

MS4 Stormwater General Permit

James City County is required to have a Virginia Stormwater Management Program (VSMP) permit to discharge stormwater into local waterways. The specific permit is referred to as the Municipal Separate Storm Sewer System (MS4) General permit and is issued by the state Department of Conservation and Recreation. The State Program was established in response to federal requirements under the Clean Water Act and administered by the Environmental Protection Agency.

The permit requires James City County to develop a stormwater management program that addresses six specified minimum control measures. The six minimum control measures to be used in the County's program are the following:

1. Public Education and Outreach on Stormwater Impacts
2. Public Involvement/Participation
3. Illicit Discharge Detection and Elimination (IDDE)
4. Construction Site Stormwater Runoff Control.
5. Post-Construction Stormwater Management in New Development and Redevelopment.
6. Pollution Prevention/Good Housekeeping for Municipal Operations.

Each minimum control measure has one or more requirements that James City County will have to accomplish as a part of its stormwater management program. To meet these requirements, the County has proposed structural and non-structural best management practices to help reduce the amount of stormwater pollution entering local creeks and streams. The identified best management practices and action items for achieving the requirements of each of the six minimum control measures are described in the County's permit document and contained in the Program Plan.

The County is in its second 5 year permit cycle, which began on July 9, 2008. When implemented over the next several years, the best management practices described in the permit program plan are expected to result in reductions of stormwater pollutant discharges into James City County's waterways.

1. Public Outreach and Education - James City County

BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
1.1	Participate in regional committees: HRSTORM, HR GREEN, Regional Stormwater Management Committee (RSMC), and SW Phase II Subcommittee					HR STORM Annual Report, MOA, HRPDC Regional Cooperation in Stormwater Management
1.1a	<i>Regional Cooperation</i>	Renew MOA with the HRPDC to participate in the regional processes, including the Regional Stormwater Management Program, the Stormwater Phase II Subcommittee and HR STORM.	Maintain valid MOA	HRPDC	Ongoing	Memorandum of Agreement (MOA)
1.1b	<i>HR STORM and HR GREEN</i>	Participate in at least 50% of monthly HR STORM meetings	Number of meetings attended/Number of meetings held	Stormwater Division	Annually	Attendance List
		Participate in annual HR GREEN meetings and subcommittee meetings as appropriate.	Number of meetings attended	Stormwater Division	Annually	
		Participate in the development of regional Strategic Plans and Communication Plans for HR STORM and HR GREEN.	Participation	Stormwater Division	Annually	Strategic Plan; Communication Plan
1.1c	<i>Stormwater Phase II Subcommittee</i>	Participate in at least 50% of monthly SW Phase II Subcommittee Meetings.	Number of meetings attended/Number of meetings held	Stormwater Division	Annually	Attendance List

1. Public Outreach and Education - James City County						
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
		Participate in identifying stormwater education needs and priorities through the HRPDC Phase II Subcommittee.	Participation	Stormwater Division	Annually	
1.2	Educate citizens on techniques to reduce impacts of stormwater pollution on public waterways with an emphasis on impaired waters.					
1.2a	<i>James City County PRIDE (Protecting Resources in Delicate Environments) Program</i>	Distribute County-specific information to citizens and identified target audiences through an updated PRIDE website	Number of target audiences included on site and improved visitation levels	Stormwater Division	PY2 and ongoing	Website content
1.2b	<i>Distribute educational materials developed through HR STORM.</i>	Distribute materials developed through HRSTORM to target audience in locality.	Number of materials distributed	Stormwater Division	Ongoing	Education materials
1.2c	<i>Maintain and enhance HR STORM Website, coordination with other educational programs, and distribution of e-newsletter.</i>	Improve visits and click through rates to industry standard by end of permit cycle	Click through rates as compared to industry standard	HRPDC	Permit Cycle	
1.2d	<i>Ensure distribution of regional environmental tabloid to all 6th graders and teachers' guides to all 6th grade teachers</i>	Develop and Distribute environmental tabloids	Number of tabloids distributed	HRPDC and Stormwater Division	Permit Cycle	Tabloid

1. Public Outreach and Education - James City County

BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
1.2e	<i>Regional Media Campaign</i>	Participate in the HR STORM regional media campaign which will make impressions with a stormwater message via print, television (local municipal access, cable and local affiliate), and radio with a target of reaching 72% of adults (25-54) three times over.	Demographic, reach and frequency	HRSTORM	Annually	Copies of ads
1.2f	<i>"Scoop the Poop" Campaign</i>	Make "Scoop the Poop" information and giveaways available where citizens receive animal licenses and at pet-related events as appropriate	Number of giveaways distributed	Stormwater Division	Annually	
1.2g	<i>"Chesapeake Club" Campaign</i>					
	<i>Target Homeowners and Landscapers</i>	Recruit participating landscaping and lawn care companies to participate as a Chesapeake Club partner by offering the Chesapeake Club treatment option at least once during the permit cycle.	List of participating landscaping companies	Stormwater Division	Permit Cycle	List of Landscapers
	<i>Turf Love Nutrient Management Planning for Homeowners and Community-owned lands</i>	Provide soil testing and nutrient management plans directly to property owners in order to reduce the unnecessary use of fertilizers	Number of soil tests, number of nutrient management plans, number of property owner contacts	PRIDE Team and Master Gardeners (Virginia Cooperative Extension)	Annually	Educational materials and distribution list
	<i>Target Restaurant Owners and Patrons</i>	Recruit restaurants to participate as a Chesapeake Club partner, promoting the message of reduced fertilizer use at least once during permit cycle.	List of participating restaurants	Stormwater Division	Permit Cycle	List of Restaurants

1. Public Outreach and Education - James City County						
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
1.3	Illicit Discharge Elimination Education					
1.3a	<i>Educate public employees on hazards and legal implications of illegal discharges and improper disposal of waste.</i>	Identify and prioritize education and training needs for County employees through the HRPDC Phase II Subcommittee.	Prioritized list of training needs and number of employees that need training.	Stormwater Division	End of PY1	Prioritized needs list
		Conduct 2 trainings per permit cycle	Number of trainings, and number of attendees	HRPDC	Permit Cycle	Description of training
		Ensure at least 20% of appropriate employees attend IDDE training(s) coordinated by the HRPDC.	Number of participants/ Number of identified appropriate employees	Stormwater Division	Permit Cycle	List of attendees
1.3b	<i>Target local commercial, industrial, and institutional entities likely to have significant stormwater impacts.</i>	Identify and prioritize education needs for businesses, and residential behaviors according to relative risk for producing illicit discharges through the HRPDC Phase II Subcommittee.	List of entities and priorities	Stormwater Division	Within first 2 years of Permit	Priority list and materials developed
1.3c	<i>Educate business owners on hazards and legal implications of illegal discharges and improper disposal of waste.</i>	Distribute educational materials developed through the HRPDC to groups with high risk for producing illicit discharges.	Number of materials distributed.	Stormwater Division	Permit Cycle	Education materials and distribution list.
1.3d	<i>Educate homeowners on hazards and legal implications of illegal discharges and improper disposal of waste.</i>	Promote 58-STORM info line for appropriate contacts in each locality for citizens to report illicit discharges.	Number of calls	HRPDC and locality	Post new info in PY1	Script, updated contact lists, phone bill with numbers of calls, logs on any follow up actions.
		Investigate possibility of regional 800 number for illicit discharge reporting.	Establish regional line/ number of calls	HRPDC Staff	If feasible, establish line in PY2	

1. Public Outreach and Education - James City County						
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
1.4	Encourage involvement in James City County water quality improvement initiatives.					
		Post volunteer opportunities on James City County website.	Number and types of events	Stormwater Division	Annually	James City County website
		Submit articles for HR GREEN regional e-newsletter for public participation in water quality improvement initiatives.	Number and types of events submitted	Stormwater Division	As needed	E-newsletter
		Post volunteer opportunities through HR STORM and/or HR GREEN	Number and types of events submitted	HRPDC Environmental Educator	Annually	websites
1.5	Diversify strategies to target local MS4 specific audiences.	Expand fact sheet series	Identify and prioritize targets	HR STORM	PY 2	Factsheets, e-newsletters, and
			Produce specific fact sheets	HR STORM	PY 3-5	
		Target HOA and civic groups in the watersheds of Impaired Waters	Number and type of outreach activities	Stormwater Division	As needed	Documentation on outreach activity
1.6	Improve outreach program to address concerns of target audience as well as minorities, disadvantaged audiences, and minors .	Improve outreach to school-aged children	Reprint of HR STORM tabloid size newspaper for elementary schools	HR STORM/ HR Green	PY 1, 3, and 5	Newspaper
		Improve outreach to disadvantaged and minority audiences.	Targeted ads through channels such as CW, BET, and urban radio stations.	HR STORM	Annually	Affidavits from TV and radio
1.7	Evaluation and Assessment	Evaluate and assess progress towards meeting measurable goals.	In accordance with Section I E of 4VAC50-60-1200	Stormwater Division	Annually	Annual report

2. Public Involvement/Participation - James City County						
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
2.1	Provide Public Notice of Program Plan and Modifications	Promote the availability of the operator's MS4 Program Plan and any modifications for public review and comment in accordance with public law.	Public notice of modifications.	Stormwater Division	As necessary	Virginia Code reference, updated plan
2.2	Make Program Plan and other Stormwater Program Information Available to Public	Provide the program plan, stormwater annual reports, the stormwater permit, and the stormwater ordinances on the County's website.	Public notice of modifications.	Stormwater Division	Ongoing	Program Plan, Annual Reports, Stormwater Permit and Ordinances
2.3	Participate in local activities to improve water quality					
2.3a	PRIDE Implementation Projects	Conduct PRIDE implementation projects that promote water quality improvement	Number of implementation projects	PRIDE Team	Annually	Project documentation
2.3b	Volunteer Water Quality Monitoring	Provide equipment and training to citizens interested in monitoring the biological health of County water bodies	Number of sites monitored	Stormwater Division	Three times per year per site	Monitoring Results
		Expand volunteer monitoring programs to include coliscan screening of TMDL watersheds	Number of sites monitored	Stormwater Division	Beginning in PY2, monthly	Monitoring Results
2.3c	TMDL Participation	Actively involve citizens in the development of TMDLs and TMDL Implementation Plans	Notification of meetings/Number of attendees	Stormwater Division	As appropriate	
2.4	Stormwater Program Advisory Committee	Continue to secure citizen advice and recommendations through regularly scheduled public meetings of the Committee	Number of meetings	Stormwater Division	Quarterly	SPAC minutes and publications
2.5	Evaluation and Assessment	Evaluate and assess progress towards meeting measurable goals.	In accordance with Section I E of 4VAC50-60-1200	Stormwater Division	Annually	Annual report

3. Illicit Discharge Detection and Elimination - James City County						
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
3.1	Storm Sewer System Map	Map all known outfalls (all existing known outfalls from the MS4 were mapped in 2007/2008)	Number of outfalls catalogued and mapped	Stormwater Division	Map new outfalls within 180 days of project completion	Map
		Map surface waters and impaired waters. Estimate MS4 acreage discharging to each HUC and impaired water.	Impaired waters with HUCs	Stormwater Division	PY1	Registration Statement; Map
3.2	Illicit Discharge Detection & Elimination Ordinance	Continue implementing and enforcing the Illicit discharge/Stormwater Management Ordinance.	Number of investigations and actions taken	Stormwater Division	Ongoing	Stormwater Management Ordinance, Chapter 18A of County Code
3.3	Illicit Discharge Detection & Elimination Procedures	Continue implementing an illicit discharge detection and elimination program for the municipally-owned MS4 within the Urbanized Area.	Develop regionally consistent protocol for responding and investigating IDDE	HRPDC and Phase II Localities	PY1	Investigation forms
		Track illicit discharge detection and elimination activities.	Number of investigations and actions taken	Stormwater Division	Ongoing	PARS
3.4	Prevent or minimize the discharge of hazardous substances and oil in the MS4 stormwater discharge.	Yard inspections; Develop/enhance reporting relationship with Fire Department/Haz Mat Team; targeted education	Number of responses; number of inspections	Stormwater Division	Ongoing	Inspection forms

3. Illicit Discharge Detection and Elimination - James City County						
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
3.5	Cooperation with adjacent MS4s	Identify and notify in writing, any downstream regulated MS4 to which James City County's regulated MS4 is physically interconnected of the small regulated MS4's connection to that system.	Develop map, Regional Phase II Stormwater Subcommittee Meetings, letters	Stormwater Division	PY1	Letters; meeting attendance
3.6	Report all spills that reach state waters to the DEQ and DCR					
3.6a	Report non-sewer spills and releases from small MS4 regulated properties that reach state waters to the Virginia EOC, who in turn reports to the DEQ.	Report spills to Virginia EOC and file internal reports. Virginia EOC reports to Department of Environmental Quality's Pollution Response Program (PREP).	Number of internal reports. If applicable, obtain PREP Incidence Response number.	Fire Department	Report in accordance to Section III. G.	Internal report
3.6b	Report Sanitary Sewer Overflows through SSORS database.	Continue to utilize SSORS to report Sanitary Sewer Overflows	Number of overflows	James City Service Authority (JCSA)	As necessary	
3.7	Continue Sanitary Sewer System improvements in coordination with SSO consent order	Meet requirements of the Consent Order	Compliance accomplishments	JCSA	In accordance with Consent Order	As required by Consent Order
3.8	Evaluation and Assessment	Evaluate and assess progress towards meeting measurable goals.	In accordance with Section I E of 4VAC50-60-1200	Stormwater Division	Annually	Annual report

4. Construction Site Storm Water Runoff Control - James City County						
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
4.1	James City County Erosion and Sediment Control Ordinance, Chapter 8 of the County Code	Continue to implement the site plan review, LID implementation where deemed appropriate, construction site BMP, and inspection provisions of the County's Erosion and Sediment Control Ordinance.	Number of inspections; number of plan reviews, number of enforcement actions	Environmental Division	Annually	Environmental Division database; PARS is being developed to track these items as well
		"At a minimum be consistent with the Virginia Erosion Control Law and Regulations"	Soil and Water Conservation Board finding of consistency	Environmental Division	Ongoing; as needed, implement any corrective actions for deficiencies identified by DCR in accordance with an agreed upon CAA	Letter from DCR
		Continue to receive and respond to information from citizens relating to the County's erosion and sediment control program through personal visits, email, telephone, and the County's web page.	Number of calls/requests, number of site visits	Environmental Division	Annually	Tracked in Environmental Division database and PARS

4. Construction Site Storm Water Runoff Control - James City County						
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
4.2	VSMP Permits	Require construction site owners and operators to secure authorization to discharge stormwater from construction activities under a VSMP permit for construction activities that result in a land disturbance of greater than or equal to 2500 square feet in all areas of the County as the entire County is designated as a Chesapeake Bay Preservation Area.	Number of permit applications and permits issued.	Environmental Division	Ongoing; require permit registration statements or actual permits by PY2	Copies of permits and registration statements
4.3	Training	Participate in the development of at least one regional contractor training session during the life of the permit.	Trainings Completed	HRPDC & Phase II SW Committee	One per permit cycle	Training sessions and evaluation forms
		Ensure that plan reviewers, inspectors, and program administrators obtain the appropriate certifications as required under the Erosion and Sediment Control Law	Certifications obtained	Environmental Division	Ongoing	Copies of certificates
4.4	Tracking and Reporting	Continue to track and report the total number of permitted land disturbing activities as well as the total disturbed acreage.	Number of permits and acres disturbed	Environmental Division	Annually	Annual Report
4.5	Evaluation and Assessment	Evaluate and assess progress towards meeting measurable goals.	In accordance with Section I E of 4VAC50-60-1200	Environmental and Stormwater Divisions	Annually	Annual report

5. Post Construction Storm Water Management in New Development and Redevelopment - James City County

BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
5.1	Stormwater Management Ordinances	Continue to implement the stormwater criteria of the Chesapeake Bay Preservation, and Erosion and Sediment Control Ordinances for new development and redevelopment, and update ordinances to comply with Section II.5.a of the General Permit.	Ordinance updates	Environmental Division	Ongoing implementation, ordinance updates as needed	Chesapeake Bay Preservation - Chapter 23, and Erosion and Sediment Control - Chapter 8 of the County Code
5.2	Encourage the use of Low-Impact Development (LID)	Encourage the use of LID as appropriate to local/regional conditions.	Conduct LID workshop for Hampton Roads localities	HRPDC	PY2	Screening tool
		Develop fact sheet/checklist to help developers and local staff determine appropriateness of LID for project(s)	Checklist developed	HRPDC & Regional Stormwater Management Committee	PY2	Fact sheet
5.3	VSMP Permits	Require construction site owners and operators to secure authorization to discharge stormwater from construction activities under a VSMP permit for construction activities that result in a land disturbance of greater than or equal to 2500 square feet in all areas of the County as the entire County is designated as a Chesapeake Bay Preservation Area.	Number of permit registration statements and permits obtained.	Environmental Division	Ongoing; require permit registration statements or actual permits by PY2	Copies of permits and registration statements
5.4	BMP Maintenance Agreements	Require BMP maintenance agreements as required by the Chesapeake Bay Preservation Ordinance.	Number of agreements and inspection schedules	Environmental Division	Ongoing	Maintenance Agreements and schedules

5. Post Construction Storm Water Management in New Development and Redevelopment - James City County

BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
5.5	BMP Maintenance Program	Update mapping of all public and privately owned structural stormwater controls with reference to HUC and any impaired waters in drainage area.	Map	Stormwater Division	As needed	Map
		Develop schedules for regular inspection and maintenance of County maintained stormwater control structures in accordance with state Stormwater regulations.	Number of inspections	Stormwater Division	Annually	PARS
5.6	Site Inspection and Enforcement	Conduct site inspections	Number of Inspections & Reinspections; enforcement actions	Stormwater Division	Ongoing	PARS
5.7	BMP Tracking	Track all known permanent stormwater management facilities that discharge to the regulated small MS4 and submit the following information: (a) Type of structural stormwater management facility installed as defined in the Virginia Stormwater Management Handbook; (b) Geographic location (HUC); (c) Where applicable, the impaired surface water that the stormwater management facility is discharging into; (d) Number of acres treated.	Number and type of BMP, location, watershed, acres treated, impaired waters	Stormwater Division	Annually	PARS
5.8	Evaluation and Assessment	Evaluate and assess progress towards meeting measurable goals.	In accordance with Section I E of 4VAC50-60-1200	Stormwater Division	Annually	Annual report

6. Pollution Prevention/Good Housekeeping for Municipal Operations - James City County

BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
6.1	Employee Education & Training	Identify and prioritize pollution prevention education and training needs for James City County employees based on relative risk for stormwater pollution from municipal operations through the HRPDC Phase II Subcommittee.	Training Schedule	HRPDC and Phase II Localities	Once during permit cycle	Training schedule
		Develop training materials to eliminate illicit discharges from storage yards, fleet and maintenance shops, outdoor storage areas, rest areas, waste transfer stations, and other municipal facilities.	Develop fact sheets	HRPDC	Permit Cycle	Training documents
		Develop and distribute training materials to inform employees on proper waste disposal techniques.	Develop fact sheets	HRPDC	Permit Cycle	Training documents
		Educate local government employees on protecting soluble and erodible materials from exposure or precipitation.	Develop fact sheets	HRPDC	Permit Cycle	Training documents
		Educate James City County employees on proper techniques for fertilizer and pesticide application.	Develop fact sheets	HRPDC	Permit Cycle	Training documents
		Distribute pollution prevention educational materials developed through the HRPDC/HR STORM to James City County employees engaging in operations with a high risk of discharging pollutants into the MS4.	Number of items distributed	HRPDC and Phase II Localities	Annually	E-newsletter, training materials
		Participate in at least one regional annual training workshop for municipal employees engaging in operations with a high risk of discharging pollutants into the MS4 coordinated by the HRPDC Phase II Subcommittee.	Number of employees attending	Stormwater Division	Annually	Training outline

6. Pollution Prevention/Good Housekeeping for Municipal Operations - James City County

BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
6.2	Spill Prevention & Control Plans	Develop plans describing spill prevention and control procedures for municipal facilities by end of PY 2.	Standard Operating Procedure (SOP)	Stormwater Phase II Subcommittee	PY2	SOP
		Determine any educational needs for employees and develop appropriate training and/or materials.	Training assessment	Stormwater Phase II Subcommittee	Once per permit cycle	Training Schedule
6.3	Operations & Maintenance Program	Document formal Operation & Maintenance (O&M) Plan for County-maintained stormwater facilities to include activities, schedules, and inspection procedures that include provisions and controls to reduce pollutant discharges into the regulated small MS4 and receiving surface waters.	O&M Plan	Stormwater Division	By the end of the permit cycle	O&M Plan
6.4	Evaluation and Assessment	Evaluate and assess progress towards meeting measurable goals.	In accordance with Section I E of 4VAC50-60-1200	Stormwater Division	Annually	Annual report

Update to James City County's MS4 Program Plan for TMDL Special Conditions

TMDL SPECIAL CONDITIONS (effective starting January 8, 2010)						
BMP	BMP Description	Measurable Goals	Metric	Responsible Party	Timeline	Associated Documents
7.1	List Program Plan components related to source reduction of pollutants indicated in WLAs.	Develop list of current ordinances and legal authorities, BMPs, policies, plans, procedures and contracts implemented as part of the MS4 Program that are applicable to reducing bacteria from lands draining to Skiffes Creek stream segments that have a bacteria TMDL for which James City County received a WLA (waste load allocation).	List	Stormwater Division	End of PY2 (6/30/2010)	List of applicable components.
7.2	Evaluate Program Plan for effectiveness to reduce pollutant indicated in WLAs.	Use checklist created by HRPDC to evaluate ordinances and program elements	Checklist	HRPDC / Stormwater and Environmental Divisions	End of PY3 (6/30/2011)	
		Review water quality data collected by DEQ and the Stormwater Division to track water quality improvements for bacteria.	Data summary	Stormwater Division / HRPDC	Annually	Water quality data summary
7.3	Develop a schedule to address Program Plan deficiencies addressing bacteria pollution delivered to TMDL waterbodies.	Schedule to update program components and ordinances identified in BMP 7.2	Schedule	Stormwater and Environmental Divisions	End of PY4 (6/30/2012)	Schedule
		List of limited legal authorities that need to be addressed by the General Assembly.	List	Stormwater and Environmental Divisions	Permit Cycle	List
7.4	Implement Schedules in 7.3	Implementation according to schedules developed under 7.3	Implementation	Stormwater and Environmental Divisions	According to 7.3	Progress Report
7.5	Public education and outreach to promote bacteria source reduction.	Continue to promote public education through HRSTORM and activities listed under BMP 1.2 of Program Plan.	As defined in 1.2	HRPDC / Stormwater and Environmental Divisions	Annually	
7.6	Participate as a stakeholder in the development of TMDL Implementation Plans	Participate in development of TMDL Implementation Plan for Skiffes Creek	Participation	Stormwater and Environmental Divisions	Permit Cycle	Implementation Plan
7.7	Outfall Reconnaissance	Develop outfall reconnaissance procedures as outlined in 4VAC50-60-1240 Section I.B.5 or using approved alternate technique.	Reconnaissance Plan	Stormwater Division	End of PY2 (6/30/2010)	Reconnaissance Plan
		Conduct reconnaissance of all outfalls from MS4 area within Skiffes Creek drainage area.	Number of outfalls	Stormwater Division	Annually	Reconnaissance Reports.
		Identify outfalls from MS4 area to Skiffes Creek drainage area.	Map of outfalls	Stormwater Division	End of Permit Cycle (6/30/2013)	Map and Report.
7.8	Evaluate properties owned or operated by MS4 that may contribute bacteria to TMDL	Develop list of land use categories that could contribute bacteria.	List	Stormwater Division / HRPDC	End of PY2 (6/30/2010)	
		Map James City County owned properties within MS4 area that drain to Skiffes Creek.	Map	Stormwater Division	End of PY2 (6/30/2010)	Map
		Identify James City County properties with potential to generate bacteria pollution.	List	Stormwater Division	End of PY3 (6/30/2011)	List
		Conduct site review of identified James City County properties in accordance with 4VAC50-60-1240 Section I.B.6	Site Review	Stormwater Division	January 2013	
		Develop schedule to reduce any discharges found during review described in 4VAC50-60-1240 Section I.B.6	Schedule	Stormwater Division	End of Permit Cycle (6/30/2013)	
		Implement Schedule produced in accordance with 4VAC50-60-1240 Section I.B.6c		Stormwater Division and James City Service Authority (JCSA)	In accordance with schedule	
7.9	Characterize volume of stormwater and bacteria concentrations delivered from MS4 areas to TMDL waterbodies.	Calculate discharge of bacteria from MS4 area to Skiffes Creek.	Concentration and loading of bacteria	Stormwater Division		
7.10	Update Program Plan as necessary to include new TMDL information.					