



# COMMONWEALTH of VIRGINIA

SHARON BONAVENTURA  
FACILITY DIRECTOR

DEPARTMENT OF  
BEHAVIORAL HEALTH AND DEVELOPMENTAL SERVICES

521 Colony Road  
Madison Heights, Virginia 24521

Telephone (434) 947-6326  
Fax (434) 947-2140

September 25, 2014

Mr. Jesse Roberts  
DEQ Blue Ridge Regional Office  
3019 Peters Creek Road  
Roanoke, Virginia 24019

RE: MS4 Annual Report, July 1, 2013 - June 30, 2014, **Permit #VAR040121**  
Central Virginia Training Center, Madison Heights, VA

Dear Mr. Roberts:

As required under our MS4 Permit, attached is the annual report covering the actions conducted by Central VA Training Center for the period of July 1, 2013 thru June 30, 2014.

If you or your staff have any questions, please contact me at (434) 947-6300 or by email at [richard.w.hall@dbhds.virginia.gov](mailto:richard.w.hall@dbhds.virginia.gov).

Sincerely,

Richard W. Hall  
Physical Plant Director

cc: Mike Bryant, Risk Management  
Ronnie Woodall, Facility Support Director

**CVTC-MS4 Program Plan-VAR040121 (Minimum Control Measure #1-Public Education & Outreach on Stormwater) July 1, 2013 to June 30, 2014**

BMP Category	Elements of BMP	Measurable Goal and Effectiveness	2013-2014 Annual Objectives Achieved	2014-2015 Objectives
1.a. Education on Stormwater Discharges to Impaired Waters	<p>In addition to its existing education program, CVTC will educate the hospital community on discharges to impaired waters, in particular, Williams Creek. CVTC will continue to use diverse media (including but not limited to its weekly bulletin, its website, and its annual training). Materials will be revised, as needed, to appropriately address Williams Creek.</p>	<ul style="list-style-type: none"> <li>• Track the number of materials that have been published and distributed.</li> <li>• Qualitatively track the number of materials that are taken by the community</li> <li>• Include a "ticker counter" on CVTC website</li> </ul>	<p>1. Distributed printed materials for stormwater management and tracked the number of materials taken. 2. Updated bulletin boards in public locations. 3. Via CVTC Campus Connection (monthly newsletter), posted stormwater education tips. 4. Distributed stormwater brochures (Watershed Connections) during a half marathon event that that was partially facilitated through CVTC's campus. 5. Key management personnel attended a one day workshop pertaining to stormwater management.</p>	<p><b>CVTC will continue to provide general education to the public through brochures, posters, bulletin boards, CVTC's monthly Campus Connection, and flyers handed out during special events.</b></p>
1.b. Education on Hazards Associated with Illegal Dumping	<p>In addition to its existing education program, CVTC will educate the hospital community on hazards associated with illegal dumping. CVTC will continue to use diverse media (including but not limited to its weekly bulletin, its website, and its annual training) to increase education on illegal dumping. Materials will be revised, as needed.</p>	<ul style="list-style-type: none"> <li>• Track the number of materials that have been published and distributed.</li> <li>• Qualitatively track the number of materials that are taken by the community</li> <li>• Include a "ticker counter" on CVTC website</li> </ul>	<p>1. Posted Illegal dumping education on bulletin board in public Canteen, and employee bulletin board in Physical Plant Services. 2. Distributed education brochures and tracked the number of materials taken.</p>	<p><b>CVTC will continue to provide general education to the public through brochures, posters, bulletin boards, CVTC's monthly Campus Connection, and flyers handed out during special events.</b></p>

<p>I.c. Involvement in Water Quality Improvement Projects</p>	<p>CVTC will continue its participation in activities that promote improved water quality in the area. CVTC will continue to participate in internal clean-up programs as well as promote external clean-up using other organizations.</p>	<ul style="list-style-type: none"> <li>• CVTC will post the dates of improvement projects on its website as well as the number of attendees</li> </ul>	<p>CVTC posted on its web site <b>Events Tab under "Storm Water Plan"</b> community events so the community can get involved with a project to clean up and to protect our water ways.  <a href="http://www.cvtc.dbhds.virginia.gov">http://www.cvtc.dbhds.virginia.gov</a>. CVTC also posted in the Campus Centerline (monthly newsletter) upcoming community events. On October 16, 2013 Individuals and staff from CVTC participated in a volunteer clean-up project through Lynchburg's Parks and Recreation.</p>	<p><b>CVTC will continue to seek opportunities to be involved in any up-coming improvement projects.</b></p>
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CVTC-MS4 Program Plan-VAR040121 (Minimum Control Measure #2-Public Participation & Involvement) July 1, 2013 to June 30, 2014

BMP Category	Elements of BMP	Measurable Goal and Effectiveness	2013-2014 Annual Objectives Achieved	2014-2015 Objectives
2.a. Reporting Procedures	CVTC will develop reporting procedures for notifying appropriate personnel of stormwater observations and possible violations. Procedures will also be developed for receipt and consideration of information submitted by the public for construction related issues. Such information will be integrated into the educational material.	Track the number of communications/complaints that are received	CVTC developed a spreadsheet to document reported violations which include the date, time, location, proper authority notified, and findings. Requests for these documents can be made thru our PPS Office @ (434)947-6300 or by email to richard.w.hall@dbhds.virginia.gov. No communications/complaints were reported during this period.	<b>Continue to track communications and complaints. CVTC will add a Stormwater Complaint Form to it's website.</b>
2.b. Availability of MS4 Program Plan and Annual Report	CVTC will make available both its MS4 Program Plan and its annual reports. These documents will be posted on the CVTC website, which would be available for download. CVTC will develop procedures to record comments that are received from the community.	Track the number of comments received by the community	Annual reports and other information about the MS4 Permit is available on the CVTC Stormwater Website: <a href="http://www.cvtc.dbhds.virginia.gov/">http://www.cvtc.dbhds.virginia.gov/</a> No comments on any topics relating to the MS4 permit were received during the reporting period.	<b>Maintain the website. Increased accessibiity of information about stormwater at CVTC and the MS4 Program Plan to the general public.</b>
2.c. Increased Involvement in Water Quality Improvements Projects	CVTC will continue to promote community involvement by posting dates of activities on its website as well as other forms of communication, if appropriate.	CVTC will post the dates of improvement projects on its website as well as the number of attendees	Tracked monthly attempts to locate Water Quality Improvement events for posting on a physical plant work order. CVTC promoted a community event on it's website during this reporting period which is a James River Regional Clean-up held by JRAC. . <a href="http://www.cvtc.dbhds.virginia.gov/">http://www.cvtc.dbhds.virginia.gov/</a>	<b>Track number of activities CVTC participate in. Increase public awareness and involvement in water quality issues.</b>

CVTC-MS4 Program Plan-VAR040121 (Minimum Control Measure #3-Illicit Discharge Detection and Elimination) July 1, 2013 to June 30, 2014

BMP Category	Elements of BMP	Measurable Goal and Effectiveness	2013-2014 Annual Objectives Achieved	2014-2015 Objectives
3.a. Stormwater Drainage System Map	CVTC will update and consolidate its stormwater drainage system map. The map will show all known outfall locations, the associated receiving water body, and the associated HUCs. As the drainage system changes due to development, the map will updated in a timely manner.	Maintain a current and accurate stormwater drainage system map	No new outfalls were added during the reporting period.	<b>Map of regulated outfalls will be maintained and updated as changes occur.</b>
3.b. Illicit Discharge Screening	CVTC will develop a "Task Report", which will be used as the illicit discharge screening system, under its existing Preventive Maintenance (PM) program. The "Task Report" will include appropriate screening items that meet the objective of the publication entitled "Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessment," Environmental Protection Agency. If any illicit discharges and/or suspect discharges are found a "Corrective Action Report" will be generated.	Develop and maintain an effective screening system. The goal for this BMP will be the development and implementation of screening procedures as well as tracking the number of illicit discharges detected through such screening procedures.	CVTC continues to visually inspect storm drains through our Preventive Maintenance Program. Through continuous compliance, CVTC maintained its UST Monitoring System. No illicit discharges were discovered by way of these inspections during this reporting period.	<b>Continue with existing preventive maintenance program, and daily monitoring of UST.</b>

<p>3.c. Illicit Discharge Tracking System</p>	<p>Develop a system to effectively track the number of illicit discharges identified through the Task Report system. The system will include a total count of the number of occurrences as well as a narrative on how they were controlled or eliminated.</p>	<p>Develop and maintain an effective tracking system. The goal for this BMP will be measured by the number of illicit discharges detected and the overall elimination or reduction of such discharges.</p>	<p>One sewer leak occurred at CVTC during this reporting period. This happened on April 09, 2014. Lines were clogged, causing over-flow issues at clean-out locations serving buildings 11 &amp; 12. The clog was identified and removed; sewer lines were jetted. This overflow was responded to immediately upon discovery and cleaned up promptly. DEQ was immediately notified.</p>	<p><b>Continue to publicize CVTC phone numbers for illicit discharge reporting, and continue to track the number of illicit discharges.</b></p>
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CVTC-MS4 Program Plan-VAR040121 (Minimum Control Measure #4-Construction Site Stormwater Runoff Control) July 1, 2013 to June 30, 2014

BMP Category	Elements of BMP	Measurable Goal and Effectiveness	2013-2014 Annual Objectives Achieved	2014-2015 Objectives
4.a. Erosion and Sediment Control During Construction	<p>As a State agency, CVTC must follow the State review process for plans and drawings, which includes submissions to the Bureau of Capital Outlay Management, the Department of Environmental Quality, the Department of Conservation and Recreation, etc. This review process ensures that the required DCR approvals and permits are obtained prior to construction and in accordance with State and federal law pertaining to construction projects. Copies of all necessary permits (i.e. VSMP construction permit) will be provided to the Assistant Director's office as part of the construction documents. In addition, unlike typical MS4's (i.e., counties and cities) where most of the development involves private entities, any construction that occurs on the respective campuses is managed and operated by the hospital and its representatives. Therefore, CVTC and the DBHDS have inherent control over the construction activities that occur on each campus through the use of the General Conditions of the Construction Contract document developed by the Department of General Services (DGS).</p>	<p>Continue current practices that ensure compliance with appropriate state and federal laws pertaining to construction projects.</p>	<p>All E&amp;S Plans are reviewed by DCR for approval before project construction begins.</p>	<p><b>Continue current practices that ensure compliance with state &amp; local regulations.</b></p>
4.b. Construction Site Inspection	<p>CVTC will develop and employ procedures for site inspection and enforcement of control measures. During the actual construction phase, a State certified Erosion and Sediment Control inspector will inspect the site for all erosion and sediment control measures provided by the contractor to ensure that the contractor continues to maintain these measures throughout the project.</p>	<p>The goal for the BMP will be measured by the site inspections performed and the documented findings and the severity of those findings.</p>	<p>Inspector from A&amp;E Services conducts inspections of all CVTC construction sites.</p>	<p><b>Continue to have inspector from A&amp;E Services conduct inspections of all CVTC construction sites.</b></p>

4.c. Land Disturbance Activity Tracking System	CVTC will track regulated land-disturbing activities and submit the total number of regulated activities and total disturbed acreage.	Track the number of regulated land-disturbing activities	No land disturbing activities during the reporting period.	<b>Continue to track regulated land-disturbing activities.</b>
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**CVTC-MS4 Program Plan-VAR040121 (Minimum Control Measure #5-Post Construction Stormwater Management in New Development and Redevelopment)**

BMP Category	Elements of BMP	Measurable Goal and Effectiveness	2013-2014 Annual Objectives Achieved	2014-2015 Objectives
5.a. Stormwater Controls	<p>CVTC must follow the State review process of plans and drawings, which includes submissions to the Bureau of Capital Outlay Management (to ensure compliance with Construction &amp; Professional Services Manual), the Department of Environmental Quality, the Department of Conservation and Recreation, etc. This review process ensures that projects are initially designed using state technical criteria and that the required approvals and permits are obtained prior to construction and in accordance with the Virginia Stormwater Management Act (VSMA). Any construction that occurs on the respective campuses is managed and operated by the campus and its representatives. Therefore, CVTC and DBHDS have inherent control over the construction activities that occur on each campus through the use of the General Conditions of the Construction Contract document developed by the DGS.</p>	<p>Continue current practices that ensure compliance with appropriate state and federal laws pertaining to stormwater management.</p>	<p>All projects are reviewed for compliance with appropriate state and federal regulations pertaining to stormwater management.</p>	<p><b>Continue current practices that ensure compliance with appropriate state and federal regulations pertaining to stormwater management.</b></p>
BMP Category	Elements of BMP	Measurable Goal and Effectiveness	2012-2013 Annual Objectives Achieved	2013-2014 Objectives

<p>5.b. Site Inspection and Maintenance</p>	<p>CVTC will continue a program for the periodic inspection and maintenance of structural stormwater controls after construction has been completed and the building turned over to the facility. CVTC will revise its current "Task Report" for annual cleaning of storm drains to meet this state objective of this MCM. If degradations and obstructions are observed, necessary steps will be taken to correct the findings using a "Corrective Action Report". During adverse weather, any drains that are observed to be backed up due to debris or foliage are opened up and allowed to flow freely.</p>	<p>The goal for this BMP will be measured by the number of inspections performed and the associated findings.</p>	<p>Apon forecasting and during adverse weather, any drains that are observed to be backed up due to debris or foliage are opened up and allowed to flow freely. Sites are inspected during the semi-annual preventive maintenance work order which includes removing, as necessary, sediment and debris. Parking lots and streets are blown following signifiant weather events.</p>	<p><b>Continue with existing maintenance program.</b></p>
<p>5.c. Permanent Stormwater Management Tracking System</p>	<p>The objective for this BMP is to develop a tracking system for all permanent stormwater management facilities. CVTC, where installed, will track all known permanent stormwater management facilities that discharge to the MS4 including the following information: type of BMP, HUC, receiving water body, and acres treated.</p>	<p>The goal for this BMP will be measured by the tracking system developed.</p>	<p>CVTC maintains a database of all structures as described in the measurable goal.</p>	<p><b>Continue monitoring database.</b></p>

CVTC-MS4 Program Plan-VAR040121 (Minimum Control Measure #6-Pollution Prevention/Good Housekeeping for Facility Operations) July 1, 2013 to June 30, 2014

BMP Category	Elements of BMP	Measurable Goal and Effectiveness	2013-2014 Annual Objectives Achieved	2014-2015 Objectives
6.a. Training	CVTC will continue to utilize existing training programs (including but not limited to annual training for Buildings & Grounds, Transportation, Security, and Housekeeping). In addition, CVTC will incorporate an educational video on MS4 and Pollution Prevention to selected departments.	The goal for this BMP will be measured by the number of individuals trained on an annual basis.	During the annual Learning Management System (LMS) training course all CVTC staff was educated on our "Stormwater Management Plan". This past year approx. 1,225 staff were trained. Annual training is required of staff that work with regulated chemicals.	<b>Continue to provide training on environmental awareness. Track number of individuals trained.</b>
6.b. Materials Handling and Storage	CVTC will develop materials handling and storage procedures that effectively address the following issues: Eliminate illicit discharges from storage yards, fleet or maintenance shops, and outdoor storage areas. Waste materials are properly disposed. Materials that are soluble or erodible shall be protected from exposure to precipitation	The goal for this BMP will be the elimination of illicit discharges from facility operations as well as proper disposal of all waste materials.	All Waste oils and anti-freeze are recycled. A vendor picks up the material for recycling. Hazardous materials and wastes are properly disposed of.	<b>Continue to collect &amp; recycle used oil &amp; anti-freeze. Document used oil and used antifreeze recycling programs and amount.</b>
6.c. Nutrient Management	A nutrient management plan is currently under review by DCR for approval. Upon approved, employees will be trained in the nutrient management plan and procedures will be followed. DCR has been notified regarding the hospital's status	CVTC will have random soil samples taken to ensure that nutrient application rates are not being exceeded and that they are consistent with the NMP. Where adjustments are needed, the NMP will be updated to reflect new requirements and copies provided to the Department of Conservation and Recreation as needed.	The CVTC Nutrient Plan approved on May 15, 2013; expires September 30, 2016.	<b>Update and maintain Nutrient Management Plan as necessary.</b>



# COMMONWEALTH of VIRGINIA

Molly Joseph Ward  
Secretary of Natural Resources

DEPARTMENT OF ENVIRONMENTAL QUALITY  
Blue Ridge Regional Office  
[www.deq.virginia.gov](http://www.deq.virginia.gov)

David K. Paylor  
Director

Robert J. Weld  
Regional Director

**Lynchburg Office**  
7705 Timberlake Road  
Lynchburg, Virginia 24502  
(434) 582-5120  
Fax (434) 582-5125

**Roanoke Office**  
3019 Peters Creek Road  
Roanoke, Virginia 24019  
(540) 562-6700  
Fax (540) 562-6725

February 19, 2015

Mr. Richard Hall  
Physical Plant Director  
Central Virginia Training Center  
521 Colony Road  
Madison Heights, Virginia 24521

**RE: VAR040121, MS4 Permit, Central Virginia Training Center, Madison Heights, Virginia  
2014 MS4 Annual Report Review**

Dear Mr. Hall:

On September 25, 2014, the Virginia Department of Environmental Quality (DEQ) received Central Virginia Training Center's 2014 MS4 Annual Report submitted in accordance with its "General Permit for Discharges of Stormwater from Small Municipal Separate Storm Sewer Systems" (MS4 Permit).

Based upon a review of the 2014 Annual Report, additional items are requested to complete the report. Attached is an "Annual Report Checklist" summarizing DEQ's review of the County's annual report. Items marked "Yes" are accepted as submitted, although in some cases there may be remarks to clarify certain items. Items marked "N/A" are not applicable this report cycle. Items marked "No" are followed by an "Annual Report Comment" describing items requested to clarify the annual report. In some cases, items marked "No" are followed by "Program Comments" summarizing the location of a program requirement in the MS4 Permit.

After reviewing this letter and checklist, please respond in writing to DEQ **within 14 days** of the date of this letter to the items summarized in the checklist.

If you have any questions, please contact me at 434-485-3979 or [bridget.winks@deq.virginia.gov](mailto:bridget.winks@deq.virginia.gov).

Sincerely,

A handwritten signature in cursive script that reads "B. Amanda Winks".

B. Amanda Winks  
Stormwater Compliance Specialist

Enclosure: MS4 Annual Report Checklist

cc: Cody Boggs, DEQ-BRRO (via e-mail)  
Central Office MS4 Coordinator, DEQ (via e-mail)



# *COMMONWEALTH of VIRGINIA*

## *DEPARTMENT OF BEHAVIORAL HEALTH AND DEVELOPMENTAL SERVICES*

Sharon Bonaventura  
Facility Director

Voice/TDD (434) 947-2336  
Fax (434) 947-2140

CENTRAL VIRGINIA TRAINING CENTER

P.O. Box 1098  
Lynchburg, VA 24505  
(434) 947-6000

May 8, 2015

To: **The Department of Environmental Quality**  
Blue Ridge Regional Office  
7705 Timberlake Road  
Lynchburg, VA 24502

Attn: B. Amanda Winks  
Storm Water Compliance Specialist

Re: VAR040121, MS4 Permit, Central Virginia Training Center, Madison Heights, Virginia 2014  
Annual Report Review

Dear Mrs. Winks:

Please find the attached responses to your review of CVTC's Ms4, Plan Year 1, Annual Report.

Thank you for your attention to detail and kind considerations for granting CVTC a time extension to provide required responses to your review and for taking the time to meet to discuss our questions and concerns.

If you have any further questions, please contact me at 434-947-6300 or via email @ richard.w.hall@dbhds.virginia.gov.

Sincerely,

Richard W. Hall  
Physical Plant Services Director  
Central Virginia Training Center

Cc: Sharon Bonaventura, M.A. BCBA, Licensed Behavior Analyst, Facility Director,  
Central Virginia Training Center  
David Cole, Assistant Director of Administration, Central Virginia Training Center



# MS4 Annual Report Checklist

Facility: Central Virginia Training Center Permit Number:VAR040121 Year:2013-2014

Date Completed: 01/22/2015 Reviewer: A. Winks

## Background Information

### II.E.3.a(3)

Modifications to any operator's department's roles and responsibilities

#### **CVTC Response:**

Central Virginia Training Center's Physical Plant Department remains the responsible department of the permit.

## Condition Additional Reporting Requirements

### II.E.3.b

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

**AR Comments:** Status of compliance and assessment of appropriateness is not addressed in the annual report.

**Program Comments:** *Within 14 days of the date of the MS4 checklist transmittal letter, CVTC is requested to provide the status of compliance with the state permit conditions and the assessment of appropriateness of the identified BMPs and progress towards achieving the measurable goals for each MCM.*

#### **CVTC Response:**

#### Control Measure #1 Public Education and Outreach

In permit year 2013-2014, Central Virginia Training Center, herein referred to as CVTC, focused on public education and outreach; the following objectives were accomplished:

1. CVTC distributed printed materials for storm water management.
2. Maintained bulletin boards in public locations.
3. Posted storm water educational tips in our "Campus Connection," CVTC's monthly newsletter to all staff members/employees.
4. Posted storm water events that were intended to invite the community to participate in storm water cleanup efforts.

In the next permit year, CVTC will continue efforts to maintain storm water pollution awareness, utilizing these methods for public outreach and awareness.

Assessment: Considering the number of educational brochures that were distributed, this BMP appears to be appropriate and will be continued. However, it is understood that Williams Creek is not listed in the Virginia Department of Environmental Quality's Part 1A - Impaired Waters table. CVTC's target for the nearest impaired waterway is the James River. CVTC has not been assigned a waste load allocation for the approved TMDL for the James River Basin.

### Control Measure #2 Public Participation and Involvement

CVTC's control measure #2, focused on public participation and involvement. One established procedure is to provide a means for the public to contact CVTC to report illicit storm water discharges. The public can notify the Physical Plant Department via a telephone message or by way of an email to the Physical Plant Director to report such eyewitness accounts. CVTC also posted its MS4 program on the web site for public review and comments. In addition, CVTC was persistent in efforts to locate and post storm water cleanup events on its website.

Although this approach has the potential to be successful in increasing public participation and involvement, there is no good method for accurately capturing the amount of public participation.

Assessment:

Considering the possible infinite numbers of potential readers, this BMP appears to be appropriate and will be sustained.

### Control Measure #3 Illicit Discharge Detection and Elimination

Central Virginia Training Center continues to maintain its map of storm water outfalls, in which there were no changes to this documentation during the reporting cycle. CVTC was also committed to the development of a "Task Report," and a "Corrective Action Report," providing details of illicit discharge detections, following a routine preventative maintenance established program. Although CVTC's preventative maintenance program continued to monitor and initiate corrective actions for identified deficiencies concerning existing constructed outfalls of its storm water system, the Task Report and Corrective Action Report was never established, since there were no reports of illicit discharges associated with preventative maintenance. However, one illicit discharge was reported to the office of the Department of Environmental Quality as a result of a corrective maintenance task. This discharge involved a sanitary sewer overflow.

For the next reporting cycle, CVTC will report the results of Corrective Maintenance efforts in lieu of Preventative Maintenance tasks in a "Task Report," and a "Corrective Action Report," as initially committed for Preventative Maintenance efforts. This information will be sent immediately to DEQ as illicit discharges at the time of identification. Corrective actions and procedures will be a part of this report. CVTC will also continue to publicize phone numbers on its web site for illicit discharge reporting by the public and continue to track the number of these reports.

Assessment:

CVTC will continue its commitment to report, however the findings will reflect Corrective Maintenance tasks in lieu of Preventative Maintenance.

#### Control Measure #4 Construction Site Storm Water Runoff Control

Renovation construction for building #10 began in the fall of 2013. It was brought to CVTC's attention that an approved permit for land disturbing activity had not been obtained through the Department of Environmental Quality prior to the start of construction. The approved permit and inspection process will be reported in the next MS-4 report for 2014-2015.

Assessment:

CVTC will continue its commitment to report and obtain required permits for construction activities involving land disturbing activities.

#### Control Measure #5 Post- Construction Storm Water in New Development and Redevelopment

CVTC has no new storm water facilities to report this permit cycle.

Assessment:

CVTC will continue its commitment to report any new storm water facilities and follow program guidelines, should any new developments take place.

#### Control Measure #6 Pollution Prevention/Good Housekeeping for Facility Operations

CVTC utilized an existing staff development program to provide continuing education for the training of over 1100 staff members. The training included Classification and Labeling of Chemicals and Storm Water Awareness. CVTC also continues to actively employ a contract with an environmental vendor for the proper disposal and/or recycling of hazardous waste including, but not limited to: used automotive oil and filters, paint solvents, refrigerants, lighting ballasts and ant-freeze/coolant materials. In addition, CVTC continues recycling efforts involving paper and plastics.

An approved nutrient management plan remains in effect for CVTC's campus grounds. However, due to budget constraints and the plan for the facility closure in the year 2020, CVTC has not applied any nutrient management chemicals. For this reason, random soil samples to insure nutrient application rates were not exceeded were omitted.

Assessment:

CVTC will continue its efforts for Pollution prevention and good housekeeping efforts; this control measure plays an important role for facility operations and environmental "good stewardship."

### **II.E.3.c**

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

**AR Comments:** Annual report states that random soil samples are taken as part of CVTC's Nutrient Management Plan.

**Program Comments:** *Within 14 days of the date of the MS4 checklist transmittal letter, CVTC is requested to provide the results of the soil samples.*

#### **CVTC Response:**

CVTC does not apply chemicals to its grounds for nutrient management. All grounds operations basically consist of mowing, mulching, weed eating and edging. For this reason, soil samplings to insure over-applications were not performed.

### **II.E.3.d**

A summary of the storm water activities the operator plans to undertake during the next reporting cycle.

**AR Comments:** Annual report only states that existing activities will continue. A summary is not given.

**Program Comments:** *Within 14 days of the date of the MS4 checklist transmittal letter, CVTC is requested to provide a summary of the storm water activities that will be completed in PY2.*

#### **CVTC Response:**

The preceding sections of this report provide a brief description of the activities that CVTC intends to focus on in plan year number 2.

### **II.E.3.e**

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

**AR Comments:** Changes in identified best management practices or minimum control measures are not address in the annual report.

**Program comments:** *Within 14 days of the date of the MS4 checklist transmittal letter, CVTC is requested to provide any changes in identified BMPs or MCMs including steps taken to address any deficiencies.*

#### **CVTC Response:**

The required changes to BMPs or Measurable Goals, from the previous permit requirements, have been outlined in the preceding sections and in the MS4 Program Plan document. Any changes made to BMPs or Measurable Goals in subsequent permit years will be reflected in this section.

### **II.E.3.f**

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

**AR Comments:** Notice that CVTC is not specifically addressed in the annual report.

**Program Comments:** *Within 14 days of the date of the MS4 checklist transmittal letter, CVTC is requested to provide notice that the operator is relying on another government entity to satisfy some of the state permit obligation, if applicable.*

#### **CVTC Response:**

CVTC does not rely on any other governmental entity to satisfy state permit obligations.

### **II.E.3.g**

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

**AR Comments:** The approval states of any programs pursuant to Section IIC is not addressed in the annual report.

**Program Comments:** *Within 14 days of the date of the MS4 checklist transmittal letter, CVTC is requested to provide the approval states of any programs pursuant to Section IIC, if applicable.*

#### **CVTC Response:**

CVTC has no programs operating under Section II C.

### **II.E.3.h**

Information required for any applicable TMDL special condition contained in Section I.

**AR Comments:** The annual report states that Williams Creek is impaired and that education is provided.

**Program Comments:** *Within 14 days of the date of the MS4 checklist transmittal letter, CVTC is requested to provide information required for any applicable TMDL special conditions.*

#### **CVTC Response:**

Section I. a of CVTC's MS4 program plan indicates that Williams Creek is impaired. Although Williams Creek is a close waterbody/stream, it is not listed in the Virginia Department of Environmental Quality's Part 1A - Impaired Waters table and does not have an approved Total Maximum Daily Load that triggers the special conditions of part I of the MS4 permit. CVTC's target for the nearest impaired waterway is the James River. CVTC has not been assigned a waste load allocation under an approved TMDL.

## **Permit Requirements MCM 1 –Public Education and Outreach Stormwater Impacts**

### **II.B.1.g(1)**

A list of the education and outreach activities conducted during the reporting period for each high-priority water quality issue, the estimated number of people reached, and an estimated percentage of the target audience or audiences that will be reached.

**AR Comments:** The annual report lists three BMPs that have existing educational programs/involvement. The program plan is unclear as to whether or not these identified BMPs are the high priority water quality issues as the previous permit's program plan lists the same BMPs. A target audience, estimated percentage, and the target audience reached are not given. These high priority water quality issues should meet the criteria as set forth by II.B.1c(1).

**Program Comments:** *Within 14 days of the date of the MS4 checklist transmittal letter, CVTC is to provide the three high priority water quality issues addressed in the annual report along with the target audience, equivalent 20% and the estimated number of people CVTC is also requested to provide, in reference to BMP 1a and 1b, the number of materials that have been published and distributed, the number of materials taken by the community, and the ticker counter. CVTC is also requested to provide participation information for the volunteer clean-up project through Lynchburg's Parks and Recreation.*

### **CVTC Response:**

A listing of the three high priority water quality issues addressed during plan year one is as follows: Education on Storm water Discharges to Impaired Waters, Education on Hazards associated with Illegal Dumping and Involvement on Water Quality Improvement Projects. The target audience for CVTC is consistent with the EPA interpretation and example of the DOD's target audience defined as "the resident and employee population within the fence line of the facility." Currently CVTC provides a home for approximately 240 individuals and employs approximately 1180 staff members. The target audience for CVTC should be interpreted as 1400 with an annual goal of 280 public outreach candidates. For this plan year, CVTC achieved the following:

1. CVTC placed 770 published materials/pamphlets on bulletin boards and public displays such as in CVTC's Canteen, Regional Community Support Center waiting area, administrative waiting areas available to the public as well as in public forums. In addition, CVTC listed information concerning storm water management on its website that maintains a clicker counter, indicating the number of visitors to its site.
2. CVTC was successful in distributing 616 published pamphlets during the reporting year. In addition, staff distributed 15 "Watershed Connections," brochures at the annual Riverside Runners Lynchburg Half Marathon event on August 30, 2013 and handed out 20 brochures titled "Protecting American's Founding River," to PPS and Transportation employees on July 25, 2013.
3. Volunteer Cleanup efforts:
  - a. CVTC published in its September Campus Connection, an invitation to participate in the James River Regional Cleanup event which took place on September 14, 2013. It is reported that individuals and staff attended this event; however, the exact number of participants was not captured.

- b. On October 26, 2013, eight individuals who are members of “The special Friends Exchange Club,” took on a volunteer project through the Lynchburg Parks and Recreations titled “Adopt-a-Trail.” CVTC’s group chose the Percival Island Trail to clean. This group committed to sustain the trail through trash collection twice a year.
- c. During the reporting period year, Building 18, suite B, began collecting plastic bottles to place in recycling containers as a storm water pollution prevention task. They were successful in collecting 8,964 bottles!
- d. The Physical Plant Department included in its Landscape Management contract to an outside resource, to clean up all trash and/or debris located at or near storm water inlets in an attempt to provide a continuous clean-up effort of its storm water inlets and outfalls.

**II.B.1.g(2)**

A list of the education and outreach activities that will be conducted during the next reporting period for each high-priority water quality issue, the estimated number of people that will be reached, and an estimated percentage of the target audience or audiences that will be reached.

**AR Comments:** The 2014-2015 Objectives listed in the report only address general education and do not provide the estimated number of people that will be reached and the estimated 20%.

**Program Comments:** *Within 14 days of the date of the MS4 checklist transmittal letter, CVTC is requested to provide a list of education and outreach activities that will be conducted during PY2. Estimated target audience and number reached/equivalent percentage must also be addressed.*

**CVTC Response:**

The Central Virginia Training Center is scheduled to close its facility by June 30, 2020; the number of residents and staffing will gradually decrease yearly until the target date is reached. Since the announcement of closure in 2011, the number of CVTC residents has declined by approximately 35 percent. This number continues to decrease as the progression towards closure approaches. For the up-coming plan year, the target audience will decrease to reflect the number of residents that are no longer living on CVTC’s campus. At this time, it is not feasible to capture an accurate target audience, however for now; CVTC will attempt to reach a target audience of 1400 with an annual goal of 280 public outreach candidates.

Lists of educational activities will include:

- 1. Take opportunities to distribute storm water pamphlets and brochures at public events.
- 2. Through its electronic Learning Management System, CVTC’s Physical Plant Services Department will promote training power points to approx. 1100 staff members. This training will include short review tests at the end of the training to review to major implications of BMP’s.

3. The Physical Plant Services Department will be involved in training sessions to update procedures concerning our Oil Discharge Contingency Plan and SWPPP, (CVTC has a 90,000 gallon above ground oil tank in the close proximity of an incidental stream).

### **Permit Requirements MCM 2 – Public Involvement/participation**

#### **II.B.2.d(1)**

A web link to the MS4 Program Plan and annual report.

**AR Comments:** A direct web link is not provided. The program plan has not been updated to the most current document. An annual report is not specifically mentioned.

**Program Comments:** *Within 14 days of the date of the MS4 checklist transmittal letter, CVTC is requested to provide a web link to the Annual Report and Program Plan. Copies of the annual report must be posted within 30 days of submittal to the department.*

#### **CVTC Response:**

For permit year one and throughout the remaining years of the plan, the general permit is published on CVTC's website @ [www.cvtc.dbhds.virginia.gov](http://www.cvtc.dbhds.virginia.gov). A tab labeled "Storm Water Plan," is clicked to reference the Storm Water Plan and yearly reports.

*Following the review by DEQ of the revised annual report, CVTC will post all submissions for plan year #1 on its web site.*

#### **II.B.2.d(2)**

Documentation of compliance with the public participation requirements of this section.

**AR Comments:** A minimum of four local activities must be conducted annually. Annual report states that CVTC tracked monthly attempts to locate events. Annual report stated that CVTC participated in one event but provided no participation numbers.

**Program Comments:** *Within 14 days of the date of the MS4 checklist transmittal letter, CVTC is requested to provide the tracked monthly attempts to locate water quality improvement events. CVTC is also requested to provide documentation of participation in the James River Regional Clean-up event.*

#### **CVTC Response:**

CVTC's Physical Plant Department has an established work order to partake in attempts to locate water quality improvement events. This work order is completed once a month during the entire plan cycle. Previous sections of this report have outlined CVTC's participation efforts in clean-up activities during the plan year.

### **Permit Requirement MCM 3 – Illicit Discharge Detection and Elimination**

#### **II.B.3.f(1)**

A list of any written notifications of physical interconnection given by the operator to other MS4s.

**AR Comments:** Not addressed in annual report or program plan.

**Program Comments:** *Within 14 days of the date of the MS4 checklist transmittal letter, CVTC is requested to provide a list of any written notifications of physical interconnection given by the operator to other MS4s.*

**CVTC Response:**

There were no written notifications of physical interconnection given by the operator to other MS4s during the reporting period.

**II.B.3.f(2)**

The total number of outfalls screened during the reporting period, the screening results, and detail of any follow-up actions necessitated by the screening results.

**AR Comments:** Annual report states that storm drains were visually inspected. Annual report does not address the total number of outfalls. Annual report does not list total number of outfalls screened during this reporting period. If CVTC has less than 50 outfalls, all 50 must be screened annually. If there are more than 50 outfalls, a minimum of 50 must be screened annually.

**Program Comments:** *Within 14 days of the date of the MS4 checklist transmittal letter, CVTC is requested to provide the total number of outfalls screened through the Preventative Maintenance Program.*

**CVTC Response:**

On a semi-annual basis, the Physical Plant Department inspects all storm drain inlets (approx. 90) for the collection of debris and litter, including tree limbs. All outfalls are examined for changes such as any indications of dying vegetation, excessive build-ups of sediments and solids, as well as examine all outfalls for excessive soil erosion. Due to budget constraints and the closure plan for the facility in 2020, major repair projects concerning repairs of outfalls are not planned unless excessive deterioration of an outfall is evident.

**II.B.3.f(3)**

A summary of each investigation conducted by the operator of any suspected illicit discharge. The summary must include: (i) the date that the suspected discharge was observed, reported, or both; (ii) how the investigation was resolved, including any follow-up, and (iii) resolution of the investigation and the date the investigation was closed.

**AR Comments:** Annual report states that one sewer leak occurred on April 9, 2014 due to a clog.

**Program Comments:** *Within 14 days of the date of the MS4 checklist transmittal letter, CVTC is requested to provide date the investigation was resolved, any follow-up action, and the date the investigation was closed*

**CVTC Response:**

On April 9, 2014, a clogged sanitary sewer manhole caused inconsequential flooding of sanitary sewage onto the ground surface and into to a nearby storm inlet, adjacent to CVTC's building number 11. The clog was identified as wash cloths; these cloths were removed and the sanitary lines were jetted. The Department of Environmental Quality was

notified immediately. Following the notification to DEQ, a powdered lime treatment was applied to the affected area to eliminate any threat of noxious odors resulting from the overflow. The incident was corrected and completed closed out on April 10, 2014.

#### **Permit Requirements MCM 4 – Construction Site Stormwater Runoff Control**

E&S program found to be consistent in last program review, or facility operating under approved annual standards and specifications.

**Date of Program Review or Annual Standards approval:**

**Program Comments:** No annual standards and specifications are on file. No program review on file.

#### ***CVTC Response:***

On September 10, 2014, a site inspection report was issued by the Department of Environmental Quality to C.L. Lewis & Co., Inc., in which the construction site for Central Virginia Training Center's building #10 renovation project, was found to be in non-compliance concerning erosion and sediment control stabilization measures. The construction professional design team submitted an Erosion and Sediment Control plan to DEQ, October 28, 2014; this plan was reviewed and conditionally approved as evident by correspondence issued by DEQ dated October 30, 2014.

#### **Permit Requirements MCM 6 – Pollution Prevention/Good Housekeeping for Municipal Operations**

##### **II.B.6.g(1)**

A summary report on the development and implementation of the daily operational procedures.

**AR Comments:** The Annual Report states that it will develop procedures for materials and storage handling. No summary is given for the development and implementation of the daily operating procedures.

**Program Comments:** *Within 14 days of the date of the MS4 checklist transmittal letter, CVTC is requested to provide a summary report on the development and implementation of the daily operational procedures.*

#### ***CVTC Response:***

CVTC maintains a contract with Environmental Options, Inc. to remove and recycle, to the fullest extent possible (if materials cannot be recycled, they are properly disposed), all waste oil, antifreeze, tires, batteries, lighting ballasts possibly contaminated by PCP's and refrigerants. Inconsequential sand and salt stock piles are covered with tarps to protect erodible material from the elements/precipitation. CVTC also employs in its Physical Plant Services Department a full-time auto mechanic team that performs daily preventative maintenance tasks and inspections to insure all 90 plus fleet vehicles and operational equipment (backhoe, tractors, loader etc.) are properly maintained to prevent excessive lubricant leaks that could have negative impacts on storm water.

### **II.B.6g(2)**

A summary report on the development and implementation of the required SWPPPs.

**AR Comments:** A summary report on the development and implementation of the required SWPPPs is not addressed in the Annual Report.

**Program Comments:** *Within 14 days of the date of the MS4 checklist transmittal letter, CVTC is requested to provide a summary report on the development and implementation of the required SWPPPs. Information regarding types of facilities requiring SWPPPs can be found in II.B.6b(1)(2).*

#### **CVTC Response:**

CVTC does not have any high-priority facilities having a high potential for chemical or other harmful materials to be discharged in storm water. Daily operational guidelines have been addressed in previous sections of this report concerning BMP's, including but not limited to, landscape nutrient management and handling/storage of hazardous materials. As mentioned previously, CVTC intends to train its Physical Plant Services employees for procedures involving ODCP; the number of employees attending this training is approximately 15. The training will be facilitated on-site by the Engineering and Environmental Division of the Cardno Company.

### **II.B.6.g(3)**

A summary report on the development and implementation of the turf and landscape nutrient management plans that includes;

- a. The total acreage of lands where turf and landscape nutrient management plans are required.
- b. The acreage of lands upon which turf and landscape nutrient management plans have been implemented.

**AR Comments:** CVTC has an approved Nutrient Management Plan (5/15/2013). A summary report was not provided in the annual report.

**Program Comments:** *Within 14 days of the date of the MS4 checklist transmittal letter, CVTC is requested to provide the total acreage of lands where turf and landscape nutrient management plans are required and have been implemented.*

#### **CVTC Response:**

An approved nutrient management plan remains in effect for CVTC's campus grounds. However, due to budget constraints and the plan for the facility closure in the year 2020, CVTC has not applied any nutrient management chemicals. For this reason, random soil samples to insure nutrient application rates were not exceeded were not performed.

### **II.B.6.g(4)**

A summary report on the required training, including a list of training events, the training date, the number of employees attending training and the objective of the training.

**AR Comments:** Annual report states that CVTC trained 1225 staff in PY1. Training is only called "environmental awareness training".

**Program Comments:** *Within 14 days of the date of the MS4 checklist transmittal letter, CVTC is requested to provide a list of training events, the training dates and the objective of the training.*

**CVTC Response:**

1. A training class titled “Storm Water Management,” developed in-house by the Physical Plant Services Department, was implemented in which approximately 1200 CVTC staff members were required to participate via CVTC’s Learning Management System. This training was required to be complete in the 2<sup>nd</sup> quarter of LMS, in which the class completion requirement date was March 30, 2014. This class provided awareness concerning the negative impact on storm water and the environment concerning illicit discharges. The class also provided a phone number and contact department to report any possible identifiable illicit discharges into storm water and/or water bodies.
2. Two Physical Plant Services Department staff members attended a one-day workshop on September 17, 2013, sponsored by the Virginia Cooperative Extension. The class was titled “Water Quality Focus of Landowner Workshop,” and focused on landowner activities that can affect the quality of our water and how to protect this vital resource.

**MS4 Program Plan Updates Due 12 Months After Permit Coverage – Submitted 10/1/2014 (note: newly designated MS4s may have different submittal schedules)**

Public Education Outreach Plan (Minimum Control Measure 1 – Public Education and Outreach on Stormwater Impacts).

**AR Comments:** Program Plan was not significantly altered from previous years. It was not updated to meet the current permit requirements.

**Program Comments:** *Program Plan was not updated to meet the conditions of this permit in accordance with Table 1.*

**CVTC Response:**

Updates to BMP Categories involving Public Education and Outreach on Storm water Impacts has been covered in previous sections of this report.

Illicit Discharge Procedures - (Minimum Control Measure 3 – Illicit Discharge Detection and Elimination).

**AR Comments:** Program Plan does not include Illicit Discharge Procedures.

**Program Comments:** *Program Plan was not updated to include all procedures developed by the operator to detect, identify and address nonstormwater discharges to the MS4 in accordance with the schedule given in Table 1.*

**CVTC Response:**

CVTC has implemented several specific procedures to detect, identify and protect storm water. The procedures include education on how to identify illicit discharges (education is previously covered in this report); a preventative maintenance schedule for the inspection of all outfalls; and a phone number (434-947-6300) that is provided in the training and also posted on CVTC’s website for reporting of illicit discharges.

Operator-Owned Stormwater Management Inspection Procedures (Minimum Control Measure 5 – Post-Construction Stormwater Management in New Development and Development on Prior Developed Lands).

**AR Comments:** Program plan states a program is in place for periodic inspection and maintenance controls for post construction measures.

**Program Comments:** *Program Plan was not updated to include written procedures for inspection and maintenance of operator-owned stormwater management facilities.*

**CVTC Response:**

CVTC's construction/renovation efforts have not resulted in additional storm water outfalls. E&S control measures were mentioned previously in this report concerning renovations to building #10 and are inspected via an assigned site inspector. Current preventative maintenance scheduled tasks cover post construction storm water management.

Identification of Locations Requiring SWPPPs (Minimum Control Measure 6 – Pollution Prevention/Good Housekeeping for Municipal Operations).

**AR Comments:** Program Plan does not address the identification of locations requiring SWPPPs.

**Program Comments:** *Program Plan was not updated to include facilities requiring a SWPPP*

**CVTC Response:**

CVTC does not currently have any additions to it campus which requires additional Storm Water Pollution Prevention Plan. The current active construction project, building 10, located on CVTC's campus, required and Erosion and Sediment Control Plan which was submitted and conditionally approved on October 30, 2014.

Training Schedule and Program - (Minimum Control Measure 6 – Pollution Prevention/Good Housekeeping for Municipal Operations).

**AR Comments:** Program plan states that it will continue to provide training on environmental awareness.

**Program Comments:** *Program Plan was not updated to include the annual written training plan for the next reporting cycle*

**CVTC Response:**

Appropriate CVTC staff members are to participate in training on pollution prevention and good housekeeping practices for MS4 participants for plan years 2 and 4. Targeted employees will be those involved in parking lot maintenance, storm water outfalls and inlet maintenance, Oil Discharge Contingency daily and weekly established inspections, fleet maintenance and transportation operators that actively fuel vehicles on a daily basis.

The City of Lynchburg has agreed to sponsor training to include a DVD production by Excal Visual LLP., titled: *Rain Check – Storm Water Pollution Prevention for MS4*, that will cover various best management practices and show employees how to practice good

housekeeping practices such as spill response, vehicle fueling and maintenance materials management.

The Physical Plant Department will also implement and administer an “in house,” standard operating procedure training session to cover Pollution Prevention Water Quality and Good Housekeeping measures. The procedures will cover BMP maintenance criteria, vehicle storage, petroleum/chemical handling, spill response and good housekeeping items.

Documentation of the training sessions and attendees will be forwarded to CVTC’s Staff Development and Training Department for transcript records.



# COMMONWEALTH of VIRGINIA

Molly Joseph Ward  
Secretary of Natural Resources

DEPARTMENT OF ENVIRONMENTAL QUALITY  
Blue Ridge Regional Office  
[www.deq.virginia.gov](http://www.deq.virginia.gov)

David K. Paylor  
Director

Robert J. Weld  
Regional Director

**Lynchburg Office**  
7705 Timberlake Road  
Lynchburg, Virginia 24502  
(434) 582-5120  
Fax (434) 582-5125

**Roanoke Office**  
3019 Peters Creek Road  
Roanoke, Virginia 24019  
(540) 562-6700  
Fax (540) 562-6725

May 12, 2015

Mr. Richard Hall  
Physical Plan Director  
Central Virginia Training Center  
521 Colony Road  
Madison Heights, Virginia 24521

**RE: VAR040121, MS4 Permit, Central Virginia Training Center, Madison Heights, Virginia  
2014 MS4 Annual Report Review -- Report Accepted**

Dear Mr. Hall:

On September 25, 2014, the Virginia Department of Environmental Quality (DEQ) received Central Virginia Training Center's 2014 MS4 Annual Report submitted in accordance with its "General Permit for Discharges of Stormwater from Small Municipal Separate Storm Sewer Systems" (MS4 Permit). Annual report revisions were received May 11, 2015.

Central Virginia Training Center's "2014 MS4 Annual Report", revised as noted above, is accepted. The attached checklist reflects revisions submitted by the center.

If you have any questions, please contact me at 434-485-3979 or [bridget.winks@deq.virginia.gov](mailto:bridget.winks@deq.virginia.gov).

Sincerely,

A handwritten signature in cursive script that reads "B. Amanda Winks".

B. Amanda Winks  
Stormwater Compliance Specialist

cc: Cody Boggs, DEQ-BRRO (*via e-mail*)