



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, Pennsylvania 19103-2852

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): July 19, 2022
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Municipal Stormwater
Site/Facility Name: J. Sargeant Reynolds Community College MS4
Permittee(s): J. Sargeant Reynolds Community College MS4
Site/Facility Address: 1651 East Parham Road, Richmond, VA 23228
Latitude: 37°38'17.50" N **Longitude:** 77°28'27.23" W
County/Parish: Henrico County
General Permit #: VAR04
Specific Permit #: VAR040107
NAICS Code: 924110 **SIC:** 9511
Unique Project #: 3E22WN093A

MS4 Representative(s): **Point of Contact**

Mathew E. Thompson, Sr., Buildings & Grounds Manager
J. Sargeant Reynolds Community College
Phone: (804) 523-5795 Email: MThompson@Reynolds.edu
Donald Pollard, Grounds Supervisor
J. Sargeant Reynolds Community College
Phone: (804) 523-5593 Email: DPollard@Reynolds.edu



EPA Inspectors:

Ingrid Hopkins
Phone: (215) 814-5437 Email: Hopkins.Ingrid@epa.gov
Chuck Schadel
Phone: (215) 814-5761 Email: Schadel.Chuck@epa.gov

State/Local Inspectors:

Jeff Selengut, Virginia Department of Environmental Protection
Phone: (804) 659-1314 Email: Jeffrey.Selengut@deq.virginia.gov
Shana Moore, Virginia Department of Environmental Protection
Phone: (804) 814-6954 Email: Shana.Moore@deq.virginia.gov

Report Preparer	Ingrid Hopkins, Inspector	Date
Signature/Date	NPDES Section (3ED32)	
Supervisor	Michael Greenwald, Acting Section Chief	Date
Signature/Date	NPDES Section (3ED32)	

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List of Attachments

Attachment 1:	The NPDES MS4 Permit
Attachment 2:	2021 Annual Report
Attachment 3:	2021 MS4 Program Plan
Attachment 4:	2021 Annual Inspection Report
Attachment 5:	Photo Log
Attachment 6:	As-built Plans
Attachment 7:	SWPPP Assessment

I. Introduction

On July 19, 2022, authorized inspectors from the U.S. Environmental Protection Agency (EPA) Region III (hereinafter, "EPA Inspection Team") met with representatives of the Virginia Department of Environmental Protection (VADEQ) at the J. Sargeant Reynolds Community College (JSRCC) municipal maintenance facility. The primary purpose of the inspection was to evaluate JSRCC's Municipal Separate Storm Sewer System (MS4) program for compliance with their Virginia Pollutant Discharge Elimination System ("VPDES") Permit No. VAR040107. J. Sargeant Reynolds Community College is identified as the Permittee (hereinafter, "JSRCC" or "the College").

Prior to the inspection the EPA Inspection Team reviewed the Attachment 1 - "GENERAL VPDES PERMIT FOR DISCHARGES OF STORMWATER FROM SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEMS (11/1/2018 - 10/31/2023)" or the "Permit" and Attachment 2 - "the 2021 MS4 Annual Report". The Inspection Team also requested and reviewed the Attachment 3 - "Municipal Separate Storm Sewer System Program Plan (9/21/21)", as well as Attachment 4 - "Municipal Separate Storm Sewer System Annual Inspections (2020-2021)" for the College.

As part of the inspection, the Inspection Team reviewed efforts regarding minimum control measures for illicit discharge detection and elimination; post-construction stormwater management; and pollution prevention and good housekeeping for facilities owned or operated by the College within the MS4 service area, as well as the College's Annual Reports. The EPA Inspection Team inspected three post construction stormwater management facilities that were selected by the EPA Inspection Team prior to the inspection and one of the College's maintenance yards.

The photographs (Attachment 6 - "Photo Log") for this report have been processed in order to assign to each photo the original camera-generated file name (e.g., IMAG0032) and the date and time the photo was taken (e.g., 2022-03-19--15.53.01). The camera-generated file name is used to identify each photo in the main narrative of this inspection report. Unused photos are digitally stored and maintained in the inspection file. Unused photos are available upon request.

Attachment 7 - "SWPPP Assessment" is the assessment that JSRCC conducted in order to determine whether or not a Storm Water Pollution Prevention Plan (SWPPP) is required under the Permit.

A. Inspection Opening Conference

The EPA Inspection Team arrived at JSRCC's maintenance facility at approximately 9:00 AM. The EPA Inspection Team identified themselves to JSRCC representatives and displayed

their credentials. The EPA Inspection Team explained the purpose of the inspection was to determine JSRCC's compliance with the requirements of its NPDES Permit, VAR040107.

The EPA Inspection Team, with JSRCC representatives in attendance, proceeded to inspect the facility and three structural BMPs. The EPA Inspection Team's observations are listed later in this document and are grouped by type of observation.

B. Weather and Precipitation Conditions

During the inspection, the weather was sunny with a high temperature of 90 F. National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the date of the inspection and 5 days prior are provided in the table below:

PRECIPITATION

Station Name	Date	Precipitation Amount (inches)¹
PETERSBURG, VA US USC00446656	7/14/22	0.00
PETERSBURG, VA US USC00446656	7/15/22	0.86
PETERSBURG, VA US USC00446656	7/16/22	0.07
PETERSBURG, VA US USC00446656	7/17/22	0.03
PETERSBURG, VA US USC00446656	7/18/22	0.00
PETERSBURG, VA US USC00446656	7/19/22	0.00

II. MS4 Activity

JSRCC is a community college in Virginia and is a member of the Virginia Community College System. The college currently offers 25 two-year occupational/technical degree programs, 9 occupational/technical certificate programs, 5 two-year college transfer programs, and 41 career studies certificate programs requiring less than one-year of full-time study. 97% of the college's programs offer at least one class through distance learning. In September 1974, the Parham Road Campus opened in a newly constructed, contemporary building located on a 105-acre (0.42 km²) site in northern Henrico County. A second instructional building was completed on this suburban campus in time for the opening of classes in the fall of 1980. A three-story structure adjacent to the Parham Road Campus houses executive and central administrative offices. In all of 2008, the Parham campus opened the Massey Library Technology Center, named for Ivor & Maureen Massey.

JSRCC owns and operates an MS4 that consists of manmade and natural components of a stormwater management infrastructure to both limit and manage the volume of stormwater to mitigate flood events and to minimize degradation of the College waterways through stormwater quality management. Existing regulated outfalls will be identified for annual inspection and illicit discharge tracking. The College is authorized to discharge stormwater runoff from the

¹ Source: NOAA National Climatic Data Center (<http://www.ncdc.noaa.gov/>).

campus MS4 under the Virginia Stormwater Management Program (VSMP) regulations and a Virginia Pollutant Discharge Elimination System Permit.

III. Observations

The EPA Inspection Team conducted inspections of the JSRCC municipal maintenance facility and three post construction stormwater management facilities. The observations made by the EPA Inspection Team are identified below.

MCM 3 - Illicit Discharges

The Permit, Part 1, requires -

3. Illicit discharge detection and elimination ...
 - b) If the total number of MS4 outfalls is equal to or less than 50, a schedule to screen all outfalls annually;

Observation #1:

JSRCC provided the EPA Inspection Team with Attachment 2, its Municipal Separate Storm Sewer System Annual Report (July 1, 2020 to June 30, 2021) which describes their efforts regarding illicit discharge detection and elimination. According to Attachment 2, all outfall screenings required by the Permit were completed and no illicit discharges were found during the July 1, 2020 to June 30, 2021 reporting period.

MCM 5 - Post-construction Stormwater Management Facilities

The Permit, Part 1 requires -

5. Post-construction stormwater management for new development and development on prior developed lands
 - a. The permittee shall address post-construction stormwater runoff that enters the MS4 from the following land disturbing activities by implementing a post-construction stormwater runoff management program as follows:
 - b. The permittee shall implement an inspection and maintenance program for those stormwater management facilities owned or operated by the permittee that discharges to the MS4 as follows:
 - (2) The permittee shall inspect stormwater management facilities owned or operated by the permittee no less than once per year. The permittee may choose to implement an alternative schedule to inspect these stormwater management facilities based on facility type and expected maintenance needs provided that the alternative schedule and rationale is included in the MS4 program plan. The alternative inspection frequency shall be no less than once per five years;

Observation #2:

JSRCC provided the EPA Inspection Team with Attachment 2, its Municipal Separate Storm Sewer System Annual Report (July 1, 2020 to June 30, 2021) which describes their efforts regarding post-construction stormwater management facilities. According to Attachment 2, all post construction stormwater management facility inspections that are required by the Permit were completed during the July 1, 2020 to June 30, 2021 reporting period.

Observation #3:

The as-built plans for the BMPs were requested and reviewed by the EPA Inspection Team prior to the inspection. The EPA Inspection Team inspected three BMPs (BMP#3; BMP #4 and BMP #5) located within the JSRCC campus. Based on observations made during the inspection, it appeared that BMP #3 and BMP #5 were constructed at the location recorded in Attachment 2 and configured as presented on the as-built plan. However, the as-built plan and the JSRCC MS4 BMP Inventory lists BMP #3 as a dry stormwater management pond. According to Reynold staff, it was realized recently that BMP #3 was constructed incorrectly (as a wet pond). Reynolds staff indicated that discussion with VADEQ regarding the re-characterization of the BMP is on-going. No erosion was observed at any of the three inspected BMPs. Refer to ATTACHMENT 5 - Photo Log for photographs taken during the inspection.

For photographs pertaining to BMP #3, refer to: P7190033, P7190034, P7190037 and P7190038.

For photographs pertaining to BMP #4, refer to: P7190039, P7190041 and P7190042.

For photographs pertaining to BMP #5, refer to: P7190026, P7190027 and P7190029 through P7190032.

MCM 6 - Good Housekeeping

The Permit, Part 1 requires -

6. Pollution prevention and good housekeeping for facilities owned or operated by the permittee within the MS4 service area.
 - a. The permittee shall maintain and implement written procedures for those activities at facilities owned or operated by the permittee, such as road, street, and parking lot maintenance; equipment maintenance; and the application, storage, transport, and disposal of pesticides, herbicides, and fertilizers designed to:
 - (6) Prevent pollutant discharge into the MS4 from leaking municipal automobiles and equipment;

Observation #4:

Photographs of the maintenance facility that display controls put in place by JSRCC include photographs P7190005 through P7190012; P7190014 through P7190016; and P7190020.

Additional interest pertains to photographs P7190012, P7190017 and P7190022 regarding what appears to be petroleum-related ground staining.

Additional interest pertains to photograph P7190021 due to what appears to be a lack of controls.

The Permit, Part 1 requires -

- e. No later than June 30 of each year, the permittee shall annually 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 as described in Part I, E.6.c. If the facility is determined to be a high-priority facility with a high potential to discharge pollutants, the permittee shall develop a SWPPP meeting the requirements of Part I, E.6.d. no later than December 31 of that same year.

Observation #5:

JSRCC has conducted a review (Attachment 7 - "SWPPP Assessment") of its maintenance facility in accordance with the Permit and determined that a Stormwater Pollution Prevention Plan is not warranted.

The Permit, Part 1 requires -

- m. The permittee shall develop a training plan in writing for applicable staff that ensures the following:
 - (2) Employees performing road, street, and parking lot maintenance receive training in pollution prevention and good housekeeping associated with those activities no less than once per 24 months;

Observation #6:

The 2021 Annual Report (Attachment 2), indicates that JSRCC conducted pollution prevention and good housekeeping training for its staff for the reporting period, July 1, 2020 through June 30, 2021.

IV. Records Review

As part of this inspection, the EPA Inspection Team reviewed the documents identified in the List of Attachments at Page 2 of this report.

V. Closing Conference

At conclusion of the field inspection, the EPA Inspection Team conducted a closing conference with JSRCC representatives and shared preliminary observations. The EPA Inspection Team reiterated to JSRCC representatives that all preliminary observations discussed were not compliance determinations. Preliminary observations shared with the JSRCC are subject to further review by EPA, including additional review of records and documentation. As a result, additional observations may be contained in this inspection report that were not identified at the time of the closing conference.

The inspection concluded at approximately 10:30 AM (EDT).