

**MS4 GENERAL PERMIT  
FOR SMALL MUNICIPAL  
SEPARATE STORM SEWER SYSTEMS  
(MS4s)**

**PERMIT REGISTRATION NUMBER:  
VAR040053**

**MS4 Program Plan  
Effective November 1, 2018  
Updated February 1, 2023**



City of Winchester, Virginia  
Rouss City Hall  
Department of Public Services  
15 North Cameron Street  
Winchester, VA 22601

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## 1.0 Introduction

The City of Winchester (City) operates an MS4 Permit that is regulated under the federal Clean Water Act and the Virginia State Water Control Law. Under these statutes, and their associated regulations, the City is required to develop, implement and maintain an MS4 Program that is designed to meet the following goals:

- Reduce the discharge of pollutants to the “maximum extent practicable” (MEP)
- Protect water quality
- Satisfy the appropriate water quality requirements of the State Water Control Law and its attendant regulations.

To insure that these goals are properly implemented, the City is required to obtain authorization to discharge stormwater under its MS4 Permit by registering under, and complying with, the General Permit for Discharges of Stormwater. The City’s registration number under the General Permit is VAR040053 and is effective from November 1, 2018 through October 31, 2023. The City will need to reapply for permit coverage ninety (90) days prior to the expiration date of permit coverage.

The General Permit establishes permit conditions and requirements that the City is required to comply with in order to ensure that minimum expectations for implementing an MS4 Program are met. The requirements established by the General Permit include six minimum control measures (MCMs). For each of the MCMs, the City is required to develop, implement, and refine measurable goals, Best Management Practices (BMPs), and schedules, as well as identify the City Departments responsible for each implementation.

The six MCMs are:

- Public Education and Outreach Program
- Public Involvement/Participation
- Illegal Discharge Detection and Elimination
- Construction Site Stormwater Runoff Control
- Post-Construction Stormwater Management in New Development and Redevelopment
- Pollution Prevention/Good Housekeeping for Municipal Operations

In addition to the six MCMs, the City is required to address two Special Conditions in order to satisfy the appropriate water quality conditions.

These Special Conditions are:

- Special conditions for the Local TMDL (Total Maximum Daily Load).
- Special condition for the Chesapeake Bay TMDL (Total Maximum Daily Load).

This MS4 Program Plan details the commitments necessary to comply with the General Permit for each of the MCMs and the Special Conditions. The City has been utilizing the 2013-2018 MS4 Program, but under the requirement with the new permit, effective November 1, 2018, the MS4 Program has been updated, effective May 1, 2019. The MS4 Program Plan must be updated annually as necessary and in conjunction with the submission of the MS4 Annual Report to the Virginia Department of Environmental Quality (DEQ).

### **Revisions to the MS4 program plan**

The MS4 Program is an iterative implementation process based on the success of pollutant load reduction and water quality protection. MS4 Program modifications and revisions are expected throughout the life of the General Permit.

Updates and revisions to the MS4 Program may be made under the General Permit in accordance with the following procedures:

The City shall summarize revisions to the MS4 program plan as part of the annual report as described in Part I D 2.

### ***Roles and Responsibilities***

The conditions of the General Permit and content of this MS4 Program Plan are enforceable via the United States Environmental Protection Agency (EPA), DEQ, third parties and are applicable to all City activities and operations. Unless otherwise noted, the City's Engineering Division, led by the City Engineer, is responsible for implementing the commitments in this MS4 Program Plan. For more information regarding roles and responsibilities contact the Engineering Division at:

Phone: 540-667-1815

E-mail: [engineering@winchesterva.gov](mailto:engineering@winchesterva.gov)

### ***Other Specific Roles and Responsibilities***

The City's Department of Fire and Rescue, led by the Fire and Rescue Chief, is responsible for implementation of:

- BMP 3.7: Hazardous Spill Response

The City's Public Works Division, led by the Refuse & Recycling Coordinator, is responsible for the implementation of:

- BMP 3.8: Household Hazardous Waste Collection
- BMP 3.9: Household Waste Reduction

The City's Public Works Division and the City's Parks and Recreation Division, led by the Public Works Operations Superintendent and the Parks Superintendent, respectively, are responsible for implementation of:

- BMP 5.5: City-Owned Stormwater Management Facility Maintenance

The City's Public Works Division, led by the Public Works Operations Superintendent, is responsible for implementation of:

- BMP 6.6: Street Sweeping

## Signatory Authorization

In accordance with Part III K of the General Permit, the following individuals, listed by job title, are hereby duly authorized to sign all reports and other requested information:

Public Services Director  
City Engineer

## 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."

Eden E. Freeman  
**Printed Name**

City Manager  
**Title**

\_\_\_\_\_  
**Signature**

\_\_\_\_\_  
**Date**

VAR040053  
**Permit Number**

City of Winchester  
**MS4 Name**

## 2.0 Minimum Control Measures

### MCM 1. Public Education and Outreach

#### *Requirements*

The City's Public Education and Outreach Programs are centered around information provided and distributed through its Stormwater Website. In addition, the City promotes stormwater awareness through participation in public events, occasional mass mailings, and the implementation of an educational program for school-aged children. For more information, Appendix A of this MS4 Program Plan provides information on the City's Public Education and Outreach Plan.

Under the requirement of MCM 1, the City shall provide the following:

- A list of at least three (3) high-priority stormwater issues the City will communicate to the public as part of the public education and outreach program (shown in Appendix A).
- The rationale for selection of each high-priority stormwater issue and an explanation of how each education, or outreach strategy, is intended to have a positive impact on stormwater discharges (shown in Appendix A).
- Identification of the public audience to receive each high-priority stormwater message (shown in Appendix A).
- The strategies from Table 1 of Part I E 1 d to be used to communicate each high-priority stormwater message (shown in Appendix A).
- The anticipated time periods the messages will be communicated or made available to the public (shown in Appendix A).



## Measurable Goals

The City has identified the following measurable goals for evaluating compliance with the General Permit:

- The City will disseminate public education and outreach messages to the target audiences identified in its High-Priority Water Quality Issue Selection Matrix.
- The City will continue to maintain and update as necessary the Public Education and Outreach Program.
- The City will, as necessary, develop new messages or modify existing ones to more appropriately address the identified target audiences.
- The City will annually request for public input to re-evaluate the Public Education and Outreach Program.

## BMPs Selected for Implementation

The City will implement and maintain the City of Winchester Public Education and Outreach Plan 2019 edition to meet the identified measurable goals identified above.

In addition, the City has the following BMPs to utilize for each year's annual Public Education Outreach Plan.

**Table 1: BMPs Selected for Implementation – MCM 1**

BMP	Names	Description	Reporting Items
1.1	City Stormwater Webpage	The City will maintain a web page dedicated to the City's stormwater management program. The MS4 Program Plan, MS4 Annual Reports and other information will be made available to the public through this website. Once a year, in conjunction with development of the MS4 Annual Report, the City will ensure the validity of all links to stormwater information included on the web page.	Confirmation statement of the MS4 Program Plan posted/updated on the Stormwater webpage
1.2	Social Media	The City will use its Facebook and Twitter accounts as necessary to distribute stormwater related information.	Links to the City's Facebook and Twitter.

1.3	Public Events	The City will participate in public events such as the Community Wellness Festival, as necessary, to distribute stormwater related information to the citizens.	List of the dates and events/presentations during reporting period.
1.4	Publications (Print and Electronic)	The City will use publications to distribute stormwater related information to its citizens.	List of Publications utilized during the reporting period.
1.5	Watershed and Stormwater Educational Opportunities	The City will continue to implement its Watershed and Stormwater Education Opportunity. The City will concentrate on delivery of this program to school aged children in a manner necessary to insure that high priority water quality issues are addressed to the target audiences.	List of the dates and schools and/or educational facilities attended during the reporting period.
1.6	Other Message Delivery	The City will utilize other types of message delivery; as necessary. Such as “Clean Up After Your Dog” signage at the City’s Dog Park.	List of Other Message Delivery during the reporting period.
1.7	Educational Materials	The City will retain copies (electronic and/or hard copy) of educational materials utilized in delivery of its messages regarding high priority water quality issues to target audiences.	List of educational materials utilized during the reporting period.

The City can and will add to this list of BMPs, as necessary, if during the permit cycle it determines there are significant weaknesses or shortcomings.

The Measurable Goal/BMP Relationship Matrix in Table 2 demonstrates which BMPs are expected to be used to meet each measurable goal for MCM 1.

**Table 2: Measurable Goal/BMP Relationship Matrix – MCM 1**

Measurable Goals	BMP 1.1	BMP 1.2	BMP 1.3	BMP 1.4	BMP 1.5	BMP 1.6	BMP 1.7
The City will disseminate public education and outreach messages to the target audiences identified in its High-Priority Water Quality Issue Selection Matrix.	X	X	X	X	X	X	X
The City will continue to maintain and update as necessary the Public Education and Outreach Program.		X	X	X	X	X	X
The City will, as necessary, develop new messages, or modify existing ones, to more appropriately address the identified target audiences.		X		X		X	X
The City will annually request public input to re-evaluate the Public Education and Outreach Program.	X	X		X		X	

### ***MS4 Annual Reporting***

The City must include the following as part of its MS4 Annual Report:

#### ***General Permit Reporting Requirements***

- A list of the high-priority stormwater issues the City addressed through public education and outreach programs.
- A list of the strategies used to communicate each high-priority stormwater issue.

#### ***BMP Specific Reporting Requirements***

In addition to the General Permit reporting requirements, the MS4 Annual Report must include the specific BMP reporting items identified in Table 1.

### ***MS4 Program Plan MCM 1 Specific Update Requirements***

As of May 1, 2019, there are no mandated updates to MCM 1 identified in the MS4 General Permit scheduled for the duration of the permit cycle.

## **MCM 2. Public Involvement and Participation**

### ***Summary of the Requirements***

Under the General Permit, the City is required to promote and encourage public involvement and participation. Involving the public requires that the City provide access and the ability for public comment concerning the City's MS4 Program Plan and MS4 Annual Reports, as well as, follow public notice requirements. The City is also required to promote programs that are aimed at increasing public participation to reduce stormwater pollutant loads, improve water quality, and support local restoration/clean-up projects, programs, groups, meetings, or other similar opportunities.

The City is required to develop and implement procedures for the following:

- Public participation with regards to reporting potential illicit discharges, improper disposal, or spills.
- Complaints regarding land disturbing activities, or other potential stormwater pollution concerns
- Public input concerning the City's MS4 Program Plan
- Response to public input received about the MS4 Program Plan or complaints
- Maintenance of documentation detailing public input received about the MS4 Program, MS4 Program Plan and the permittee's response.

The City is required to implement at least four (4) activities per year from two (2) or more categories listed in Table 3 in order to provide an opportunity for public involvement resulting in water quality improvement and to support local restoration/clean-up projects.

This MS4 Program Plan shall include:

- A webpage that provides mechanisms for the public to report:
  - Potential illicit discharges, improper disposal, or spills
  - Complaints regarding land disturbing activities
  - Other potential stormwater pollution concerns
- A webpage address that provides a way for public input on the permittee's MS4 Program
- Description of the public involvement activities to be implemented by the permittee, the anticipated time period the activities will occur, and a metric for each activity to determine if the activity is beneficial to water quality.

**Table 3: Public Involvement Opportunities**

<b>Public Involvement Opportunities</b>	<b>Examples</b>
Monitoring	Establish or support citizen monitoring group
Restoration	Stream or watershed clean-up day, adopt-a-water way program
Educational events	Booth at community fair, demonstration of stormwater control projects, presentation of stormwater materials to schools to meet application education Standards of Learning of curriculum requirements, watershed walks, participation on environmental advisory committees
Disposal or collection events	Household hazardous chemicals collection, vehicle fluid collection
Pollution prevention	Adopt-a-storm drain program, implement a storm drain marking program, promote use of residential stormwater BMPs, implement pet waste stations in public areas, adopt-a-street program.

### ***Measurable Goals***

The City has identified the following measurable goals for evaluating compliance with the General Permit:

- The City will continue to comply with the applicable public notice requirements.
- The City will update as necessary the MS4 Program Plan in conjunction with development of the MS4 Annual Report.
- The City will post a copy of its updated MS4 Program Plan online within thirty (30) days of submittal of its MS4 Annual Report to DEQ.
- The City will post a copy of its updated MS4 Annual Report online within thirty (30) days of its submittal to DEQ.
- The City will utilize the Stormwater Complaint Hotline and the City’s 311 System to receive complaints regarding stormwater issues and illicit discharges.

- The City will implement and maintain an MS4 Program Plan and MS4 Annual Report public input/feedback mechanism located on the stormwater webpage.

### *BMPs Selected for Implementation*

The City has selected the following BMPs to meet the measurable goals for MCM 2. Selected BMPs are as follows:

**Table 4: BMPs Selected for Implementation – MCM 2**

<b>BMP</b>	<b>Names</b>	<b>Description</b>	<b>Reporting Items</b>
2.1	Public Announcements	The City will provide public notification of all public meetings and hearings in accordance with any applicable federal, state, and local public notice requirements.	N/A
2.2	Public MS4 program Information Access and Feedback	The City will provide the public access to the most updated MS4 Program Plan and MS4 Annual Reports, which is located on the City’s Stormwater Webpage (BMP 1.1). There is a section for the public to provide feedback as well. Copies of each year’s annual report will be retained on-line for the length of the current General Permit.	Link to the City webpage containing the MS4 Program Plan and MS4 Annual Report
2.3	Stormwater Complaint Hotline & City’s 311 System	The City will maintain its current stormwater complaint hotlines to encourage public reporting and involvement. The City promotes 540-662-4131 for reporting urgent issues such as illegal dumping and spills. The City promotes 540-542-1346 for reporting of less urgent issues such as maintenance issues, erosion and sediment control complaints. The City promotes and maintains an online reporting system for stormwater complains.	Citizen Complaints will be noted in a spreadsheet located in the annual report

2.4	Promotion of the Local Environmental Events	The City will annually promote a total of four events encouraging public participation and involvement including Household Hazardous Collection Days and Adopt-A-Stream. The City will promote these activities through use of its public education and outreach BMPs.	Dates and name of the environmental events.
2.5	Promotion of the Household Hazardous Waste Collection Days	The City will continue to promote the joint Frederick County/Winchester Household Hazardous Waste Collection Days program. The City will promote the Household Hazardous Waste Collection Days as one of its four local participation programs and will contribute to its implementation by providing pick-up and disposal of trash and debris collected by the participants.	Dates of household hazardous waste collection days
2.6	Sponsorship of Adopt-A-Stream Program.	The City will continue to promote Adopt-A-Stream program by sponsoring an annual stream clean-up day. In addition, the City will sponsor an Adopt-A-Stream Stream Clean-Up Day as one of its four local participation programs and will contribute to its implementation by providing pick-up and disposal of trash and debris collected by the participants.	Date of Adopt-A-Stream Clean-Up Day

To meet the measurable goals identified for MCM 2, the City will also utilize the following BMPs:

- BMP 1.1: Stormwater Webpage
- BMP 1.2: Social Media
- BMP 1.3: Public Events
- BMP 1.4: Publications (Print and Electronic)
- BMP 1.7: Educational Materials

The Measurable Goal/BMP Relationship Matrix in Table 5 demonstrates which BMPs will be used to meet each measurable goal for MCM 2.

**Table 5: Measurable Goal/BMP Relationship Matrix – MCM 2**

Measurable Goals	BMP 1.1	BMP 1.2	BMP 1.3	BMP 1.4	BMP 1.7	BMP 2.1	BMP 2.2	BMP 2.3	BMP 2.4	BMP 2.5	BMP 2.6
The City will continue to comply with the applicable public notice requirements.	X	X		X	X	X	X				
The City will update as necessary the MS4 Program Plan in conjunction with the development of the MS4 Annual Report.	X			X		X	X				
The City will post a copy of its updated MS4 Program Plan on-line within thirty (30) days of submittal of its MS4 Annual Report to DEQ.	X			X		X	X				
The City will post a copy of its updated MS4 Annual Report online within thirty (30) days of its submittal to DEQ.	X			X		X	X				
The City will utilize the Stormwater Complaint Hotline and the City's 311 System to receive complaints regarding stormwater issues and illicit discharges.	X			X		X	X				
The City will implement and maintain a MS4 Program Plan and MS4 Annual Report public input/feedback mechanism located on the stormwater webpage.	X	X	X	X	X	X	X	X	X	X	X



## ***MS4 Annual Reporting***

The City must include the following as part of its MS4 annual report:

### ***General Permit Reporting Requirements***

- A summary of any public input on the MS4 program received (including stormwater complaints) and how the City responded
- A webpage to the City's MS4 program and stormwater website
- A description of the public involvement activities implemented by the permittee
- 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
- The name of other MS4 permittees with whom the City collaborated in the public involvement opportunities.

### ***BMP Specific Reporting Requirements***

In addition to the General Permit reporting requirements, the MS4 Annual Report must include the specific BMP reporting items identified in Table 4.

## ***MS4 Program Plan MCM 2 Specific Update Requirements***

### ***Requirement # 1 (Due: February 1, 2019) – Webpage Update***

No later than three (3) months after this permit's effective date, the City is required to maintain a webpage dedicated to the MS4 program and stormwater pollution prevention. The following information shall be posted on this webpage:

- Effective MS4 permit and coverage letter.
- Most current MS4 Program Plan or location where the MS4 Program Plan can be obtained.
- Annual Report for each year of the term covered by this permit no later than 30 days after submittal to the department.
- Mechanisms for the public to report potential illicit discharges, improper disposal, or spills to the MS4, complaints regarding land disturbing activities, or other potential stormwater pollution concerns.
- Methods for how the public can provide input on the City's MS4 program.

## **MCM 3. Illicit Discharge Detection and Elimination**

### ***Summary of the Requirements***

Under the General Permit, the City of Winchester is required to develop procedures and tools in the design and implementation of the MS4 Program Plan for detection, identification, and elimination of all illicit and illegal discharges.

Under the MCM 3 requirements, the City must include:

- The MS4 map and information table required by Part I E 3 a. The map and information table may be incorporated into the MS4 Program Plan by reference. The map shall be made available to the department within 14 days upon request.
- Copies of written notifications of new physical interconnections given by the permittee to other MS4s.
- The IDDE procedures described in Part I E 3 c.

The City's Standard Operating Procedures Manual for Illicit Discharge, Detection, and Elimination can be found in Appendix B.

### ***Measurable Goals***

The City has identified the following measurable goals for evaluating compliance with the General Permit:

- The City will maintain a storm sewer system map and information table that includes all MS4 outfalls owned or operated by the City within the census urbanized area identified by the 2010 decennial census.
- The City will maintain a copy of the current storm sewer system map and outfall information table for review upon request.
- The City will continue to identify other points of discharge.
- The City will notify, in writing, MS4 operators of any known City points of discharge that enter the downstream MS4 prior to discharge into an MS4 outfall.
- The City will maintain legal authority to investigate and require elimination of illicit discharges and illegal dumping, identified as entering its MS4 system.
- The City will develop, implement, and update, when appropriate, written procedures to detect, identify, and address unauthorized non-stormwater discharges, including illicit discharges and illegal dumping, to the small MS4.
- The City will develop a prioritized list of and conduct dry weather field screening on at least fifty (50) MS4 Outfalls annually.
- The City will conduct follow-up on any suspect discharges identified during dry-weather field screening.

- The City will track all investigations and document the date that the illicit discharge was observed and reported, the results of the investigation, any required follow-up, resolution of the investigation, and the date that the investigation was closed.
- The City will maintain a Stormwater Management hotline and the City’s 311 System for reporting of stormwater related issues including illicit discharges and illegal dumping.
- The City will provide emergency response to reported hazardous material spills and accidental releases.
- The City will provide household hazardous waste collection services to City residents.
- The City will provide scheduled trash and waste collection services to City residents.
- The City will continue efforts to eliminate sanitary sewer seepage from entering into the MS4 system.

***BMPs Selected for Implementation***

The City has selected the following BMPs to meet the measurable goals for MCM 3.

Selected BMPs are as follows:

**Table 6: BMPs Selected for Implementation – MCM 3**

BMP	Names	Description	Reporting Items
3.1	Storm Sewer Infrastructure and Outfall Mapping	The City will maintain a stormwater infrastructure layer as part of its overall GIS program. The General Public will be able to access the stormwater infrastructure layer using the City’s interactive mapping program. The City will maintain an MS4 Outfall layer that identifies the location of the City’s MS4 outfalls. Digital maps can be requested by completion of the GIS User Agreement found at <a href="http://www.winchesterva.gov/sites/default/files/documents/gis/gis-user-agreement.pdf">http://www.winchesterva.gov/sites/default/files/documents/gis/gis-user-agreement.pdf</a> . The requestor must pay any associated fees prior to delivery of the digital information	The MS4 Outfall Map and Information Table are available by request

3.2	MS4 Operator Coordination	The City will provide written notification to downstream MS4 operators where it identifies that the City's MS4 infrastructure is physically connected.	Name of MS4 Operator notified and date of notification
3.3	Legal Authority	The City will maintain legal authority prohibiting illicit discharges into the MS4 system. The legal authority will also identify those non-stormwater discharges allowed to be discharged into the MS4 system. This legal authority is established at Chapter 9, Section III of the Code of Winchester.	N/A
3.4	IDDE Investigation and Follow-Up	The City will investigate and conduct follow-up on suspect discharges in accordance to procedures included in the Illicit Discharge Detection and Elimination (IDDE) Standard Operating Procedures Manual, May 2019 edition.	Number of Illicit Discharges investigated; Number of Illicit Discharges reported; Summary of follow-ups for suspect discharges as a result of field screening.
3.5	MS4 Outfall Dry Weather Field Screening	The City will conduct dry weather screening on fifty (50) MS4 outfalls annually using procedures included in the Illicit Discharge Detection and Elimination (IDDE) Standard Operating Procedures Manual, May 2019 edition.	Number of outfalls screened; Number of outfalls with suspect discharges as a result of field screening
3.6	Illicit Discharge Tracking and Documentation	The City will track and document suspect and illicit discharges, as well as, City investigation, follow-up and enforcement actions in accordance to procedures included in the Illicit Discharge Detection and Elimination (IDDE) Standard	Summary of IDDE

		Operation Procedures Manual, May 2019 edition.	
3.7	Hazardous Spill Response	The City, in cooperation with Frederick County, will provide emergency response to hazardous material spills and accidental chemical releases.	N/A
3.8	Household Hazardous Waste Collection	The City, in cooperation with Frederick County, will continue to provide household hazardous waste collection opportunities for its residents. The collection schedule will be promoted through use of the City's social media and Cit-E newsletter.	List collection dates
3.9	Household Waste Reduction	The City will continue to provide weekly waste collection services for City residents. In addition, the City will continue to provide fall leaf collection services, yard waste collection services and bulky waste collection services to City residences. Schedules for these services will be placed on the City's Public Works web page regarding refuse and recycling ( <a href="http://www.winchesterva.gov/public-works/refuse">http://www.winchesterva.gov/public-works/refuse</a> )	Approximate tonnage of household waste collected; Approximate tonnage of recycled materials (paper/cardboard, bottles/cans/plastic, scrap metal); Approximate tonnage of yard waste collected; Number of Recycling bins provided
3.10	Elimination of Sanitary Sewage Seepage from Public Sewers	The City will continue, as part of its sanitary sewer utilities program, implementation of its inflow and infiltration program to replace or slip line sanitary sewers to prevent illicit discharge. The lever of implementation of this BMP each year will be established by the City	Approximate number of linear feet of sewer line replaced; Approximate number of sanitary sewer pipe slip lined;

		Council as part of annual budget approval.	Number of Sanitary sewer manholes repaired/replaced
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To meet the measurable goals identified for IDDE, the City will also utilize the following BMPs:

- BMP 2.3: Stormwater Complaint Hotline & City’s 311 System
- BMP 6.5: Staff Training

The Measurable Goal/BMP Relationship Matrix in Table 7 demonstrates which BMPs are expected to be used to meet each measurable goal for MCM 3.

**Table 7: Measurable Goal/BMP Relationship Matrix – MCM 3**

Measurable Goals	BMP 2.3	BMP 3.1	BMP 3.2	BMP 3.3	BMP 3.4	BMP 3.5	BMP 3.6	BMP 3.7	BMP 3.8	BMP 3.9	BMP 3.10	BMP 6.5
The City will maintain a storm sewer system map and information table that includes all MS4 outfalls owned or operated by the City within the census urbanized area identified by the 2010 decennial census.		X				X	X				X	X
The City will maintain a copy of the current storm sewer system map and outfall information table for review upon request.		X										
The City will continue to identify other points of discharge.	X	X			X	X	X	X			X	X
The City will notify, in writing, MS4 operators of any known City points of discharge that enter the downstream MS4 prior to discharge into an MS4 outfall.		X	X		X	X						
The City will maintain legal authority to investigate and require elimination of illicit discharges and illegal dumping, identified as entering its MS4 system.	X			X	X		X	X			X	X
The City will develop, implement, and update, when appropriate, written procedures to detect, identify, and address unauthorized non-stormwater discharges, including illicit discharges and illegal dumping, to the small MS4.	X	X		X	X	X	X				X	X
The City will develop a prioritized list of, and conduct dry weather field screening on, fifty (50) MS4 Outfalls annually.	X	X				X					X	X

<b>Measurable Goals</b>	<b>BMP 2.3</b>	<b>BMP 3.1</b>	<b>BMP 3.2</b>	<b>BMP 3.3</b>	<b>BMP 3.4</b>	<b>BMP 3.5</b>	<b>BMP 3.6</b>	<b>BMP 3.7</b>	<b>BMP 3.8</b>	<b>BMP 3.9</b>	<b>BMP 3.10</b>	<b>BMP 6.5</b>
The City will conduct follow-up on any suspect discharges identified during dry-weather field screening.		X		X	X	X	X				X	X
The City will track all investigations and document the date that the illicit discharge was observed and reported, the results of the investigation, any required follow-up, resolution of the investigation, and the date that the investigation was closed.	X	X		X	X		X				X	X
The City will maintain a Stormwater Management hotline and the City's 311 System for reporting of stormwater related issues including illicit discharges and illegal dumping.	X	X		X	X		X	X			X	
The City will provide emergency response to reported hazardous material spills and accidental releases.	X	X		X	X			X				
The City will provide household hazardous waste collection services to City residents.						X	X		X	X		
The City will provide scheduled trash and waste collection services to City residents.						X	X		X	X		
The City will continue efforts to eliminate sanitary sewer seepage from entering into the MS4 system.	X	X	X	X	X	X					X	X



## ***MS4 Annual Reporting***

The City must include the following as part of its MS4 Annual Report:

### ***General Permit Reporting Requirements***

- 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.
- Total number of outfalls screened during the reporting period as part of the dry weather screening program.
- List of illicit discharges to the MS4 including spills reaching the MS4 with information as follows:
  - Source of illicit discharge
  - Dates that the discharge was observed, reported, or both
  - Whether the discharge was discovered by the permittee during dry weather screening, reported by the public, or other method (describe)
  - How the investigation was resolved
  - Description of any follow-up activities
  - Date the investigation was closed

### ***BMP Specific Reporting Requirements***

In addition to the General Permit reporting requirements, the MS4 Annual Report must include the specific BMP reporting items identified in Table 6.

## ***MS4 Program Plan MCM 3 Specific Update Requirements***

### ***Requirement # 1 (Due: July 1, 2019) – GIS-compatible shapefile or PDF of MS4 map***

No later than July 1, 2019, the City shall submit to DEQ a GIS-compatible shapefile of the City's MS4 map as described in Part I E 3 a. If the City does not have an MS4 map in a GIS format, the City shall provide the map as a PDF document.

## **MCM 4. Construction Site Stormwater Runoff Control**

### ***Summary of the Requirements***

Under the General Permit, the City is required to implement a Virginia Erosion and Sediment Control Program (VESCP) that is consistent with the Virginia Erosion and Sediment Control Law (§ 62.1-44.15:51 et seq. of the Code of Virginia) and Virginia Erosion and Sediment Control Regulations (9VAC25-840).

The City is also required to implement appropriate controls to prevent non-stormwater discharges to the MS4, such as wastewater, concrete washout, fuels and oils, and other illicit discharges identified during land disturbing activity inspections of the MS4. The discharge of non-stormwater discharges other than those identified in 9VAC25-890-20 D through the MS4 is not authorized under this MS4 General Permit.

The Construction Site Stormwater Runoff Control Program shall specifically include:

- The local ordinance citations for the VESCP program.
- A description of the legal authorities utilized to ensure compliance with Part I E 4 to control construction site stormwater runoff control such as ordinances, permits, orders, specific contract language, and inter-jurisdictional agreements.
- Written inspection procedures to ensure the erosion and sediment controls are properly implemented and all associated documents utilized during inspection including the inspection schedule.
- Written procedures for requiring compliance through corrective action or enforcement action to the extent allowable under federal, state, or local law, regulation, ordinance, or other legal mechanisms.

Documents and other reference materials used by the City for implementation of the Construction Site Stormwater Runoff Control Program are listed in Table 5 and Table 16.

### ***Measurable Goals***

The following measurable goals are included in the updated MS4 Program Plan for MCM 4:

- The City's ESC Program will be found consistent during any programmatic Evaluation by DEQ.
- The City will review ESC plans for land disturbing activities for compliance with Chapter 9 Article 2 of the Winchester City Code.
- The City will require an agreement in lieu of plan for single family residential land disturbing activities.
- City employees will maintain the appropriate certifications required for plan review, inspection and administration of the City's ESC Program.

- All regulated land disturbing activities will be required to identify a Responsible Land Developer.
- The City will use its legal authority to require that a land disturbing activity has an approved ESC Plan or agreement in lieu of plan prior to land disturbance.
- The City will utilize and maintain the stormwater complaint hotline and the City 311 System as the mechanisms for the public to report citizen complaints regarding construction stormwater.
- The City will continue to implement a land disturbing activity inspection schedule in accordance with Chapter 9 Article 2 of the Winchester City Code.
- The City will use its legal authority to require control of construction wastes at land disturbing activities.
- The City will require that land disturbing activities regulated under the Virginia Stormwater Management Program (VSMP) Construction Stormwater Program obtain VPDES Permit coverage prior to land disturbance.

***BMPs Selected for Implementation***

The City has selected the following BMPs to meet the measurable goals for MCM 4.

Selected BMPs are as follows:

**Table 8: BMPs Selected for Implementation – MCM 4**

<b>BMP</b>	<b>Names</b>	<b>Description</b>	<b>Reporting Items</b>
4.1	Legal Authority – ESC	The City will maintain legal authority for implementation of a local erosion and sediment control program consistent with 9VAC25-840-10 et. seq. This legal authority is established at Chapter 9 of the Code of Winchester.	N/A
4.2	Land Disturbing Activity Plan Review	The City will require submission of complete Land Disturbance Permit Application and Virginia Stormwater Management Program Permit Packages for regulated land disturbance activities. The City will review the packages for compliance with Chapter 9, Article 2 of the City Code (Erosion Control) and Chapter 9, Article 3 of the City Code (Stormwater Management) by reviewing the checklists included in	Number of Land-disturbance plans submitted; Number of Land-disturbance plans reviewed; Number of Land-disturbance plans approved

		<p>the permit application packages. Approval for land disturbance will not be given by the City until an application is approved.</p>	
4.3	<p>VPDES Construction Activity Permit Coordination</p>	<p>The City will not authorize initiation of land disturbance activities until it receives evidence that the applicant has applied for and obtained coverage under the Virginia General Permit for Discharges of Stormwater from Construction Activities for construction activity, including a general permit registration statement as required under City Code Section 9-50.</p>	<p>Number of VPDES General Permit for the Discharge of Stormwater from Construction Activities permits required</p>
4.4	<p>Land Disturbing Activity Inspections</p>	<p>The City will maintain a land disturbance inspection program that is consistent with the requirements of Section 9-39 of the City Code. In addition, as part of these inspections, the City will inspect sites for compliance with Section 9-58 of the City Code requiring implementation of a pollution prevention plan and Section 9-67 of the City Code requiring compliance with the approved stormwater management plan. The City will enforce these requirements as authorized and in accordance to Chapter 9 of the City Code.</p>	<p>Number of inspections; Number of and type of enforcement actions taken</p>
4.5	<p>Land Disturbing Activity Tracking and Recordkeeping</p>	<p>The City has an existing program to track land disturbance activities to provide the necessary information for routine inspections, as-built inspections, surveys, and determining which areas may be most likely to incur heavier than normal sediment loading. Plan approval records and inspections will be tracked and documented in the City's digital records system, SunGard.</p>	<p>Number of Land- disturbance plans submitted; Number of Land- disturbance plans reviewed; Number of Land- disturbance plans approved.</p>

To meet the measurable goals identified for MCM 4, the City will also utilize the following BMPs:

- BMP 2.3: Stormwater Complaint Hotline & City’s 311 System
- BMP 6.5: Staff Training

The Measurable Goal/BMP Relationship Matrix in Table 9 demonstrates which BMPs will be used to meet each Measurable Goal for MCM 4.

**Table 9: Measurable Goal/BMP Relationship Matrix – MCM 4**

Measurable Goals	BMP 2.3	BMP 4.1	BMP 4.2	BMP 4.3	BMP 4.4	BMP 4.5	BMP 6.5
The City’s ESC Program will be found consistent during any programmatic Evaluation by DEQ.			X	X	X	X	X
The City will review ESC plans for land disturbing activities for compliance with Chapter 9 Article 2 of the Winchester City Code.		X	X			X	
The City will require an agreement in lieu of plan for single family residential land disturbing activities.			X	X		X	
City employees will maintain the appropriate certifications required for plan review, inspection and administration of the City’s ESC Program.			X			X	X
All regulated land disturbing activities will be required to identify a Responsible Land Developer.			X		X	X	
The City will use its legal authority to require that a land disturbing activity has an approved ESC Plan or agreement in lieu of plan prior to land disturbance.		X	X	X	X	X	
The City will utilize and maintain the stormwater complaint hotline and the City 311 System as the mechanisms for the public to report citizen complaints regarding construction stormwater.	X					X	
The City will continue to implement a land disturbing activity inspection schedule in accordance with Chapter 9 Article 2 of the Winchester City Code.					X	X	X
The City will use its legal authority to require control of construction wastes at land disturbing activities.		X				X	
The City will require that land disturbing activities regulated under the Virginia Stormwater Management Program (VSMP) Construction Stormwater Program obtain VPDES Permit coverage prior to land disturbance.				X		X	

## ***MS4 Annual Reporting***

The City must include the following as part of its MS4 Annual Report:

### ***General Permit Reporting Requirements***

- Total number of inspections conducted
- Total number and type of enforcement actions implemented

### ***BMP Specific Reporting Requirements***

In addition to the General Permit reporting requirements, the MS4 Annual Report must include the specific BMP reporting items identified in Table 8.

## ***MS4 Program Plan MCM 4 Specific Update Requirements***

As of May 1, 2019, there are no mandated updates to MCM 4 identified in the MS4 General Permit scheduled for the duration of the permit cycle.

## **MCM 5. Post-Construction Stormwater Management for New Development and Development on Prior Developed Lands**

### ***Summary of the Requirements***

Under the General Permit, the City is required to implement a Post-Construction Stormwater Management Program for New Development and Redevelopment designed to address discharges entering the MS4.

The Post-Construction Stormwater Management Program for New Development and Redevelopment shall specifically include:

- A copy of the VSMP approval letter issued by the department.
- Written inspection procedures and all associated documents utilized in the inspection of privately owned stormwater management facilities.
- Written procedures for compliance and enforcement of inspection and maintenance requirements for privately owned BMPs.
- A description of the legal authorities utilized to ensure compliance with Part I E 5 a for post-construction stormwater runoff control such as ordinances (provide citation as appropriate), permits, orders, specific contract language, and interjurisdictional agreements.
- Written inspection procedures and all associated documents utilized during inspection of stormwater management facilities owned or operated by the City.
- The stormwater management facility spreadsheet or database incorporated by reference and the location or webpage address where the spreadsheet or database can be reviewed.

MCM 5 is closely related to having a VSMP that is consistent with the requirements of Virginia Stormwater Management Act (§ 62.1-44.15:24 et. seq.) and VSMP Regulations (9VAC25-870).

### ***Measurable Goals***

The following measurable goals are included for MCM 5:

- The City's VSMP will be found consistent during any programmatic evaluation by DEQ.
- The City will review stormwater management plans for compliance with Chapter 9 Article 3 of the Winchester City Code.
- The City will use its legal authority to require that a land disturbing activity has an approved stormwater management plan prior to land disturbance.
- The City will inspect regulated land disturbing activities for implementation of a SWPPP.

- The City will inspect land disturbing activities for implementation of an approved stormwater management plan.
- The City will require Maintenance Agreements for stormwater management facilities approved as part of a stormwater management plan.
- The City will conduct annual inspections on stormwater management facilities that it operates.
- The City will conduct maintenance on its stormwater management facilities when identified as part of an annual inspection.
- Inspections will be conducted on private stormwater management facilities at a minimum of once every five (5) years.
- The City will use its legal authority to ensure that required maintenance is completed when identified as part of an inspection.

***BMPs Selected for Implementation***

The City has selected the following BMPs to meet the measurable goals for MCM 5. Selected BMPs are as follows:

**Table 10: BMPs Selected for Implementation – MCM 5**

<b>BMP</b>	<b>Names</b>	<b>Description</b>	<b>Reporting Items</b>
5.1	Legal Authority - SWM	The City will maintain legal authority necessary to implement a VSMP that is consistent with 9VAC25-870-10 et. seq. This legal authority is established at Chapter 9, Section III of the Code of Winchester	N/A
5.2	Private Stormwater Management Facility Inspections	The City will maintain a post development stormwater management facility inspection program in accordance with Section 9-67 of the City Code. Inspections on such facilities will be conducted at least once every five (5) years. Under required Maintenance Agreements executed by and between a private landowner (BMP 5.3), the City is provided with the right-of-access to the private property on which a stormwater	Number of inspections; Number of and type of enforcement actions taken; Number of SWM Facilities needing follow-up maintenance



		<p>BMP is located, confers responsibility for construction and maintenance to the private landowner or property owners' association, and ensures that the City can undertake steps to maintain a facility should an inspection identify any deficiencies or problems. Maintenance Agreements are recorded with title to the property, providing the City with an enforceable legal instrument should a private landowner neglect to maintain a stormwater management facility constructed on his or her property. Inspection records will be kept on file with the City Engineer's Division.</p>	
5.3	Maintenance Agreements	<p>The City will require executed Maintenance Agreements for stormwater management facilities in accordance to Chapter 9, Article 63. The agreement shall be recorded in the office of the Clerk of the Circuit Court of the City of Winchester. A copy of the City of Winchester Stormwater Facilities/BMP Maintenance Agreement is included in the Virginia Stormwater Management Program Permit Application.</p>	<p>Number of maintenance agreements (SWM Facilities)</p>
5.4	City-Owned Stormwater Management Facility Inspections	<p>The City Division of Engineering will inspect stormwater management facilities owned/operated by the City annually using procedures identified in the Public Stormwater Management Facility Inspection Standard Operating Procedures Manual, May 2019 edition. Copies of the inspections will be kept on file with the City Engineer's Division.</p>	<p>Number of inspections; Number of SWM Facilities needing follow-up maintenance</p>
5.5	City-Owned	The City Division of Public Works	Summary of

	Management Facility Maintenance	and Parks & Recreation will conduct maintenance on City-Owned Stormwater Management Facilities as necessary and in response to Division of Engineering inspections.	maintenance activities (SWM Facilities)
5.6	Tracking and Documentation	The City will track and document permanent stormwater management facilities in the City's BMP spreadsheet maintained by the City Engineering Division.	Submission of excel spreadsheet detailing new stormwater management facilities

To meet the measurable goals identified for MCM 5, the City will also utilize the following BMPs:

- BMP 4.2: Land Disturbing Activity Plan Review
- BMP 4.3: VPDES Construction Activity Permit Coordination
- BMP 4.4: Land Disturbing Activity Inspections

The Measurable Goal/BMP Relationship Matrix in Table 11 demonstrates which BMPs will be used to meet each measurable goal for MCM 5.

**Table 11: Measurable Goal/BMP Relationship Matrix – MCM 5**

<b>Measurable Goals</b>	<b>BMP 4.2</b>	<b>BMP 4.3</b>	<b>BMP 4.4</b>	<b>BMP 5.1</b>	<b>BMP 5.2</b>	<b>BMP 5.3</b>	<b>BMP 5.4</b>	<b>BMP 5.5</b>	<b>BMP 5.6</b>
The City's VSMP will be found consistent during any programmatic evaluation by DEQ.	X	X	X	X	X	X	X	X	X
The City will review stormwater management plans for compliance with Chapter 9 Article 3 of the Winchester City Code.	X			X			X	X	X
The City will use its legal authority to require that a land disturbing activity has an approved stormwater management plan prior to land disturbance.	X	X	X	X					X
The City will inspect regulated land disturbing activities for implementation of a SWPPP.			X						X
The City will inspect land disturbing activities for implementation of an approved stormwater management plan.			X				X	X	X
The City will require Maintenance Agreements for stormwater management facilities approved as part of a stormwater management plan.			X	X	X	X	X	X	X
The City will conduct annual inspections on stormwater management facilities that it operates.			X				X	X	X
The City will conduct maintenance on its stormwater management facilities when identified as part of an annual inspection.			X			X		X	X
Inspections will be conducted on private stormwater management facilities at a minimum of once every five (5) years.			X		X	X			X
The City will use its legal authority to ensure that required maintenance is completed when identified as part of an inspection.				X		X		X	X

## ***MS4 Annual Reporting***

The City must include the following as part of its MS4 Annual Report.

### ***General Permit Reporting Requirements***

The City will track, collect and submit to DEQ in its MS4 Annual Report the following items regarding MCM 5:

- The number of privately owned stormwater management facility inspections conducted
- The number of enforcement actions initiated by the City to ensure long-term maintenance of privately owned stormwater management facilities including the type of enforcement action.
- Total number of inspections conducted on stormwater management facilities owned or operated by the City.
- Total number of inspections conducted on stormwater management facilities owned or operated by the City.
- A description of the significant maintenance, repair, or retrofit activities performed on the stormwater management facilities owned or operated by the City to ensure it continues to perform as designed. This does not include routine activities such as grass mowing or trash collection.
- A confirmation statement that the City submitted stormwater management facility information through the Virginia Construction Stormwater General Permit database for those land disturbing activities for which the City was required to obtain coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities in accordance with Part I E 5 f or a statement that the City did not complete any projects requiring coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities.
- A confirmation statement that the City electronically reported BMPs using the DEQ BMP Warehouse in accordance with Part I E 5 g and the date on which the information was submitted.

### ***BMP Specific Reporting Requirements***

In addition to the General Permit reporting requirements, the MS4 Annual Report must include the specific BMP reporting items identified in Table 10.

## ***MS4 Program Plan MCM 5 Specific Update Requirements***

As of May 1, 2019, there are no mandated updates to MCM 5 identified in the MS4 General Permit scheduled for the duration of the permit cycle.

## **MCM 6. Pollution Prevention and Good Housekeeping for Facilities Owned or Operated by the Permittee within the MS4 Service Area**

### ***Summary of the Requirements***

Under the General Permit, the City is required to implement a Pollution Prevention and Good Housekeeping written procedures to reduce the amount of pollutants discharged in stormwater runoff from the high priority facilities owned or operated by the City. These written procedures will be utilized as part of the employee stormwater training program for appropriate City staff. In addition, MCM 6 requires the City to implement NMPs on certain properties.

MS4 Program plan shall include:

- Written procedures for the operations and maintenance activities as required by Part I.E.6.a
- A list of all high priority facilities owned or operated by the permittee required in accordance with Part I.E.6.c, and whether or not the facility has a high potential to discharge
- A list of land for which turf and landscape nutrient management plans are required in accordance with Part I.E.6.i and j, including the following information:
  - Total acreage on which nutrients are applied
  - Date of the most recently approved nutrient management plan for the property
  - Location in which the individual turf and landscape nutrient management plan is located.
- Summary of mechanisms the permittee uses to ensure contractors working on behalf of the permittees implement the necessary good housekeeping and pollution prevention procedures, and stormwater pollution plans as appropriate
- Written training plan as required in Part I.E.6.m.

### ***Measurable Goals***

The following measurable goals are included in the updated MS4 Program Plan for MCM 6:

- The City will implement, maintain, and update as necessary the written procedures/SOPs for those activities at facilities owned or operated by the City, which was updated on May 2019.
- The City will maintain coverage of the City Yards facility under its Municipal Separate Storm Sewer System (MS4) program.

- The City will continue to implement, maintain, and update as necessary SWPPPs that were created for VPDES General Permit and High Priority Facilities.
- The City will implement, maintain, and update as necessary NMPs on City properties identified in the NMP Facility Evaluation, which was created on June 2016.
- The City will implement, maintain, and update every two (2) years the City of Winchester Stormwater Training Plan for relevant employees.
- City employees will maintain the appropriate certifications required for plan review, inspection, and program administration of the City’s ESC Program.
- City employees will maintain the appropriate certifications required for plan review, inspection, and program administration of the City’s Stormwater Management Program.
- City employees and contractors will maintain the appropriate certifications required for pesticide application as required under the Pesticide Act.

***BMPs Selected for Implementation and the Reporting Items***

The City has selected the following BMPs to meet the measurable goals for MCM 6.

Selected BMPs are as follows:

**Table 12: BMPs Selected for Implementation MCM 6**

<b>BMP</b>	<b>Names</b>	<b>Description</b>	<b>Reporting Items</b>
6.1	Standard Operating Procedures	City will implement, maintain, and update as necessary standard operating procedures and pollution prevention methods for those activities at facilities owned or operated by the City	N/A
6.2	Stormwater Pollution Prevention Plans	City will develop, implement, maintain, and update as necessary SWPPPs for High-Priority Facilities.	N/A
6.3	Nutrient Management Plans	City will develop, implement, maintain, and update as necessary NMPs by a certified turf and landscape nutrient management planner in accordance with § 10.1-104.2 of the Code of Virginia. NMPs must be renewed every three years. Copies of the nutrient management plans will be	Any new or updated NMPs

		incorporated by reference into the MS4 Program Plan upon approval.	
6.4	Pollution Prevention Inspections	City will conduct quarterly pollution prevention inspection at the High Priority Facilities accordingly following the inspection guidelines in the SWPPP.	Date of Inspection
6.5	Staff Training	City will conduct staff training and follow guidelines in accordance with the City of Winchester Stormwater Training Plan, May 2019 edition.	List of Training Events (including dates, # attending, training objective)
6.6	Street Sweeping	The City will continue its street sweeping program and track amount of litter and debris removed.	# of lane miles swept
6.7	VPDES Industrial Stormwater Permit Compliance Coordination	City will maintain and update as necessary the Stormwater Pollution Prevention Plan as required under the Virginia General Permit for Discharge of Stormwater from Industrial Activities	Stormwater Permit with Coverage Letter & most updated SWPPP

The Measurable Goal/BMP Relationship Matrix in Table 13 demonstrates which BMPs will be used to meet each Measurable Goal for MCM 6.

**Table 13: Measurable Goal/BMP Relationship Matrix – MCM 6**

Measurable Goals	BMP 6.1	BMP 6.2	BMP 6.3	BMP 6.4	BMP 6.5	BMP 6.6	BMP 6.7
The City will implement, maintain, and update as necessary the written procedures/SOPs for those activities at facilities owned or operated by the City, which was created on June 2015.	X	X	X	X	X	X	X
The City will maintain coverage of the City Yards facility under its MS4 program.	X						X

Measurable Goals	BMP 6.1	BMP 6.2	BMP 6.3	BMP 6.4	BMP 6.5	BMP 6.6	BMP 6.7
The City will continue to implement, maintain, and update as necessary SWPPPs that were created for VPDES General Permit and High Priority Facilities.	X	X		X	X		
The City will implement, maintain, and update as necessary NMPs on City properties identified in the NMP Facility Evaluation, which was created on June 2016.	X		X		X		
The City will implement, maintain, and update every two (2) years the City of Winchester Stormwater Training Plan for relevant employees.	X				X		
City employees will maintain the appropriate certifications required for plan review, inspections, and program administration of the City's ESC Program.	X				X		
City employees will maintain the appropriate certifications required for plan, review, inspection, and program administration of the City's Stormwater Management Program.	X				X		
City employees and contractors will maintain the appropriate certifications required for pesticide application as required under the Pesticide Act.	X				X		

### **MS4 Annual Reporting**

The City must include the following as part of its MS4 Annual Report:

#### **General Permit Reporting Requirements**

- A summary of any operational procedures developed or modified for those activities at facilities owned or operated by the City during the reporting period.
- A summary of any new SWPPPs developed for the high-priority facilities that have a high potential for discharging pollutants that are not covered under a separate VPDES permit during the reporting period.
  - No later than June 30 of each year, the City shall annually review any high-priority facility owned or operated by the permittee for which a SWPPP has not been developed to determine if the facility has a high potential to discharge pollutants as described in Part I E 6 c. If the



facility is determined to be a high-priority facility with a high potential to discharge pollutants, the City shall develop a SWPPP meeting the requirements of Part I E 6 d no later than December 31 of that same year.

- A summary of any SWPPPs modified or the rationale of any high priority facilities delisted during the reporting period.
- A summary of any new turf and landscape nutrient management plans developed that includes:
  - Location and the total acreage of each land area
  - The date of the approved nutrient management plan
- A list of the training events conducted
  - The date of the training event
  - The number of employees who attended the training event
  - The objective of the training event

### ***BMP Specific Reporting Requirements***

In addition to the General Permit reporting requirements, the MS4 Annual Report must include the specific BMP reporting items identified in Table 11.

### ***MS4 Program Plan MCM 6 Specific Update Requirements***

#### ***Requirement # 1 (Due: November 1, 2019) – Identify High Priority Facilities with High Potential to Discharge Pollutants.***

The City must identify if there are any more City owned or operated High Priority Facilities. Also, the City must develop, implement, maintain, and update as necessary a SWPPP for each of the High Priority Facilities.

**Table 14: Sites Identified as Requiring NMPs**

<b>Address</b>	<b>Notes Regarding Use</b>	<b>Turf Acreage</b>	<b>Latitude</b>	<b>Longitude</b>
1001 E Cork St.	Jim Barnett Park	71.6	39.1727797	-78.1548890
623 North Pleasant Valley Rd.	Friendship Park	9.3	39.1899529	-78.1508964
900 Whittier Ave.	Whittier Park	5.9	39.1911247	-78.1779289
167 Bruce Dr.	Weaver Neighborhood Park	5.1	39.149049	-78.1757645
2024 Harvest Dr.	Park Place Public Park	4.0	39.1659935	-78.1887412
805 Crestview Terrace St.	West Ridge & Harvest Ridge Park	1.4	39.1585249	-78.1931146

## Special Conditions

As a result of approved TMDLs, the following General Permit Special Conditions are applicable to the City:

- Chesapeake Bay TMDL special condition.
- Local TMDL special condition.

Table 5 identifies those TMDLs in which the City has waste load allocations (WLAs).

**Table 15: TMDLs with Waste Loads Allocated to the City of Winchester**

TMDL	Approval Date	Pollutant of Concern	WLA
Opequon Watershed TMDLs for Benthic Impairments: Abrams Creek and Lower Opequon Creek, Frederick and Clarke Counties, Virginia	6/28/2005	Sediment	442.7 tons/year of sediment to Abrams Creek <sup>1</sup>
			269.2 tons/year of sediment to the Lower Opequon Creek <sup>1</sup>
Bacteria TMDLs for Abrams Creek and Upper and Lower Opequon Creek Located in Frederick and Clarke County, Virginia	12/20/2005	E. Coli	310x10 <sup>10</sup> cfu/year of E. coli to Abrams Creek
Chesapeake Bay TMDL for Nitrogen, Phosphorus and Sediment	12/29/2010 <sup>2</sup>	Sediment	Pollutant reduction calculations for sediment, phosphorus and nitrogen will be calculated with development of the Chesapeake Bay Action Plan
		Phosphorus	
		Nitrogen	

<sup>1</sup> WLA Aggregated with VDOT MS4

<sup>2</sup> Approved by EPA

Previously, in response to the Opequon Creek Watershed TMDL Implementation Plan, which was approved by the Virginia State Water Control Board on March 23, 2007, the City has incorporated the following pollutant reduction efforts into its operations:

- Reduced the threshold for regulated land disturbing activities from 10,000 ft<sup>2</sup> to 5,000 ft<sup>2</sup> under Chapter 9 Article 2
- Instituted stream buffer protection under Chapter 9 Article 4
- Prohibited feeding of waterfowl under Chapter 5 Article 3
- Continued its program to eliminate entry of sanitary sewage into the storm system

## ***MS4 Program Plan Special Conditions Specific Update Requirements***

### ***Requirement # 1 (Due: May 1, 2020) – Local TMDL***

- For TMDLs approved by the EPA prior to July 1, 2013, and in which an individual or aggregate waste load has been allocated to the City, the City shall update the previously approved local TMDL action plans to meet the conditions of Part II B 3, B 4, B 5, B 6, and B 7 as applicable, no later than 18 months after the permit effective date and continue implementation of the action plan.

### ***Requirement # 2 (Due: November 1, 2022) – Local TMDL***

- No later than 36 months after the effective date of this permit, the City shall submit to the department the anticipated end dates by which the City will meet each WLA for sediment, phosphorous, or nitrogen. The proposed end date may be developed in accordance with Part II B 2.

### ***Requirement # 3 (Due: November 1, 2019) – Chesapeake Bay TMDL***

- No later than 12 months after the permit effective date, the City shall submit an updated Chesapeake Bay TMDL action plan for the reductions required in Part II A 3, A 4, and A 5 that includes the following information on Part II A 11.

## Documents Incorporated by Reference

Documents identified in Table 6 are considered part of the MS4 Program Plan. These documents provide policy, procedure and guidance for implementation of certain BMPs and measurable goals.

**Table 16: Documents Incorporated into the MS4 Program Plan by Reference**

Title	Date	Location
City Code Chapter 9-Water Quality	N/A	<a href="https://library.municode.com/va/winchester/codes/code_of_ordinances?nodeId=CD_CH9WAPR">https://library.municode.com/va/winchester/codes/code_of_ordinances?nodeId=CD_CH9WAPR</a>
Public Services Standards Manual	10/2017	<a href="http://www.winchesterva.gov/sites/default/files/documents/engineering/2017-standards.pdf">http://www.winchesterva.gov/sites/default/files/documents/engineering/2017-standards.pdf</a>
VSMP Permit Application Package	07/2014	<a href="http://www.winchesterva.gov/sites/default/files/documents/engineering/vsmp_2014_-_fillable.pdf">http://www.winchesterva.gov/sites/default/files/documents/engineering/vsmp_2014_-_fillable.pdf</a>
Land Disturbance Application Package	07/2014	<a href="http://www.winchesterva.gov/sites/default/files/documents/engineering/ldp_application_2014_fillable.pdf">http://www.winchesterva.gov/sites/default/files/documents/engineering/ldp_application_2014_fillable.pdf</a>
Land Disturbance Package-Single Family Dwellings	07/2014	<a href="http://www.winchesterva.gov/sites/default/files/documents/engineering/ldp_application_-_sf_2014_-_fillable.pdf">http://www.winchesterva.gov/sites/default/files/documents/engineering/ldp_application_-_sf_2014_-_fillable.pdf</a>
Public Education Outreach Plan	05/2019	Appendix A
Illicit Discharge Detection and Elimination (IDDE) Standard Operating Procedures Manual	05/2019	Appendix B
Public Stormwater Management Facility Inspection Standard Operating Procedures Manual	05/2019	Appendix C
Municipal High Priority Facility Determination	05/2019	Appendix D
Nutrient Management Plan Facility Determination	05/2019	Appendix E
City of Winchester Stormwater Training Plan	05/2019	Appendix F

## Additional MS4 Program Reference Materials

In addition to the documents incorporated into the MS4 Program Plan in Table 17, the City of Winchester has additional reference materials available for use in implementation of the MS4 Program as necessary and are not considered part of the MS4 Program Plan itself.

**Table 17: Additional MS4 Program Reference Materials**

Available Materials	Expected Usage for MCMs:						Location
	1	2	3	4	5	6	
Brochure/Flyer "Adopting a Stream in Winchester is Easy"	X	X					<a href="http://www.winchesterva.gov/sites/default/files/documents/engineering/Six%20Steps%20Flyer.pdf">http://www.winchesterva.gov/sites/default/files/documents/engineering/Six%20Steps%20Flyer.pdf</a>
Brochure/Flyer "Do Not Feed the Geese in the Park"	X	X					<a href="http://www.winchesterva.gov/sites/default/files/documents/engineering/geese20brochure201-12-09.pdf">http://www.winchesterva.gov/sites/default/files/documents/engineering/geese20brochure201-12-09.pdf</a>
Presentation "What is a Watershed?" by EPA/The Weather Channel	X						Direct link from Winchester Stormwater page: <a href="https://www.youtube.com/watch?v=PazndNOcXPQ">https://www.youtube.com/watch?v=PazndNOcXPQ</a>
Presentation "How to Make Your Own Rain Barrel"	X	X					Direct link from Winchester Stormwater page: <a href="http://www.winchesterva.gov/sites/default/files/documents/engineering/rain-barrel-workshop-presentation.pdf">http://www.winchesterva.gov/sites/default/files/documents/engineering/rain-barrel-workshop-presentation.pdf</a>
Brochure/Flyer "It's Your Doodie" (Pet Waste)	X	X					<a href="http://www.winchesterva.gov/sites/default/files/documents/engineering/pet-waste-brochure.pdf">http://www.winchesterva.gov/sites/default/files/documents/engineering/pet-waste-brochure.pdf</a>
City Stormwater Webpage	X	X	X	X	X		<a href="http://www.winchesterva.gov/engineering/stormwater">www.winchesterva.gov/engineering/stormwater</a>
City 311 System		X	X	X	X		<a href="https://www.winchesterva.gov/knowledgebase">https://www.winchesterva.gov/knowledgebase</a>
City Calendar Webpage	X	X	X				<a href="http://www.winchesterva.gov/calendar">http://www.winchesterva.gov/calendar</a>
Brochure/Flyer "Stormwater Complaint Hotline"	X	X	X	X			<a href="http://www.winchesterva.gov/sites/default/files/documents/engineering/Stormwater%20Complaint%20Hotline%20v2.pdf">http://www.winchesterva.gov/sites/default/files/documents/engineering/Stormwater%20Complaint%20Hotline%20v2.pdf</a>
Annual Report		X					<a href="http://www.winchesterva.gov/engineering/stormwater">www.winchesterva.gov/engineering/stormwater</a>
Brochure/Flyer "Yard Waste"		X	X				<a href="http://www.winchesterva.gov/sites/default/files/documents/public-works/Yard%20Waste%20Notice%20-%20new.pdf">http://www.winchesterva.gov/sites/default/files/documents/public-works/Yard%20Waste%20Notice%20-%20new.pdf</a>
Brochure/Flyer "Adopt-a-Stream"		X					<a href="http://www.winchesterva.gov/engineering/adopt-a-stream">http://www.winchesterva.gov/engineering/adopt-a-stream</a>
"Unwanted Items" Webpage		X	X				<a href="http://www.winchesterva.gov/public-works/unwanted-items">http://www.winchesterva.gov/public-works/unwanted-items</a>
"Refuse and Recycling" Webpage		X	X				<a href="http://www.winchesterva.gov/public-works/refuse">http://www.winchesterva.gov/public-works/refuse</a>
Virginia Erosion and Sediment Control Handbook				X			<a href="http://www.deq.virginia.gov/Programs/Water/StormwaterManagement/Publications/ESCHandbook.aspx">http://www.deq.virginia.gov/Programs/Water/StormwaterManagement/Publications/ESCHandbook.aspx</a>
Virginia Erosion and Sediment Control Law (§62.1-44.15:51 et. seq.)				X			<a href="https://law.lis.virginia.gov/vacode/title62.1%20chapter3.1/section62.1-44.15:51/">https://law.lis.virginia.gov/vacode/title62.1%20chapter3.1/section62.1-44.15:51/</a>

Available Materials	Expected Usage for MCMs:						Location
	1	2	3	4	5	6	
Virginia Stormwater Management Handbook (2013-Draft)					X		<a href="https://www.deq.virginia.gov/Programs/Water/StormwaterManagement/Publications.aspx">https://www.deq.virginia.gov/Programs/Water/StormwaterManagement/Publications.aspx</a>
City BMP Spreadsheet					X		City Engineering Division Office
BMP Inspection Reports					X		City Engineering Division Office
City Yards SWPPP						X	Physically located at Winchester City Yards/301 E Cork Street/Winchester, VA 22601