

RADFORD UNIVERSITY



MS4 ANNUAL REPORT

JULY 1, 2021-JUNE 30, 2022

Certification Statements and Requirements

As required by 9VAC25-870-370 B, all reports required by state permits, and other information requested by the board shall be signed by a responsible official or by a duly authorized representative of that person. A responsible official is:

- 1. For a corporation: by a responsible corporate officer. For the purpose of this section, a responsible corporate officer means: (i) a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy-making or decision-making function; for the corporation, or (ii) the manager of one or more manufacturing, production, or operating facilities, provided the manager is authorized to make management decisions that govern the operation of the regulated facility, including having the explicit or implicit duty of making major capital investment recommendations, and initiating and directing other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; the manager can ensure that the necessary systems are established or actions taken to gather complete and accurate information for state permit application requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures;*
- 2. For a partnership or sole proprietorship: by a general partner or the proprietor, respectively; or*
- 3. For a municipality, state, federal, or other public agency: by either a principal executive officer or ranking elected official. For purposes of this section, a principal executive officer of a federal agency includes (i) the chief executive officer of the agency, or (ii) a senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency.*

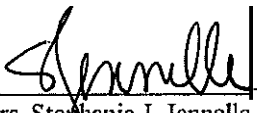
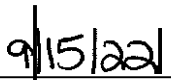
Duly Authorized Representatives

A person is a duly authorized representative only if:

- 1. The authorization is made in writing by a person described below;*
- 2. The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company. A duly authorized representative may thus be either a named individual or any individual occupying a named position; and*
- 3. The written authorization is submitted to the department.*

CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

	
Mrs. Stephanie J. Jennelle	Date

Interim VP for Finance and
Administration & Chief Financial Officer Radford University
Permit No. VAR040136; Radford University

MS4 Annual Report July 1, 2021 through June 30, 2022

Table of Contents

Program Plan - Changes to the program plan	Page 3
Minimum Control Measure No. 1: Public Education and Outreach	Page 3
Minimum Control Measure No. 2: Public Participation/Involvement	Page 4
Minimum Control Measure No. 3: Illicit Discharge Detection and Elimination	Page 5
Minimum Control Measure No. 4: Construction Site Runoff Control	Page 6
Minimum Control Measure No. 5: Post-Construction Runoff Control	Page 6
Minimum Control Measure No. 6: Pollution Prevention/Good Housekeeping	Page 7
Appendices	Page 9
Appendix A	Page 10
Appendix B	Page 15
Appendix C	Page 17
Appendix D	Page 18
Appendix E	Page 19

Program Plan

Changes to the program plan during the reporting year July 1, 2021 - June 30, 2022

1. Changes to Section 2: Administration

- Changed the person primarily responsible for coordinating, educating and reporting for compliance with the MS4 General Permit from the "Recycling Coordinator" to "Construction Project Manager"
- Updated the organizational chart to reflect the following changes
 - Chad A. Reed to Stephanie J. Jennelle
 - Robert Harrison to Jennifer Hendrix
 - Mike Biscotte to Rick Farthing
 - Robert Dunn to Wayne Hebb
- Updated Section 2.2 Responsible Party Contact Information to reflect the updated organizational chart (the correct job titles and contact information will also be added to reflect the changes).

Minimum Control Measure No. 1: Public Education and Outreach

Annual Reporting Requirements

Per VAR040136 MCM 1, g. The annual report shall include:

1. A list of the high-priority stormwater issues the permittee addressed in the public education and outreach program

- Vehicle Maintenance (Petroleum Releases)
- Trash Elimination and Recycling
- Pet Waste

2. A list of the strategies used to communicate each high-priority stormwater issues:

- Vehicle Maintenance (Petroleum Release)

During the 2021-2022 reporting period, the educational video had 2 visitors. Radford University did not have a booth at the Campus Club Fair and as such did not hand out flyers pertaining to vehicle maintenance. The flyers were present on the MS4 website and had a total of 24 visitors. The facilities department had 8 calls during the reporting period to clean up a petroleum-based spill.

- Evaluation: An increase in water quality can be expected by educating the public on how to properly maintain their vehicle to prevent leaking pollutants and on how to dispose of pollutants so they do not end up in the waterways. Radford University will track the numbers of individual views of the vehicle maintenance educational video located on the MS4 page of the university website and the number of flyers handed out at various events. Since the video had a very small number of views when compared to the total number of visitors to the MS4 page, it is necessary for Radford University to look for additional ways to get the educational material to a larger audience. Radford University will regularly review reports of petroleum spill clean ups to determine if it is necessary to adjust the strategy.
- Trash Elimination and Recycling

During the 2021-2022 reporting period, Radford University did not have a booth at the Campus Club Fair and as such did not hand out flyers pertaining to Trash Elimination and Recycling. The flyers were still present on the University's MS4 website and had a total of 24 visitors. The facilities department has the trash/recycling removal on a regular schedule, but received 15 calls during the reporting period concerning excess

trash/recycling materials. The calls were mostly caused by the excess waste from events or when students are moving into the dorms.

- Evaluation: Educating the public on recycling and proper trash disposal is expected to continue to have a variety of positive impacts to the Radford University campus. Radford University will track any emails or calls to the Facilities Department to determine if changes need to be made to the way the University educates the campus community. Radford University will also look to continue to improve on how the material is distributed so we are able to reach the largest audience.
- Pet Waste
 - Evaluation: A decrease in pet waste entering the Radford University storm sewer system is expected by staying vigilant in educating the campus community. Radford University will track any incoming emails and calls to the Facility Department to get suggestions from the public. We will also, continue to watch the number of visits to the websites and number of flyers handed out to get an idea of how many people we are reaching. Radford University will continue to look for new ways to reach the largest audience with our educational materials.

Minimum Control Measure No. 2: Public Participation/Involvement

Annual Reporting Requirements

Per VARO40136 MCM 2, f. MS4 Annual Report shall include:

1. *A summary of any public input on the MS4 program received (including stormwater complaints) and how the permittee responded:*

- No public input was received during the reporting period of July 2021- June 2022

2. *A webpage address to the permittee's MS4 program and stormwater website:*

- Radford University's MS4 Webpage can be found at:
<https://www.radford.edu/content/sustainability/home/resources/stormwater-management.html>

3. *A description of the public involvement activities implemented by the permittee:*

Radford University participated in the following public involvement activities:

- The annual "Renew the New" every August. (**Restoration**)
- Booth at the campus club fair in August (**Education**) (No booth was supported during the 2020- 2021 reporting year, but the MS4 team plans to have a MS4/Stormwater Educational booth for the 2022-2023 reporting year)
- Household hazardous waste in April. (**Disposal**) (During the reporting period, this event was held at the New River Resource Authority. Radford University has reached out and plans to help in any way possible)
- Storm drain marking program (**Pollution Prevention**) The MS4 team included trying to get the public involved in watching for missing Storm drain medallions in the MS4 Program Plan after an audit in 2022. There have been zero calls/emails from the public concerning missing medallions. The MS4 Team will likely remove the Storm Drain Marking Program from the MS4 Program and replace it with another Public Participation item.

4. *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:*

- Public engagement continues to be a major priority for improving water quality on campus and around the community. All of the different things we participate in focuses on educating our Faculty, Staff and Students and giving them a measurable way, by which, they can help protect our nearest major waterway, the New River.
 - "Renew the New" – Radford University uses the number of volunteers and the amount of garbage collected to determine if this event is beneficial in improving water quality. In 2021 alone, 589 volunteers collected 5 tons of garbage and

114 tires. During the 2021-2022 reporting period, the RU MS4 team did not advertise this event, however because of the popularity of the event, it was a success. In speaking with the group that organizes the event, I learned that they had a typical number of volunteers, but the totals have not been reported as of the submission of this report.

- Evaluation: This event has been successful since 2007 and continues to be a direct way to improve water quality in the area. The Radford University MS4 team will advertise the event and continue to look for other ways to get the largest number of volunteers as possible.
- Campus Club Fair booth – The MS4 team did not participate in the Campus Club Fair during this reporting period. We still feel that this is the best method of reaching the largest number of individuals within the campus community.
 - Evaluation: The Campus Club Fair is one of the largest gatherings of students, faculty and staff through the year. The Club Fair is a good place to get educational material to as many members of the Radford University community. The MS4 team will continue to watch for other events that allow the distribution of educational materials.
- Storm drain marking program – The facilities department at Radford University located and replaced 5 missing medallions.
 - Evaluation: While Radford University believes that there is a benefit to continuing the Storm Drain Marking Program by doing periodic inspections and replacing any medallions that are missing, we do not believe the public will get involved as proposed in the updated program plan. This will need to be addressed in the new program plan that is scheduled to be submitted in 2023.

5. *The name of other MS4 permittees with whom the permittee collaborated in the public involvement opportunities:*

- City of Radford
- Town of Blacksburg

Minimum Control Measure No. 3: Illicit Discharge Detection and Elimination

Annual Reporting Requirements

Per VAR040136 MCM 3, e. annual report shall include:

1. *A 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:*

- The MS4 map and information table were updated to reflect the changes to the MS4 during the reporting period. See Appendix B.
- Information can also be accessed through Radford University's MS4 website <https://www.radford.edu/content/sustainability/home/resources/stormwater-management.html>

2. *The total number of outfalls screened during the reporting period as part of the dry weather screening program:*

- 34 Outfalls were screened as part of the dry weather screening program. Since Radford University has less than 50 Outfalls, they are each screened annually.
- See Appendix B
- Information can also be accessed through Radford University's MS4 website <https://www.radford.edu/content/sustainability/home/resources/stormwater-management.html>

3. *A list of illicit discharges to the MS4 including spills reaching the MS4 with information as follows:*

- (a) The source of illicit discharge;
- (b) The dates that the discharge was observed, reported, or bath;
- (c) Whether the discharge was discovered by the permittee during dry weather screening, reported by the public, or other method;
- (d) How the investigation was resolved;
- (e) A description of any follow-up activities; and
- (f) The date the investigation was closed.
 - No illicit discharges or spills were reported this year.

Minimum Control Measure No. 4: Construction Site Runoff Control

Annual Reporting Requirements

Per VAR040136 Part 1 MCM 4, d. The annual report shall include:

1. *If the permittee implements a construction site stormwater runoff program in accordance with Part IE 4 a {3}:*

- A confirmation statement that land disturbing projects that occurred during the reporting period have been conducted in accordance with the current department approved standards and specifications for erosion and sediment control:
 - Radford University confirms all land-disturbing projects that occurred during the reporting period have been conducted in conformance with Radford University's Annual Standards and Specifications for Erosion and Sediment Control and Stormwater Management (AS&S), as approved by DEQ.
 - See Appendix C
- If one or more of the land disturbing projects were not conducted with the department approved standards and specifications, an explanation as to why the projects did not conform to the approved standards and specifications.
 - All land disturbing projects were conducted in compliance with approved standards and specifications.
 - See Appendix C

2. *Total number of inspections conducted:*

- Radford University performed regular inspections as required by the Annual Standards and Specifications for Erosion and Sediment Control and Stormwater Management (AS&S). The CAIC project is still ongoing and a total of 66 inspections were performed between July 1, 2021 and June 30, 2022.
- See Appendix C

3. *The total number and type of enforcement actions implemented and the type of enforcement actions:*

- There were no enforcement actions implemented during the reporting period.
- See Appendix C

Minimum Control Measure No. 5: Post-Construction Stormwater Management

Annual Reporting Requirements

Per VAR040136 Part 1 MCM 5, i. The Annual Report will include:

1. *The permittee implements a Virginia Stormwater Management Program in accordance with Part I E 5 a (1) and (2):*

(a) *The number of privately-owned storm water management facility inspections Conducted:*

- Radford University has 11 BMP facilities on campus.

(b) *The number of enforcement actions initiated by the permittee to ensure long-term maintenance of privately-owned stormwater management facilities including the type of enforcement action:*

- Radford University had 0 enforcement actions during this reporting period.
- Please see Appendix D

2. *Total number of inspections conducted on stormwater management facilities owned or operated by the permittee:*

- During the reporting period, one complete inspection was performed on the Stormwater Management Facilities by Foresight Design Services.
- Please see Appendix D

3. A 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. This does not include routine activities such as grass mowing or trash collection:

- Radford University did not complete any maintenance, repair, or retrofit activities during the reporting period. The only maintenance activities necessary was grass and weed cutting.
- Please see Appendix D

4. A confirmation statement that the permittee submitted stormwater management facility information through the Virginia Construction Stormwater General Permit database for those land disturbing activities for which the permittee was required to obtain coverage:

under the General VPDES Permit for Discharges of Stormwater from Construction Activities in accordance with Part IE 5 for a statement that the permittee did not complete any projects requiring coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities:

- During the reporting period, July 1, 2021 – June 30, 2022, Radford University did not complete any projects requiring coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities.

5. A confirmation statement that the permittee electronically reported BMPs using the DEQ BMP Warehouse in accordance with Part IE 5 g and the date on which the information:

was submitted:

- During the reporting period, July 1, 2021 – June 30, 2022, Radford University did not complete any BMPs that would need reported to the DEQ BMP Warehouse.

Minimum Control Measure No. 6: Pollution Prevention/Good Housekeeping

Annual Reporting Requirements

Per VAR040136 Part 1 MCM 6, q. The Annual Report will include:

1. A summary of any operational procedures developed or modified in accordance with Part IE 6 a during the reporting period:

- April 2018 Thompson & Litton created and provided a SWPP for Radford University's Facilities, Maintenance and Operations Facility. These written procedures were designed to minimize or prevent pollutant discharge from daily operations, equipment maintenance, and the application, storage, transport, and disposal of pesticides, herbicides, and fertilizers. These written procedures are utilized, as part of employee training. There were no new developments or modifications made to these documents during this reporting period.

2. A summary of any new SWPPPs developed in accordance Part IE 6 c during the reporting period:

- There were no new SWPPPs developed during this reporting period, July 1, 2021 – June 30, 2022. The only project on campus that required a SWPPP is the CAIC Project. The SWPPP was prepared on June 11, 2021 and implemented on June 21, 2021.

3. A summary of any SWPPPs modified in accordance with Part IE 6 for the rationale of any high priority facilities delisted in accordance with Part IE 6 h during the reporting period:

- No SWPPPs were modified during this reporting period.

4. A summary of any new turf and landscape nutrient management plans developed that includes:

- There were no new Nutrient Management Plans developed during the reporting period of July 1, 2021 – June 30, 2022.

- Location and the total acreage of each land area
 - N/A
- The date of the approved nutrient management plan
 - The current nutrient management plan approved by the department of conversation and recreation is valid from June 1, 2021 - June 1, 2024.

5. A list of the training events conducted in accordance with Part IE 6 m, including the following information:

- The date of the training event;
- The number of employees who attended the training event; and
- The objective of the training event.

Radford University Stormwater Training			
Training Title	Objective	Training Date	Total Staff Trained
Pesticides/Herbicides Registered Technician	VCADS Certification	8/10/2022 and 10/22/2022	3
Pesticides/Herbicides Commercial Applicator	VCADS Certification	6/15/2022	1
Certified Fertilizer Applicator	VCADS Certification	Unknown	1
ESC Program Administrator	DEQ Certification	3/12/2022	1
SWM Program Administrator	DEQ Certification	3/4/2022	1

**The remaining training was not completed during the 2021-2022 reporting period.

Appendices



Appendix A

Radford University participates in Renew the New River volunteer effort

Radford University's student volunteers helped clean up the New River on August 28th, 2021. Students were invited to participate in the Giles County event, Fall into the New.



Renew the new river
New River Valley



14 likes

Renew the new river Fall into the New River Cleanup is happening all over the [#NRV](#) on August 28, 2021. Please join in on one of the efforts by RSVPing on renewthenew.org

Free t-shirt and lunch provided.

[#SWVA](#) [#GilesCoVa](#) [#ReNewtheNew](#) [#newriverwatertrail](#)

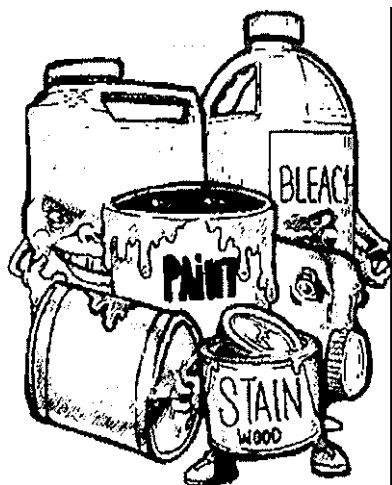
July 19, 2021

Radford University participates in Campus Club Fair



Club Fair is a huge event at Radford University. Hundreds of student organizations and campus departments gather together on Moffett Lawn to help students get connected at Radford. The event is held the first Friday of each semester. The MS4 team did not have a booth set up during the 2020- 2021 reporting period, but has plans to set up a booth at upcoming events.

Radford University participates in Regional Household Hazardous waste collection



NRV Regional Household Hazardous Waste Collection Day

Residents served by the New River Resource Authority are invited to participate in the Regions HHW & Document Shredding Event on September 11th, 2021 from 9:00 am to 2:00 pm.

Residents interested in this event will need to call NRRA at (540) 67 1677 to schedule an appointment. Event will be held at the New River Resource Authority, 7100 Cloyd's Mtn. Road, Dublin, VA 10 AM-2PM.

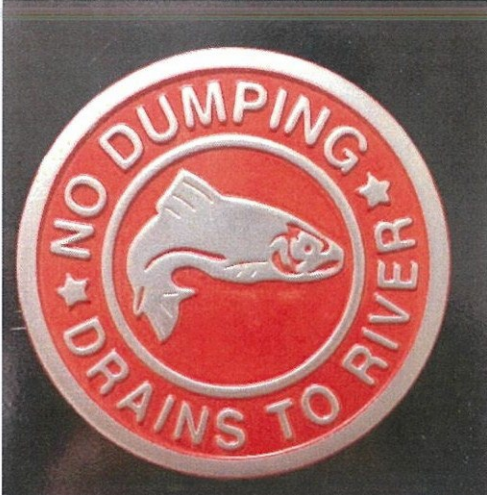
NOCOMMERCIAL WASTE or COMMERCIAL VEHICLES will be accepted for HHW

This program is sponsored by

The New River Resource Authority

This event was held at New River Resource Authority. Radford University's MS4 team is working to determine if there is something we can do to help facilitate the existing event or if it is necessary to organize a separate event on our campus.

Radford University participates in storm drain marking



Radford University continues to participate and is maintaining the "Storm Inlet Marking" program. This program involves labeling stormwater inlets, with a marker educating residents not to dump pollutants into the stormwater inlet. The message, "No Dumping, Drains to Waterways" is a simple phrase to remind those passing by that the stormwater Inlets connect to local waterways and that dumping will pollute those waters. During the outfall inspection that occurs in late May or early June, the storm drain inventory map is used to identify drains that empty into the river. These drains are identified with a "No Dumping" medallion. The Drain marking public participation is included IDDE training materials. During the annual inspection, the missing or damaged medallions are replaced.

Appendix B

Illicit Discharge Detection and Elimination

SUMMARY

The 34 outfalls listed on the ORI report were investigated on 6/29/2022 and 6/30/2022. This list includes the additional outfalls included last year from the recent acquisition of property to the University.

Of those new outfall locations acquired last year, many were determined to be simply gutter flow from the roofs to the street. Some of the new sites have inlets and pipe networks that carry the flow into the Radford City system, while others are a combination. There have been no overall changes to those systems this year.

Previous flow testing had revealed that the Fitness Center, Science and Humanities HVAC system discharges into the existing storm drainage system. This accounts for the various levels of ammonia detected at times from the units as the flow is monitored. Not every year the flow is detected but each time it is found, the flow is located at the same areas on campus.

This year no traces were detected from any flows coming from the Fitness Center or Humanities buildings. Flow was detected at the Science Building and recorded in flow from EM-2.

Significant rainfall events in previous years have caused the RU staff to focus on damage along the riverbanks instead of normal maintenance tasks. Locations around RU-NR-2 was significantly hit and damaged last year. Last year many of the repairs have been completed to restore the outfall areas and banks of the river. These areas will be continuously monitored throughout the coming year. This year, no signs of damage were observed at the outfall locations.

The university continues working on preliminary plans for a possible river work project that will help stabilize the entire area.

MAP CHANGES

None this year. The new ADS system for the CAIC facility is anticipated to be online within the 2024 year.

FLOW TESTS

RU-BU-2 stream flow tested with no indicators of illicit discharge.

RU-NR-1 stream flow tested with no indicators of illicit discharge.

RU-NR-5 stream flow tested with no indicators of illicit discharge.

RU-NR-7 stream flow tested with no indicators of illicit discharge.

RU-EM-2 Flow tests indicated no levels of Ammonia. Flow traced through campus to roof drains at the Science Building. Had Ammonia in previous years.

MAINTENANCE CONCERNS (On Radford University Property)

RU-AF-1, RU-NR-2, RU-EM-6, RU-TY-1, RU-NR-6, RU-NR- 4.5, RU-NS 5, Cleanup/debris

MAINTENANCE CONCERNS (Outfall on City Property, Contact Radford City)

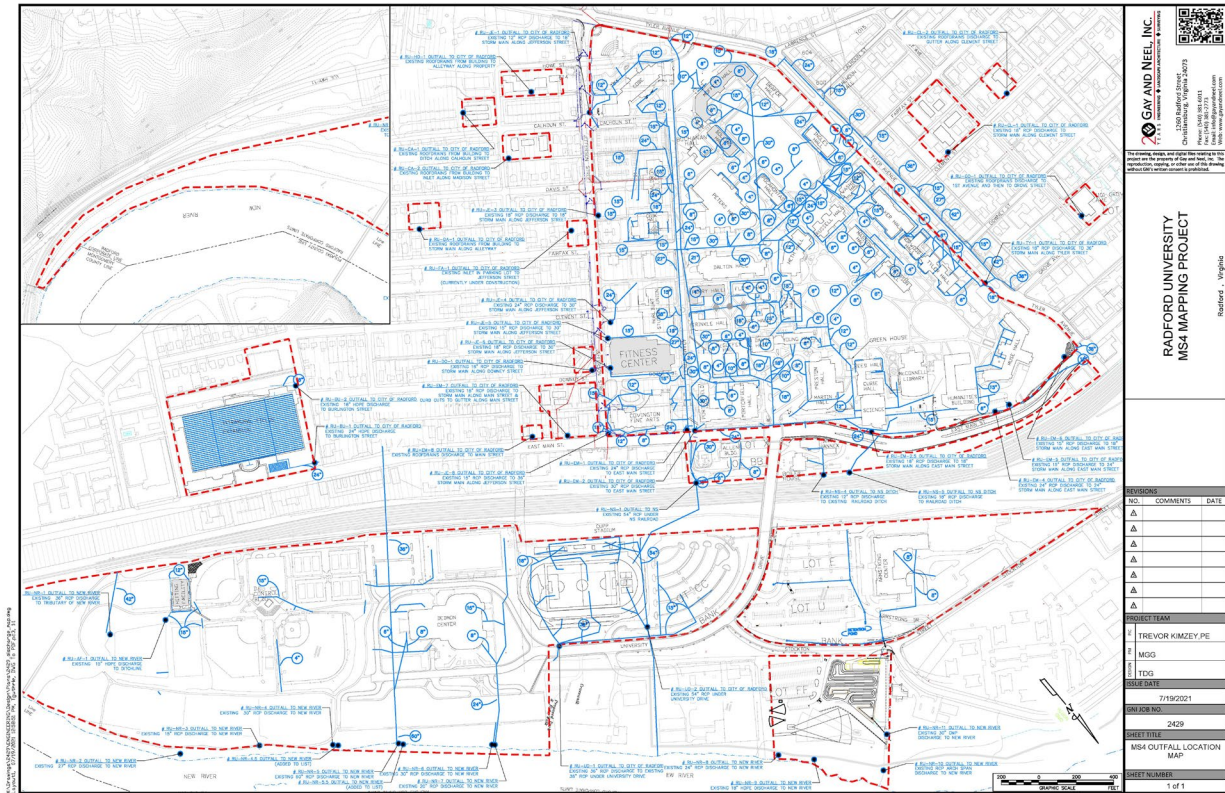
RU-NR-9, Maintenance/recommend Riprap

RU-EM-5, RU-NR-10, RU-JE-1, Cleanup/debris

INVESTIGATION NEEDED (More information needed on outfall and drainage basin)
RU-CA-2

Note all outfalls flows will ultimately be conveyed to the New River. Since 2010, DEQ has generated several ambient water column and sediment PCB data in support of total maximum daily loads (TMDLs) for PCB polychlorinated biphenyls (PCBs) in the New River.

Outfall watersheds should be monitored for sediment and chemical discharges that could increase the TMDL. Any possible sources should be investigated prior to an illicit discharge event. A DEQ Draft report dated 2017 is available for details on specific sources of PCBs.



2021 MS4 Outfall Location Map

Appendix C

Radford University Regulated Land-Disturbing Activities 1-Sep-22

RU will provide the following information on any regulated land-disturbing activity to DEQ Central Office no less than two weeks prior to the start of the activity:

- Project name or project number
 - Project location (including nearest intersection, latitude and longitude, access point)
 - On-site Project Manager and contact information
 - Responsible Land Disturber (RLD) name and contact information
 - Project description
 - Area of disturbance for the project
 - Estimated disturbed acreage for individual projects must be reported in the following manner:
 - o Linear Projects – beginning and ending coordinates, or
 - o Site Development – central to polygon or point coordinates
- Note: Coordinates may be reported by UTM (x, y, zone, and datum) or state plane (x, y, zone, and datum).
- Project start and finish date
 - Any variances/exemptions/waivers associated with this project

Project Name	Location	Project Manager Contact Information	RLD Contact Information	Project Description	Estimated Area	Estimated Start Date	Estimated Completion Date	Comments
Trail Connector	River Campus	Chris Shelton	N/A	Trail connecting to existing pedestrian walking trail	ES&C/SWM - less than 10,000 sq.ft.	May-22	Jun-22	
Draper Bus Pull Off	Main Campus	Chris Shelton	N/A	Create bus pull off along Tyler Ave at Draper Hall	ES&C/SWM - less than 10,000 sq.ft.	Oct-22	Nov-22	Designed by Dewberry
615 Fairfax Parking Lot		Chris Shelton	N/A	Expanded existing parking lotE	ES&C/SWM - less than 10,000 sq.ft.	Sep-22	Oct-22	
CAIC	Main Campus	Guy Rhodes grhodes2@radford.edu (540) 831-7756	TBD	New capital project and associated sitework	ES&C/SWM - 4.66 acres	Jul-21	Sep-24	Design by DAA ESC/SWM Plans and SWPPP by DAA Plan Review and Inspections by GNI

Annual Standards and Specifications for Erosion and Sediment Control and Stormwater Management can be found on the Radford University website at: https://www.radford.edu/content/dam/departments/administrative/Facilities-Planning/RU_Annual_Standards_Specs_Rev4_full_doc.pdf

Appendix D

Post-Construction Stormwater Management

EXECUTIVE SUMMARY

Foresight Design Services investigated the initial 11 BMP facilities on campus to determine if they met compliance in regard to the original design as well as determining if the facilities were being maintained properly. The 2021 report completed by FDS (formerly Gay and Neel, Inc.) referenced some of the original three main areas of concern for the existing facilities on campus:

- 1) Sediment accumulation,
- 2) Invasive species,
- 3) Excessive vegetation growth.

Radford University has been working on the areas of concern and has addressed many of the original concerns from previous reports. Since 2019, RU still has excessive growth around some of the existing BMPs; it is suggested that this excessive growth be better managed and removed on a regular basis. We noted that in some cases, BMP's showed signs of excessive vegetative growth in certain areas of the facility that make it difficult to inspect the berms and the facility components.

The underground detentions have been maintained in excellent condition as well as the majority of the other detention facilities on campus. This report has seen no signs of increase in sediment in the underground facilities. However, it should be noted that some are close to reaching the 5% mark and may require sediment removal.

The constructed wetland area continues to have similar concerns from the previous reports and the current inspections still show some areas of excessive vegetation and difficulty inspecting parts of the BMP. The excessive vegetative growth makes inspections less effective to monitor for invasive species and to check for maintenance issues within the facility.

In summary, this report emphasizes the need to continue sediment monitoring, manage vegetation growth at the existing BMPs and to keep any invasive species out of the existing Constructed Wetland BMP. Typical mowing should be monthly or at least twice a year. This will allow for better access to the facility and inspections. In addition, clean and remove debris quarterly to allow for access at risers and other facility features.

The report in its entirety can be viewed on the Radford University MS4 website at <https://www.radford.edu/content/sustainability/home/resources/stormwater-management.html>

Appendix E

Pollution Prevention/Good Housekeeping

RADFORD UNIVERSITY

Illicit Discharge Detection and Elimination (IDDE)

By definition, an illicit discharge is any discharge to a municipal separate storm sewer system that is not composed entirely of stormwater, except discharges pursuant to a separate VPDES or state permit (other than the state permit for discharges from the municipal separate storm sewer), discharges resulting from firefighting activities, in other words, an illicit discharge is the discharge of any substance into a storm sewer system that is **NOT** stormwater. Some examples of these substances include:

- o Cleaning Supplies
Construction Wastes (debris, sludge, etc.)
- o Non-Residential Vehicle Wash
- o Paint
- o Vehicle Oil

Are there exceptions to this policy?

Yes! Below are examples of what is not an illicit discharge

- Fire Fighting Activities
- Dechlorinated Swimming Pool Discharges
- Landscape Irrigation and Lawn Watering
- Foundation/Footing Drains
- Water Line Flushing
- Discharges of Potable Water Sources
- Street Wash Water
- Air Conditioning Condensation

What should I do if I witness an illicit discharge?

Contact Radford University Facilities Management

If you notice any illicit discharges or have concerns about practices on Radford University grounds or construction projects please contact Facilities Management by phone at (540) 831-7800

Please be prepared to give the following information if possible:

Source of Pollution
Location of Problem
Responsible Party (If Known)
Date and Time

What is the difference between a storm sewer and a sanitary sewer?

Sanitary sewers are underground pipes that carries liquid from places like the bathroom, sinks, and kitchens to a wastewater treatment plant. Substances that enter sanitary sewers are filtered and treated before being discharged.

While storm sewers may seem similar they are only designed to carry stormwater and runoff. Storm sewers are not treated and lead directly into our natural environment. Substances that are not stormwater should never be released into the storm sewer system. At Radford University, many storm sewer inlets can be identified by the "No Dumping - Drains to Stream" medallion:



Want to find out more about Illicit Discharge Detection and Elimination?

Other resources can be found through the [EPA](#), or the [DEQ State General Permit](#).

Radford University's SWPP's and SOP's can be located at Radford University's MS4 website:

<https://www.radford.edu/content/sustainability/home/resources/stormwater-management.html>