Plan. APS shall continue to monitor updates to Local TMDLs for wasteload allocations (WLAs).	APS/F&O	Monitor updates to Local TMDLs for WLAs.	Statement that TMDL Action Plan has been developed, if applicable.