

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY INDUSTRIAL ACTIVITY STORM WATER DISCHARGE PERMITTING

EPA published their Phase 1 Storm Water Regulations in November 1990, establishing permitting requirements under the National Pollutant Discharge Elimination System (NPDES) permit program for storm water discharges associated with industrial activity (including construction activity) and for discharges from "large" and "medium" municipal separate storm sewer systems (MS4s). In December 1999, EPA published their Phase 2 Storm Water Regulations, which added permitting requirements for "small" construction activity discharges and "small" MS4s, and allowed industrial facilities to be exempted from storm water permitting requirements through a "No Exposure" certification. Within the Commonwealth of Virginia, the Department of Environmental Quality (DEQ) administers the industrial activity storm water permitting program (excluding construction activity) as part of the State's VPDES permit program. Construction activity storm water discharges and regulated MS4s are permitted by DEQ under the Virginia Stormwater Management Program (VSMP).

A. Industrial Activities/Facilities Required To Obtain Permit Coverage.

Under the Phase 1 EPA rules, there are ten categories of industrial activity that require storm water discharge permits (see Attachment 1). The primary Standard Industrial Classification (SIC) code, or the specific industrial activities occurring at a facility determine whether or not the facility is required to be permitted under the regulations.

Basically, the term "industrial activity" covers manufacturing facilities (SIC code specific); hazardous waste treatment, storage, or disposal facilities; landfills that receive or have received "industrial activity" wastes; recycling facilities (limited to SIC 5015 and 5093); steam electric power generating facilities; transportation facilities with maintenance activities on site; and domestic sewage treatment plants greater than 1.0 MGD. The Phase 2 storm water regulations added a "no-exposure" exemption provision for industrial facilities (see below).

If an industrial facility has a landfill (open or closed) or a steam electric power generating facility, a permit must be obtained for these activities, regardless of the facility's SIC code.

Any industrial facility covered by the regulations that discharges storm water through a point source to surface waters of the State, or through a municipal or non-municipal separate storm sewer system must apply to DEQ for a storm water permit. A point source is defined as "any discernible, confined, and discrete conveyance, including but not limited to, any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, landfill leachate collection system, vessel or other floating craft from which pollutants are or may be discharged".

A facility is exempt from the requirements if the storm water discharge is to a publicly owned treatment works (POTW) or through a combined sewer system (CSS) (combined sanitary/storm sewer system).

This rule does not apply to "sheet flow" running off an industrial facility ("sheet flow" being runoff which is not collected in any pipe, ditch, channel, etc.). It also does not apply to discharges from employee parking lots, administrative buildings, and areas at a facility that are not involved with the industrial activity if these discharges are segregated from the industrial activity storm water discharges.

Flows which are channeled into basins and have no discharge into State or federal waters are also not covered by this rule. Storm water discharges to groundwater are not covered by this rule, unless there is a hydrological connection between the groundwater and a nearby surface waterbody.

Municipal, State and federal facilities, regardless of their size, are required to submit a permit application if they are engaged in an industrial activity covered by the regulation.

B. Permit Application Options.

DEQ has two permit application options for industrial storm water dischargers:

- Registration for General Permit Coverage; and
- Individual Permit Applications.

In addition, industrial facilities with no exposure of industrial activities or materials to storm water may file a "no exposure" certification with DEQ, allowing the facility to be exempted from the VPDES storm water permitting requirements (see below).

1. General Permit Registration.

General permits are permits written for a general class of dischargers. In Virginia, general permits must be written as both permits and regulations. DEQ has a general permit regulation in effect for industrial activity storm water discharges – the VPDES General Permit Regulation for Discharges of Storm Water Associated With Industrial Activity (9 VAC 25-151; permit number VAR05).

Attachment 2 lists the facilities/SIC Codes eligible for coverage under the industrial storm water general permit. There are certain industrial activities that are not covered by this general permit. Virginia has already adopted general permit regulations for concrete products facilities (VAG11) and nonmetallic mineral mining operations (VAG84). Therefore, these industrial categories are not included in this permit. Facilities in these categories are able to obtain coverage for their storm water discharges under the category-specific general permits, and those general permits contain requirements and conditions comparable to those in the industrial storm water permit. Another industrial category excluded from this permit is coal mines and mining related activities subject to the Surface Mining Control and Reclamation Act of 1977 (SMCRA). Point source discharges from SMCRA coal mines are regulated by the Virginia Department of Mines, Minerals and Energy's Division of Mined Land Reclamation. This delegation of authority is recognized in the VPDES Permit Regulation in 9 VAC 25-31-940. Only those coal mine related activities that are exempt from SMCRA and the DMME individual permit program are eligible for coverage under this general permit.

Owners of qualifying industrial facilities may obtain general permit coverage by submitting a complete Registration Statement to DEQ. A complete Registration Statement consists of:

- (1) An Industrial Storm Water General Permit Registration Statement form (SWGP-VAR05-RS); a copy of both a general location map and a site map; and a list of all the industrial sectors applicable to the facility (see Attachment 2) and the storm water outfall(s) associated with each sector; and

(2) A Permit Application Fee form and application fee of \$500.00.

The completed Registration Statement (with all attachments) should be mailed to the DEQ Regional Office serving the area where the industrial facility/activity is located (see Attachment 3 for Regional Office locations and addresses).

A copy of the Registration Statement form, the Water Permit Fee form and the check (made out to "Treasurer of Virginia") should be mailed to the following address:

Department of Environmental Quality
Receipts Control
P.O. Box 1104
Richmond, Virginia 23218

For new facilities with storm water discharges associated with industrial activity, Registration Statements must be submitted 60 days prior to beginning the discharge. Existing facilities with industrial activity storm water discharges should already have applied for permit coverage. If this has not been done yet, contact the appropriate DEQ Regional Office as soon as possible.

Once the Registration package is deemed complete the DEQ Regional Office will send the owner a copy of the general permit and indicate the date of coverage.

2. Individual Applications.

Individual permit applications should be filed by those facilities that do not qualify to be covered under a general permit. Complete individual applications consist of EPA Forms 1 and 2F, and an Application Fee form and fee. The application fee is \$7,200. EPA Form 2F requires the owner of the facility to sample at least one representative storm event and report the results with the application.

For new facilities with storm water discharges associated with industrial activity, applications must be submitted to DEQ 180 days prior to beginning the discharge. Existing facilities with industrial activity storm water discharges should already have applied for permit coverage. If this has not been done yet, contact the appropriate DEQ Regional Office as soon as possible.

3. No-Exposure Certification.

Industrial facilities that would otherwise be required to have a storm water permit can be exempted from permitting if they certify that all their storm water discharges meet the definition of "no exposure". If all industrial materials and activities at a facility are protected by a storm resistant cover so that they are not exposed to rain, snow, snowmelt, or runoff, then the facility can qualify for the "no exposure" exemption. Facilities must file a "No-Exposure Certification" every five years with the appropriate DEQ regional office (see Attachment 3), and if conditions change at the facility and materials or activities become exposed, the facility must immediately file for a VPDES storm water permit. There is no fee to file a No Exposure Certification.

C. Storm Water Permit Requirements.

Storm water permits require the development and implementation of a storm water pollution prevention plan (SWPPP) to reduce the pollutants in storm water discharges and to meet water quality standards. In addition to the general SWPPP requirements that all facilities must meet, there are sector specific SWPPP requirements that facilities may be required to meet. Facilities with activities described in more

than one industrial sector are subject to the SWPPP requirements from each sector (i.e., the sector specific requirements are additive for "co-located industrial activities"). For most facilities, it is anticipated that the implementation of Best Management Practices (BMPs) will be sufficient to control the discharge of pollutants from storm water runoff. The permit holder maintains the pollution prevention plan at the facility and does not submit the plan to DEQ for approval.

In addition to the SWPPP requirements, facilities may be required to perform storm event monitoring of their discharges. Four types of monitoring are included in storm water permits:

1. Compliance Monitoring.

Facilities subject to EPA Effluent Limitation Guidelines (wet deck log storage area runoff at timber products facilities; phosphate fertilizer manufacturing facilities; asphalt paving and roof emulsion manufacturing facilities; landfills; cement manufacturing facilities, and certain airport deicing activities) and facilities with coal piles have semi-annual effluent limitation monitoring requirements;

2. Analytical (Benchmark) Monitoring.

Facilities in specific industrial sectors have semi-annual monitoring requirements during each year of permit coverage (there may be exemptions for representative discharges and low concentration waivers). Facilities with activities described in more than one sector are subject to the applicable benchmark monitoring requirements from each sector;

3. TMDL/Impaired Waters Monitoring.

Facilities that discharge industrial activity storm water to watersheds that have been designated as "impaired" may be subject to either "Impaired Waters" or "Total Maximum Daily Load" (TMDL) semi-annual monitoring requirements. The DEQ Regional Office will notify the facility when they receive permit coverage if they are subject to these requirements.

4. Quarterly Visual Examinations.

All facilities must perform quarterly visual examinations of their storm water discharges. These examinations provide the facilities with a tool for evaluating the effectiveness of the SWPPP. Samples are required for each outfall (except "representative" discharges), and the examination should include any observations of color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen, or other obvious indicators of storm water pollution. No analytical tests are required to be performed on these samples. The examination report must be maintained on site with the SWPPP.

D. Additional Storm Water Permitting Information.

Additional information and application forms are available from the DEQ Regional Offices (see Attachment 4 for the DEQ Regional Office storm water contacts and phone numbers), and the DEQ Central Office in Richmond (804/698-4086). DEQ also has storm water permitting information and application forms on the DEQ public web page at:

<http://www.deq.virginia.gov/Programs/Water/PermittingCompliance/PollutionDischargeElimination/StormWater.aspx>.

EPA's storm water information on the web is located at:

http://cfpub2.epa.gov/npdes/home.cfm?program_id=6

**CATEGORIES OF FACILITIES THAT DISCHARGE
STORM WATER ASSOCIATED WITH INDUSTRIAL ACTIVITY**

- (1) Facilities subject to storm water effluent limitations guidelines, new source performance standards, or toxic pollutant effluent standards under 40 CFR Subchapter N (except facilities with toxic pollutant effluent standards which are exempted under Category 10 of this definition);
- (2) Facilities classified as Standard Industrial Classifications (SIC) 24 (except 2434), 26 (except 265 and 267), 28 (except 283), 29, 311, 32 (except 323), 33, 3441, and 373;
- (3) Facilities classified as SIC 10 through 14 (mineral industry) including active and inactive mining operations (except for areas of coal mining operations which have been reclaimed and the performance bond has been released by the appropriate SMCRA authority, or non-coal mining operations which have been released from applicable State or Federal reclamation requirements after December 17, 1990) and oil and gas exploration, production, processing, or treatment operations with contaminated storm water discharges;
- (4) Hazardous waste treatment, storage, or disposal facilities, including those operating under interim status or a permit under subtitle C of RCRA;
- (5) Landfills, land application sites, and open dumps that receive or have received any industrial wastes (waste that is received from any of the facilities described under this definition, including construction activity wastes) including those that are subject to regulation under Subtitle D of RCRA;
- (6) Facilities involved in the recycling of materials, including metal scrapyards, battery reclaimers, salvage yards, and automobile junkyards, including but limited to those classified as SIC 5015 and 5093;
- (7) Steam electric power generating facilities, including coal handling sites;
- (8) Transportation facilities classified as SIC 40, 41, 42 (except 4221-4225), 43, 44, 45, and 5171 which have vehicle maintenance shops, equipment cleaning operations, or airport deicing operations. Only those portions of the facility that are either involved in vehicle maintenance (including vehicle rehabilitation, mechanical repairs, painting, fueling, and lubrication), equipment cleaning operation, airport deicing operation, or which are otherwise identified under Categories 1 through 7 or 9 and 10 of this definition are associated with industrial activity;
- (9) Treatment works treating domestic sewage or any other sewage sludge or wastewater treatment device or system used in the storage treatment, recycling, and reclamation of municipal or domestic sewage, including land dedicated to the disposal of sewage sludge that is located within the confines of the facility, with a design flow of 1.0 MGD or more, or required to have an approved POTW pretreatment program under the Permit Regulation. Not included are farm lands, domestic gardens or lands used for sludge management where sludge is beneficially reused and which are not physically located in the confines of the facility, or areas that are in compliance with Section 405 of the Clean Water Act;
- (10) Facilities under Standard Industrial Classifications 20, 21, 22, 23, 2434, 25, 265, 267, 27, 283, 285, 30, 31 (except 311), 323, 34 (except 3441), 35, 36, 37 (except 373), 38, 39, and 4221-25;

INDUSTRIAL SECTORS (AND ASSOCIATED SIC CODES) FOR FACILITIES REGULATED UNDER THE INDUSTRIAL STORM WATER GENERAL PERMIT

SIC Code or Activity Code	Activity Represented
Sector A: Timber Products	
2411	Log Storage and Handling (Wet deck storage areas are only authorized if no chemical additives are used in the spray water or applied to the logs).
2421	General Sawmills and Planning Mills.
2426	Hardwood Dimension and Flooring Mills.
2429	Special Product Sawmills, Not Elsewhere Classified.
2431-2439 (except 2434 - see Sector W)	Millwork, Veneer, Plywood, and Structural Wood.
2441, 2448, 2449	Wood Containers.
2451, 2452	Wood Buildings and Mobile Homes.
2491	Wood Preserving.
2493	Reconstituted Wood Products.
2499	Wood Products, Not Elsewhere Classified (includes SIC Code 2499-1303 – Wood, Mulch and Bark Facilities).
Sector B: Paper and Allied Products	
2611	Pulp Mills.
2621	Paper Mills.
2631	Paperboard Mills.
2652-2657	Paperboard Containers and Boxes.
2671-2679	Converted Paper and Paperboard Products, Except Containers and Boxes.
Sector C: Chemical and Allied Products	
2812-2819	Industrial Inorganic Chemicals.
2821-2824	Plastics Materials and Synthetic Resins, Synthetic Rubber, Cellulosic and Other Manmade Fibers Except Glass.
2833-2836	Medicinal Chemicals and Botanical Products; Pharmaceutical Preparations; In Vitro and In Vivo Diagnostic Substances; Biological Products, Except Diagnostic Substances.
2841-2844	Soaps, Detergents, and Cleaning Preparations; Perfumes, Cosmetics, and Other Toilet Preparations.
2851	Paints, Varnishes, Lacquers, Enamels, and Allied Products.
2861-2869	Industrial Organic Chemicals.
2873-2879	Agricultural Chemicals (includes SIC Code 2875 – Composting Facilities).
2891-2899	Miscellaneous Chemical Products.
3952 (limited to list)	Inks and Paints, Including China Painting Enamels, India Ink, Drawing Ink, Platinum Paints for Burnt Wood or Leather Work, Paints for China Painting, Artist's Paints and Artist's Watercolors.
Sector D: Asphalt Paving and Roofing Materials and Lubricants	
2951, 2952	Asphalt Paving and Roofing Materials.
2992, 2999	Miscellaneous Products of Petroleum and Coal.
Sector E: Glass Clay, Cement, Concrete, and Gypsum Products	
3211	Flat Glass.
3221, 3229	Glass and Glassware, Pressed or Blown.
3231	Glass Products Made of Purchased Glass.
3241	Hydraulic Cement.
3251-3259	Structural Clay Products.
3261-3269	Pottery and Related Products.
3274, 3275	Concrete, Gypsum and Plaster Products, Except: Concrete Block and Brick; Concrete Products, Except Block and Brick; and Ready-mixed Concrete Facilities (SIC 3271-3273).
3281	Cut Stone and Stone Products
3291-3299	Abrasive, Asbestos, and Miscellaneous Non-metallic Mineral Products.
Sector F: Primary Metals	
3312-3317	Steel Works, Blast Furnaces, and Rolling and Finishing Mills.
3321-3325	Iron and Steel Foundries.
3331-3339	Primary Smelting and Refining of Nonferrous Metals.
3341	Secondary Smelting and Refining of Nonferrous Metals.
3351-3357	Rolling, Drawing, and Extruding of Nonferrous Metals.
3363-3369	Nonferrous Foundries (Castings).
3398, 3399	Miscellaneous Primary Metal Products.
Sector G: Metal Mining (Ore Mining and Dressing)	
1011	Iron Ores.
1021	Copper Ores.
1031	Lead and Zinc Ores.
1041, 1044	Gold and Silver Ores.
1061	Ferroalloy Ores, Except Vanadium.
1081	Metal Mining Services.

1094, 1099	Miscellaneous Metal Ores.
Sector H: Coal Mines and Coal Mining Related Facilities	
1221-1241	Coal Mines and Coal Mining-Related Facilities.
Sector I: Oil and Gas Extraction and Refining	
1311	Crude Petroleum and Natural Gas.
1321	Natural Gas Liquids.
1381-1389	Oil and Gas Field Services.
2911	Petroleum Refineries.
Sector K: Hazardous Waste Treatment, Storage, or Disposal Facilities	
HZ	Hazardous Waste Treatment Storage or Disposal.
Sector L: Landfills and Land Application Sites	
LF	Landfills, Land Application Sites, and Open Dumps.
Sector M: Automobile Salvage Yards	
5015	Automobile Salvage Yards.
Sector N: Scrap Recycling Facilities	
5093	Scrap Recycling Facilities.
4499 (limited to list)	Dismantling Ships, Marine Salvaging, and Marine Wrecking - Ships For Scrap
Sector O: Steam Electric Generating Facilities	
SE	Steam Electric Generating Facilities.
Sector P: Land Transportation and Warehousing	
4011, 4013	Railroad Transportation.
4111-4173	Local and Highway Passenger Transportation.
4212-4231	Motor Freight Transportation and Warehousing.
4311	United States Postal Service.
5171	Petroleum Bulk Stations and Terminals.
Sector Q: Water Transportation	
4412-4499 (except 4499 facilities as specified in Sector N)	Water Transportation.
Sector R: Ship and Boat Building or Repairing Yards	
3731, 3732	Ship and Boat Building or Repairing Yards.
Sector S: Air Transportation	
4512-4581	Air Transportation Facilities.
Sector T: Treatment Works	
TW	Treatment Works.
Sector U: Food and Kindred Products	
2011-2015	Meat Products.
2021-2026	Dairy Products.
2032-2038	Canned, Frozen and Preserved Fruits, Vegetables and Food Specialties.
2041-2048	Grain Mill Products.
2051-2053	Bakery Products.
2061-2068	Sugar and Confectionery Products.
2074-2079	Fats and Oils.
2082-2087	Beverages.
2091-2099	Miscellaneous Food Preparations and Kindred Products.
2111-2141	Tobacco Products.
Sector V: Textile Mills, Apparel, and Other Fabric Product Manufacturing, Leather and Leather Products	
2211-2299	Textile Mill Products.
2311-2399	Apparel and Other Finished Products Made From Fabrics and Similar Materials.
3131-3199 (except 3111 - see Sector Z)	Leather and Leather Products, except Leather Tanning and Finishing.
Sector W: Furniture and Fixtures	
2434	Wood Kitchen Cabinets.
2511-2599	Furniture and Fixtures.
Sector X: Printing and Publishing	
2711-2796	Printing, Publishing, and Allied Industries.
Sector Y: Rubber, Miscellaneous Plastic Products, and Miscellaneous Manufacturing Industries.	
3011	Tires and Inner Tubes.
3021	Rubber and Plastics Footwear.
3052, 3053	Gaskets, Packing, and Sealing Devices and Rubber and Plastics Hose and Belting.
3061, 3069	Fabricated Rubber Products, Not Elsewhere Classified.
3081-3089	Miscellaneous Plastics Products.
3931	Musical Instruments.
3942-3949	Dolls, Toys, Games and Sporting and Athletic Goods.
3951-3955 (except 3952 facilities .. as specified in Sector C).	Pens, Pencils, and Other Artists' Materials.
3961, 3965	Costume Jewelry, Costume Novelties, Buttons, and Miscellaneous Notions, Except Precious Metal.
3991-3999	Miscellaneous Manufacturing Industries.

Sector Z: Leather Tanning and Finishing	
3111	Leather Tanning, Currying and Finishing.
Sector AA: Fabricated Metal Products	
3411-3499	Fabricated Metal Products, Except Machinery and Transportation Equipment.
3911-3915	Jewelry, Silverware, and Plated Ware
Sector AB: Transportation Equipment, Industrial or Commercial Machinery	
3511-3599 (except 3571-3579 - see Sector AC)	Industrial and Commercial Machinery (Except Computer and Office Equipment).
3711-3799 (except 3731, 3732 - ... see Sector R)	Transportation Equipment (Except Ship and Boat Building and Repairing).
Sector AC: Electronic, Electrical, Photographic, and Optical Goods	
3571-3579	Computer and Office Equipment.
3612-3699	Electronic, Electrical Equipment and Components, Except Computer Equipment.
3812-3873	Measuring, Analyzing and Controlling Instrument; Photographic and Optical Goods.
Sector AD: Non-Classified Facilities/Storm Water Discharges Designated By the Board As Requiring Permits	
N/A	Other Storm Water Discharges Designated By the Board As Needing a Permit (see 9 VAC 25-31-120 A 1 c) or Any Facility Discharging Storm Water Associated With Industrial Activity Not Described By Any of Sectors A-AC. Note: Facilities may not elect to be covered under Sector AD. Only the Director may assign a facility to Sector AD.

**DEPARTMENT OF ENVIRONMENTAL QUALITY
REGIONAL OFFICES and STORM WATER PERMIT CONTACTS**

BLUE RIDGE (BRRO)

Mr. Kip Foster (540) 562-6782
Main Switchboard (540) 562-6700

Department of Environmental Quality
Blue Ridge Regional Office - Roanoke
3019 Peters Creek Road
Roanoke, VA 24019

Main Switchboard (434) 582-5120

Department of Environmental Quality
Blue Ridge Regional Office - Lynchburg
7705 Timberlake Road
Lynchburg, VA 24502

NORTHERN VIRGINIA (NVRO)

Ms. Susan Mackert (703) 583-3853
Main Switchboard (703) 583-3800

Department of Environmental Quality
Northern Virginia Regional Office
13901 Crown Court
Woodbridge, VA 22193

PIEDMONT (PRO)

Ms. Joy Abel (804) 527-5197
Main Switchboard (804) 527-5020

Department of Environmental Quality
Piedmont Regional Office
4949-A Cox Road
Glen Allen, VA 23060-6295

SOUTHWEST (SWRO)

Mr. Davis Nishida (276) 676-4864
Main Switchboard (276) 676-4800

Department of Environmental Quality
Southwest Regional Office
355 Deadmore Street
P.O. Box 1688
Abingdon, VA 24212-1688

TIDEWATER (TRO)

Ms. Loan Pham (757) 518-2144
Main Switchboard (757) 518-2000

Department of Environmental Quality
Tidewater Regional Office
5636 Southern Blvd.
Virginia Beach, VA 23462

VALLEY (VRO)

Ms. Olive Critzer (540) 574-7877
Mr. Brandon Kiracofe (540) 574-7892
Main Switchboard (540) 574-7800

Department of Environmental Quality
Valley Regional Office
4411 Early Road
P.O. Box 3000
Harrisonburg, VA 22801

Cities and Counties Served By DEQ Regional Offices

BLUE RIDGE - ROANOKE (BRRO-R)

Counties:

Alleghany
Bedford
Botetourt
Craig
Floyd
Franklin
Giles
Henry
Montgomery
Patrick
Pulaski
Roanoke

Cities:

Bedford
Clifton Forge
Covington
Martinsville
Radford
Roanoke
Salem

BLUE RIDGE - LYNCHBURG (BRRO-L)

Counties:

Amherst
Appomattox
Buckingham
Campbell
Charlotte
Cumberland
Halifax
Lunenburg
Mecklenburg
Nottoway
Pittsylvania
Prince Edward

Cities:

Danville
Lynchburg
South Boston

NORTHERN VIRGINIA (NVRO)

Counties:

Arlington
Caroline
Culpeper
Fairfax
Fauquier
King George
Louisa
Loudoun
Madison

Orange
Prince William
Rappahannock
Spotsylvania
Stafford

Cities:

Alexandria
Fairfax
Falls Church
Fredericksburg
Manassas
Manassas Park

PIEDMONT (PRO)

Counties:

Amelia
Brunswick
Charles City
Chesterfield
Dinwiddie
Essex
Goochland
Gloucester
Greensville
Hanover
Henrico
King and Queen
King William
Lancaster
Mathews
Middlesex
New Kent
Northumberland
Powhatan
Prince George
Richmond
Surry
Sussex
Westmoreland

Cities:

Colonial Heights
Emporia
Hopewell
Petersburg
Richmond

SOUTHWEST (SWRO)

Counties:

Bland
Buchanan
Carroll
Dickenson
Grayson
Lee
Russell
Scott

Smyth
Tazewell
Washington
Wise
Wythe

Cities:

Bristol
Galax
Norton

TIDEWATER (TRO)

Counties:

Accomack
Isle of Wight
James City
Northampton
Southampton
York

Cities:

Chesapeake
Franklin
Hampton
Newport News
Norfolk
Poquoson
Portsmouth
Suffolk

Virginia Beach
Williamsburg

VALLEY (VRO)

Counties:

Albemarle
Augusta
Bath
Clarke
Fluvanna
Frederick
Greene
Highland
Nelson
Page
Rockbridge
Rockingham
Shenandoah
Warren

Cities:

Buena Vista
Charlottesville
Harrisonburg
Lexington
Staunton
Waynesboro
Winchester

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4411 Early Road
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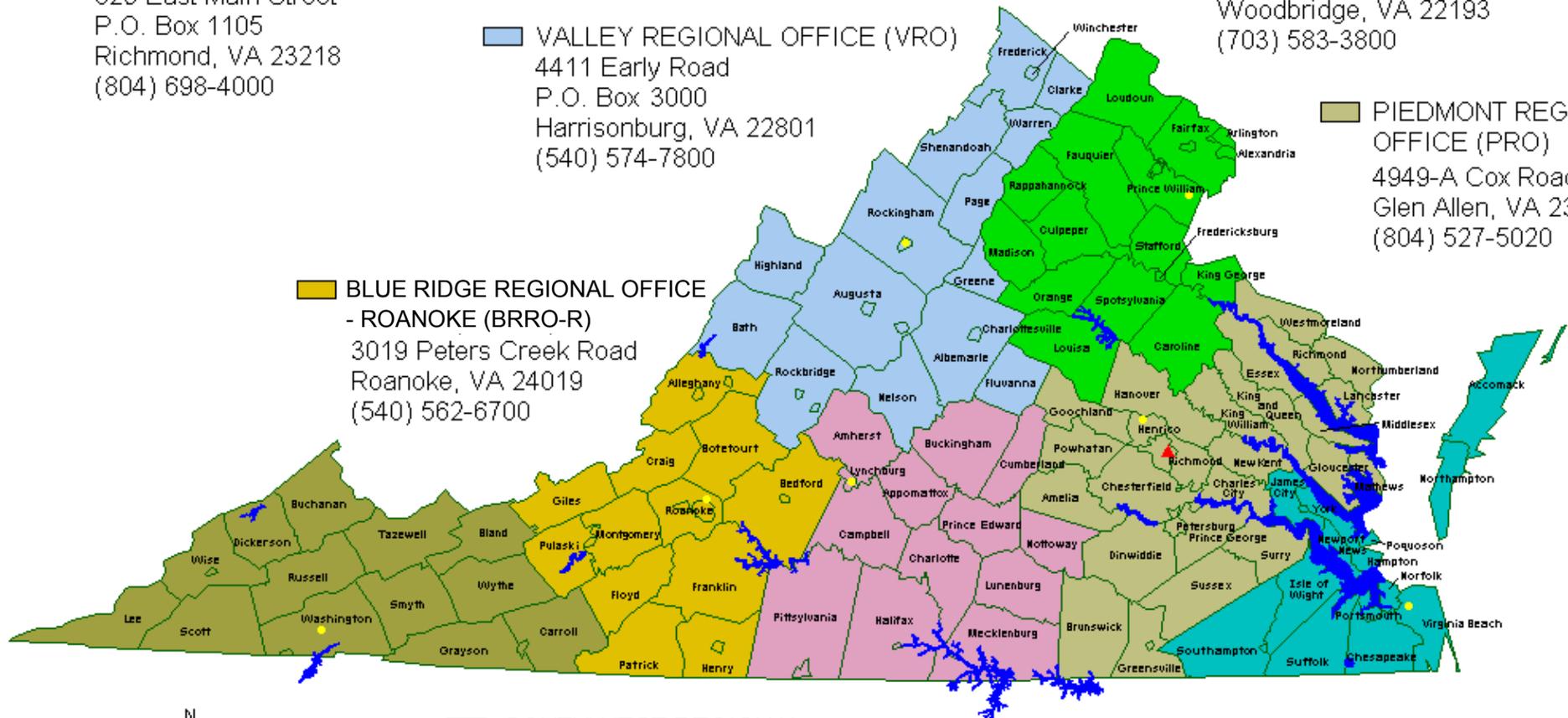
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