

September 24, 2009

Mr. J. Douglas Fritz  
MS4 Program Manager  
Virginia Department of Conservation and Recreation  
203 Governor Street  
Richmond, Virginia 23219-2010

Re: Christopher Newport University MS4 Annual Report  
July 1, 2008-June 30, 2009  
Permit: VAR040090

Dear Mr. Fritz,

Per the letter I received on September 30, 2008 and the new conditions that became effective on July 9, 2008, we were required to review our existing MS4 Program Plan by January 9, 2009 and set a schedule to develop and implement a program that meets the conditions of the general permit. As such, Christopher Newport University (CNU) began a comprehensive assessment of our practices and methods in March and was completed in June 2009. In the following report, you will find a listing (Table A) of our updated Minimum Control Measures and the results (Table B) of our assessment report. Following those is a recap of our minimum control measures and our responsible party sheet. Lastly I have included the report that we will be using for our construction site inspections.

**Table A: Minimum Control Measures for the CNU MS4 Permit:**

	2008-2009	2009-2010	2010-2011	2011-2012	2012-2013
<b>Minimum Control Measure:</b>					
<b>1) Public Education &amp; Outreach</b>					
<i>Self Assessment &amp; Audit</i>	X				
<i>CNU MS4 Website</i>		X	X	X	X
<i>PLP Students-Lake Maury</i>		X	X	X	X
<i>NSF Foundation Grant</i>			X	X	X
<i>Student Courses</i>			X	X	X
<i>Coordination with other MS4</i>				X	X
<i>Outreach &amp; Education on Construction Activities</i>			X	X	X
<b>2) Public Involvement/Participation</b>					
<i>Self Assessment &amp; Audit</i>	X				
<i>PLP Students-Lake Maury</i>		X	X	X	X
<i>CNU MS4 Website</i>		X	X	X	X
<i>NSF Foundation Grant</i>			X	X	X
<i>Student Courses</i>			X	X	X
<i>Coordination with other MS4</i>				X	X
<i>Outreach &amp; Education on Construction Activities</i>		X	X	X	X
<b>3) Illicit Discharge/Detection</b>					
<i>Self Assessment &amp; Audit</i>	X				
<i>Develop &amp; Implement IDDE Policy</i>		X			
<i>Staff &amp; Student Training Program</i>		X	X	X	X
<i>Annual Recycling Program</i>		X	X	X	X
<b>4) Construction Site Stormwater Runoff</b>					
<i>Self Assessment &amp; Audit</i>	X				
<i>Develop and Implement Annual Specifications</i>		X			
<i>Establish Protocol for Project Inspections</i>		X			
<i>Outreach &amp; Education on Construction Activities</i>		X	X	X	X
<i>Cleaning underground stormwater infrastructure</i>			T.B.D.	T.B.D.	T.B.D.

	2008-2009	2009-2010	2010-2011	2011-2012	2012-2013
<b>5) Post Construction Site Stormwater Management</b>					
<i>Self Assessment &amp; Audit</i>	X				
<i>Rebuilding the Outfall Channel to Lake Maury</i>	X				
<i>Build underwater filter in Lake Maury</i>		T.B.D.	T.B.D.	T.B.D.	T.B.D.
<i>Utilize Inspection Forms for BMP's</i>		X	X	X	X
<b>6) Pollution Prevention/Good Housekeeping</b>					
<i>Self Assessment &amp; Audit</i>	X				
<i>Cleaning underground stormwater infrastructure</i>	X	X	X	X	X
<i>CNU Nutrient Management Plan</i>	X	X	X	X	X
<i>Grounds Cleanup</i>	X	X	X	X	X
<i>Staff &amp; Student Training Program</i>		X	X	X	X

Our assessment was prepared by Williamsburg Environmental Group (WEG). WEG and CNU worked closely to evaluate our past management practices and to determine some of the best ways to move forward with maintaining our MS4 general permit. Below are the results of our Self Assessment and Audit as listed in above in Table A of this report.

**Table B: Results of Self Assessment and Audit**

○ Create a Responsible Party Sheet that Accompanies the Master Plan and Annual Report.
○ Create a program manual as a single source document to be a copy of record that can be placed in the library or other public places.
○ Create quarterly meetings with responsible parties to track activities and ensure good record keeping which in turn will make annual reporting easier.
○ Look for ways to partner with neighboring MS4 operators such as VDOT, HRSD, City of Newport News, Mariners Museum, etc.
○ Develop webpage to indentify new and promote existing initiatives related to water quality
○ Integrate Academic Activities through education of students at CNU through laboratory work and classes, Student Organizations, and through field research based on NSF Grant.
○ Documentation of the inspection and maintenance of the storm water conveyance system and BMP operation/maintenance.
○ Documentation of the maintenance on the campus roads and parking lot network consisting of the removal of trash, sediment, and organic debris.

○ Documentation tracking the use of pesticides and herbicides.
○ Outline specific roles and responsibilities of contractors for all construction activities on campus through CNU: contract administration, development of annual specifications, project inspections, and reporting.
○ Develop ways to reach out to the public around construction activities.
○ Utilize standard inspection checklists for stormwater BMP's and establish timely inspection standards.
○ Develop and Implement Illicit Discharge Detection and Elimination program that addresses Program Administration, Outfall Assessment, Illicit Discharge Prevention, and procedures for Detection and Elimination.

*As reflected in Table A and Table B above, we completed our assessment and will move forward with implementing these items. CNU will look to add or revise our plan so that we accomplish the goal for each measure.*

## **Explanation of Minimum Control Measures for 2008-Present:**

### **1) Public Education & Outreach**

- **2008-2009: Self Assessment and Audit**  
**Explanation:** The audit was conducted and some of the objectives are listed in Table B.  
**Goals:** To educate and reach the public responsively and effectively.
  
- **2009-2010:** We have already fulfilled our second objective that is listed as PLP Students-Lake Maury.  
**Explanation:** This project consisted of myself taking a group of 16 students to clean our outfall channel that drains to Lake Maury and to clean around Lake Maury. The students were explained and briefed on the importance of water quality and how our campus activity affects the environment downstream.  
**Goals:** The goal for the Lake Maury cleanup project was to educate the students and remove trash and foreign material from the outfall channel and around Lake Maury. I am happy to report we collected near 100 gallons of trash from in and around the lake along with some items such as rugs and chairs.

### **2) Public Involvement & Participation**

- **2008-2009:** Self Assessment and Audit  
**Explanation:** The audit was conducted and some of the objectives are listed in Table B.  
**Goals:** To look for more ways to involve the students and community in stormwater management.

- **2009-2010:** Along with the Lake Maury cleanup, we will begin to rebuild our CNU Website this year to satisfy this requirement.  
**Explanation:** See above for the explanation of the Lake Maury Cleanup. In addition, the website will be rebuilt to become current to include our updated plan and other links associated with stormwater management, the Chesapeake Bay, etc.  
**Goals:** To involve and educate the Public regarding water quality as it relates to stormwater runoff.

### 3) Illicit Discharge/Detection

- **2008-2009:** Self Assessment and Audit  
**Explanation:** The audit was conducted and some of the objectives are listed in Table B.  
**Goals:** To educate staff and public regarding discharges into the stormwater system through prevention and IDDE policy.
- **2009-2010:** Development and Implement IDDE Policy, Train Staff and Students, Recycling  
**Explanation:** We will begin to develop first the IDDE Policy and look to train staff this winter on how to protect our storm water discharges. We also each year have a company come to our areas and collect any materials that may be hazardous to our storm water or other systems. We will look to monitor and track these removals better this year.  
**Goals:** To educate staff and public regarding discharges into the storm water system through prevention and IDDE policy.

### 4) Construction Site Stormwater Runoff

- **2008-2009:** Self Assessment and Audit, CNU Outfall channel  
**Explanation:** The audit was conducted and some of the objectives are listed in Table B. CNU also rebuilt the outfall channel from CNU to Lake Maury.  
**Goals:** Determine where our deficiencies were regarding our MS4 permit relating to our construction activities on campus. The outfall channel will filter stormwater discharge from the campus stormwater infrastructure.
- **2009-2010:** Develop Annual Specifications, Protocol for Project Inspections, Outreach and Education around Constructions Sites  
**Explanation:** We are currently looking to an outside contractor to help us develop annual specifications. To have another check and balance, CNU will begin conducting onsite review of storm water drains in and around the constructions sites so that we do not rely on the general contractor. Around these sites opportunities are present themselves to us to educate the public so we look to implement some signage around sites.  
**Goals:** To become better stewards of our construction sites in the early phases beginning with pre-construction meetings throughout the duration of the project.

### 5) Post Construction Site Stormwater Management

- **2008-2009:** Self Assessment and Audit, CNU Outfall Channel  
**Explanation:** The audit was conducted and some of the objectives are listed in Table B. CNU also, as listed above, has rebuilt the outfall channel into Lake Maury.  
**Goals:** To determine our weaknesses through the assessment and protect Lake Maury.

- **2009-2010: Site Inspection Forms, Underwater Filter in Lake Maury**  
**Explanation:** CNU will begin conducting BMP inspections monthly utilizing forms that were presented in the January report. At some point, CNU will add an underwater filter system in Lake Maury to capture any sediment that may escape the outfall channel.  
**Goals:** To become stewards of our BMP's post construction through monitoring and additional structures.

#### 6) Pollution Prevention

- **2008-2013: Self Assessment and Audit, Cleaning Underground Infrastructure, Nutrient Management Plans, Grounds Cleanup, Employee Training Program**  
**Explanation:** The audit was conducted and determined we were doing many of the items mentioned, however our documentation was lacking for the items.  
**Goals:** To maintain records relating to cleaning infrastructure, nutrient management, etc. for reporting purposes, and to train employees on stormwater pollution and prevention. I am able to report that our Nutrient Management Plans have been approved through April 2012. I am also able to report that we daily collect an estimated 10 gallons of ground litter. This equates to 3,650 gallons per year.

CNU currently has 3 projects that are being monitored by the DCR and by CNU representatives. They are the new McMurrin Building, new Science Building, and major expansion of the Freeman Center. CNU is also upgrading the campus storm water infrastructure at the Freeman Center and at the athletic field facilities. The Freeman Center addition will also allow for the demolition of an existing detention basin on the southeast side of the site. Koontz-Bryant, P.C. is working closely with CNU and the DCR on these projects that will become an integral part of our infrastructure.

Should you have any questions, you can reach me at 757-594-8700 or [dean.whitehead@cnu.edu](mailto:dean.whitehead@cnu.edu).

Best regards,

Dean Whitehead  
Director of Grounds  
Christopher Newport University

## Responsible Parties

- ***Responsible Corporate Officer***  
Mr. William L. Brauer  
Executive Vice President
- ***Program Manager***  
Mr. R. Dean Whitehead  
Director of Grounds Department
- Mr. Leonard L. Alger  
Director of Plant Operations Department
- Mr. Hunter Bristow  
University Architect
- Mr. Bruce Bronstein  
Director of Communications
- Mr. Brian Larson  
Director – President’s Leadership Program
- Mr. Doug Shipley  
Director of Auxiliary Support
- Mr. Jonathan S. Waters  
Assistant Director of Athletics
- Dr. Edwards Weiss  
Department Chair of Biology, Chemistry, and Environmental Science  
Faculty Representative – Sustainability and Environmental Committee
- Dr. Gary Whiting  
Principal Investigator: NSF GK-12  
Fellows Grant