

BMP-Admin

The City of Winchester will update and provide additional schedules to implement its MS4 program in order to meet the requirements of the VSMP General Permit for Stormwater Discharges from Small MS4s. The City of Winchester understands that it may, at any time, choose to apply for and obtain coverage under an individual VSMP permit instead of meeting the conditions of the General Permit.

The City of Winchester defines its MS4 Program Plan as its Registration Statement for Coverage under the General Permit for Discharges from Small MS4s dated December 6, 2007, and all documents, policies, and procedures specified directly and those documents, policies, procedures necessary to implement all specified programs listed in the registration statement, as amended by annual updates.

Responsible Party: The MS4 Program is administered through the Public Services Department. The Public Services Director is responsible for developing the updated MS4 Plan and providing the appropriate certification to any documents. Additional responsible parties for whom the authority to oversee individual BMPs associated with the Minimum Control Measures have been delegated and are indicated with each individual BMP in this document.

Measurable Goals: The updated copy of this MS4 Program Plan must be completed and submitted to DCR by January 10, 2010, in compliance with the schedule included in the reissued General Permit, and specified in the letter from DCR to the City, dated July 15, 2008.

Items Needed for the Annual Report: An annual report must be submitted for each permit year in compliance with the time frame included in the reissued General Permit.

To Be Completed as Part of the MS4 Program Plan Update Required By the New Permit:

1. Update the permit requirements for the Six Minimum Control Measures.
2. Are any additional BMPs required to meet the new permit requirements?
3. Provide a description of the BMP, responsible party, and schedule including interim goals to implement the additional BMPs that is consistent with the new permit.
4. For each existing BMP included in the MS4 Program Plan, review and complete the following:
 - a. Does this BMP comply with the new General Permit or are modifications required?
 - b. If no modifications are required, then BMP remains the same.
 - c. If modifications are required, what modifications are required?
 - d. What is my proposed schedule for implementation of the modifications?
 - e. Include the proposed schedule in the Schedule and Evaluation Section.
 - f. Does the BMP address the pollutant identified in a TMDL wasteload allocation?
 - g. Which TMDL wasteload allocation?
 - h. How does the BMP address the pollutant identified in a TMDL wasteload allocation?
 - i. How can the BMP be modified to be more effective in addressing the pollutant identified in the TMDL wasteload allocation?
 - j. When applicable, include a proposed schedule for BMP modification to more effectively address the TMDL wasteload allocation.

Minimum Control Measure (1): public education and outreach on stormwater impacts

Implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff.

The operator shall identify, schedule, implement, evaluate and modify, as necessary, BMPs to meet the following public education and outreach measurable goals:

- a. Increased individual and household knowledge about the steps that they can take to reduce stormwater pollution, placing priority on reducing impacts to impaired waters and other local water pollution concerns;*
- b. Increased public employee, business, and general public knowledge of hazards associated with illegal discharges and improper disposal of waste, including pertinent legal implications;*
- c. Increased individual and group involvement in local water quality improvement initiatives including the promotion of local restoration and clean up projects, programs, groups, meetings and other opportunities for public involvement;*
- d. Diverse strategies to target audiences specific to the area serviced by the regulated small MS4;*
- e. Improved outreach program to address viewpoints and concerns of target audiences, with a recommended focus on minorities, disadvantaged audiences and minors; and*
- f. Targeted strategies towards local groups of commercial, industrial, and institutional entities likely to have significant stormwater impacts.*

BMP 1.1 – Broadcast programs focused on stormwater

The City will initiate web access to programs focused on stormwater in the early part of 2010. The City will incorporate the release of the public announcement of the “After the Storm” onto the City’s stormwater website (www.winchesterva.gov/engineering/stormwater). The program provides information to the general public on stormwater issues and more specifically actions they can take to reduce stormwater pollution. The change from broadcasting this program on TV to the website is required because the public access channel was eliminated by City Council. The website provides free information to the City’s individuals, households, public employees, and businesses.

Schedule and Evaluation: Winchester plans to have the website link available at all times. This is an increase in accessibility from the TV broadcast of “After the Storm” show which was limited to 4 times a year. The City will evaluate the effectiveness of the broadcast by asking citizens that call the stormwater complaint hotline if they have seen the video or if they are aware of the website link, and also by tracking the number of visitors to the website. If citizens who call the stormwater complaint hotline are not familiar with the website link, information regarding the link to the website will be provided to them.

Responsible Party: City Engineer

Necessary Documents: “After the Storm” EPA/Weather Channel Show

Measurable Goals: The City will add the program to the stormwater website and it will be available all the time.

Items to be Reported in the Annual Report: The annual report will include information on the number of times that visitors went to the “After the Storm” website.

Modifications per Required BMP-Admin Update:

- a. Does this BMP comply with the new General Permit or are modifications required? **Yes. No modifications required for compliance.***
- b. If no modifications are required, then BMP remains the same. **N/A***

Minimum Control Measure (1): public education and outreach on stormwater impacts

- c. *If modifications are required, what modifications are required?* **N/A**
- d. *What is my proposed schedule for implementation of the modifications?* **N/A**
- e. *Include the proposed schedule in the Schedule and Evaluation Section.* **N/A**
- f. *Does the BMP address the pollutant identified in a TMDL wasteload allocation?*
No
- g. *Which TMDL wasteload allocation?* **N/A**
- h. *How does the BMP address the pollutant identified in a TMDL wasteload allocation?* **N/A**
- i. *How can the BMP be modified to be more effective in addressing the pollutant identified in the TMDL wasteload allocation?* **N/A**
- j. *When applicable, include a proposed schedule for BMP modification to more effectively address the TMDL wasteload allocation.* **N/A**

BMP 1.2 Continue disseminating information to the general public

The City participates in several annual activities aimed at disseminating information to the general public. These include the Wellness Festival (located at the Apple Blossom Mall and occurring in February) and Earth Day Activities (located at the Jim Barnett Park and occurring in April). Participation in these activities allows the City to focus the water quality improvement initiatives toward specific target audiences that include those served by the MS4, allows for the interactive exchange of viewpoints and concerns and those who are considered likely to affect pollution reduction in the MS4.

Schedule and Evaluation: The City will participate in the Wellness Festival and the Earth Day Activities in February and April of each year of the permit cycle. The effectiveness of this BMP will be evaluated based on the estimated number of brochures distributed at these events.

Responsible Party: City Engineer

Necessary Documents: Informational brochures to be distributed at the events will address the City's Stormwater complaint hotline and the City's Adopt-A-Stream program as well as EPA's general customizable brochure on stormwater pollution (available from EPA's website).

Measurable Goals: Effectiveness of this BMP will be measured based on the estimated number of brochures distributed at these events.

Items to be Reported in the Annual Report: The annual report will include information on the estimated number of brochures distributed at the public events.

Modifications per Required BMP-Admin Update:

- a. *Does this BMP comply with the new General Permit or are modifications required?* **Yes. No modifications required for compliance.**
- b. *If no modifications are required, then BMP remains the same.* **N/A**
- c. *If modifications are required, what modifications are required?* **N/A**
- d. *What is my proposed schedule for implementation of the modifications?* **N/A**
- e. *Include the proposed schedule in the Schedule and Evaluation Section.* **N/A**
- f. *Does the BMP address the pollutant identified in a TMDL wasteload allocation?*
No
- g. *Which TMDL wasteload allocation?* **N/A**

Minimum Control Measure (1): public education and outreach on stormwater impacts

- h. How does the BMP address the pollutant identified in a TMDL wasteload allocation? **N/A***
- i. How can the BMP be modified to be more effective in addressing the pollutant identified in the TMDL wasteload allocation? **N/A***
- j. When applicable, include a proposed schedule for BMP modification to more effectively address the TMDL wasteload allocation. **N/A***

BMP 1.3 Continue administering stormwater complaint hotline

The City has established a stormwater complaint hotline. A brochure for the hotline is posted on the City's stormwater website at <http://www.winchesterva.gov/engineering/stormwater.php>. In addition, utility bill inserts providing information on the stormwater hotline were included in the December 2007 to January 2008 utility bills. This BMP provides communication to the vast majority of individuals, businesses and groups (including minority and disadvantaged audiences), and provides a forum for concerns and fosters community involvement.

Schedule and Evaluation: The City's schedule for this BMP is an ongoing process. The City will evaluate the effectiveness of this BMP based on the number of calls received to report problems. In addition, the City will evaluate the need to distribute another utility bill insert based on the response received to the initial distribution as well as response well beyond the initial distribution.

Responsible Party: City Engineer

Necessary Documents: Flyer on stormwater complaint hotline and utility bill inserts advertising the stormwater complaint hotline

Measurable Goals: The City will evaluate the effectiveness of this BMP based on the number of calls received to report problems as well as the number of problems resolved, unresolved based on constraints, etc.

Items to be Reported in the Annual Report: The City's annual report will include information on the number of calls received, the number of unresolved complaints, etc. on an annual basis and include in the annual report.

Modifications per Required BMP-Admin Update:

- a. Does this BMP comply with the new General Permit or are modifications required? **Yes. No modifications required for compliance.***
- b. If no modifications are required, then BMP remains the same. **N/A***
- c. If modifications are required, what modifications are required? **N/A***
- d. What is my proposed schedule for implementation of the modifications? **N/A***
- e. Include the proposed schedule in the Schedule and Evaluation Section. **N/A***
- f. Does the BMP address the pollutant identified in a TMDL wasteload allocation? **Yes***
- g. Which TMDL wasteload allocation? **"Bacteria TMDL for Abrams Creek and Upper and Lower Opequon Creek Located in Frederick and Clarke County, Virginia"***
- h. How does the BMP address the pollutant identified in a TMDL wasteload allocation? **It provides a mechanism for observed sources of bacterial contamination to be reported and addressed by the MS4 staff.***

Minimum Control Measure (1): public education and outreach on stormwater impacts

- i. *How can the BMP be modified to be more effective in addressing the pollutant identified in the TMDL wasteload allocation? N/A*
- j. *When applicable, include a proposed schedule for BMP modification to more effectively address the TMDL wasteload allocation. N/A*

BMP 1.4 Update and maintain stormwater information posted on City's website

The City has added information to the City's website at <http://www.winchesterva.gov/engineering/stormwater.php> on the City's stormwater complaint hotline as well as the City's Adopt-A-Stream program (including a flyer to request participation, the 6-Step Process to adopt a segment of Stream in Winchester and pictures from a recent event). In addition the City's website will include general information defining a watershed and an MS4 as well as explaining why stormwater runoff is important to the community.

Schedule and Evaluation. The City will continue posting updated information on the City's stormwater complaint hotline and Adopt-A-Stream Program, as needed. The City will evaluate the effectiveness of this BMP based on the response to the posting (including calls to the hotline number and participation in the Adopt-A-Stream program) and will track the number of "hits" to the stormwater website per year.

Responsible Party: City Engineer

Necessary Documents: Flyer on stormwater complaint hotline and flyers on Adopt-A-Stream Program (including invitation to participate and the 6-Step Process for adopting a segment of stream in Winchester)

Measurable Goals: The City will evaluate the effectiveness of this BMP based on the response to the posting (including calls to the hotline number and participation in the Adopt-A-Stream program) and will track the number of "hits" to the stormwater website per year.

Items to be Reported in the Annual Report: The City's annual report will include information on the number of calls received on the stormwater complaint hotline (including calls to the hotline number and participation in the Adopt-A-Stream program) and the number of "hits" to the stormwater website per year.

Modifications per Required BMP-Admin Update:

- a. *Does this BMP comply with the new General Permit or are modifications required? Yes. No modifications required for compliance.*
- b. *If no modifications are required, then BMP remains the same. N/A*
- c. *If modifications are required, what modifications are required? N/A*
- d. *What is my proposed schedule for implementation of the modifications? N/A*
- e. *Include the proposed schedule in the Schedule and Evaluation Section. N/A*
- f. *Does the BMP address the pollutant identified in a TMDL wasteload allocation? Yes*
- g. *Which TMDL wasteload allocation? "Bacteria TMDL for Abrams Creek and Upper and Lower Opequon Creek Located in Frederick and Clarke County, Virginia"*
- h. *How does the BMP address the pollutant identified in a TMDL wasteload allocation? It provides a mechanism for observed sources of bacterial contamination to be reported and addressed by the MS4 staff.*

Minimum Control Measure (1): public education and outreach on stormwater impacts

- i. *How can the BMP be modified to be more effective in addressing the pollutant identified in the TMDL wasteload allocation? N/A*
- j. *When applicable, include a proposed schedule for BMP modification to more effectively address the TMDL wasteload allocation. N/A*

BMP 1.5 Initiate formal program for presentations at elementary and high schools

Although the City has previously visited schools to present information on preventing stormwater pollution, the City would like to create a more formalized program to conduct school presentations. This program will be summarized in a letter (including a description of the type of information to be presented, the objective of the presentation, the length of presentation, the format of presentation – whether PowerPoint or field work or model such as Enviroscape, etc.). The City will then distribute the letter to target schools requesting that the City Engineer be invited to the school to make a presentation.

Schedule and Evaluation: The City will start this program within the first two years of the current permit cycle. The City will evaluate the effectiveness of the program based on the response to the letters distributed to target schools.

Responsible Party: City Engineer

Necessary Documents: Letter describing school program for stormwater pollution prevention education

Measurable Goals: The City will evaluate the effectiveness of the program based on the response to the letters distributed to target schools and the number of schools that elect to participate in the program by requesting the City Engineer to provide a presentation.

Items to be Reported in the Annual Report: The annual report will include information on the number of schools that elect to participate in the program, including the number of presentations provided each year and an approximate number of students who witnessed the presentation.

Modifications per Required BMP-Admin Update:

- a. *Does this BMP comply with the new General Permit or are modifications required? **Yes. No modifications required for compliance.***
- b. *If no modifications are required, then BMP remains the same. N/A*
- c. *If modifications are required, what modifications are required? N/A*
- d. *What is my proposed schedule for implementation of the modifications? N/A*
- e. *Include the proposed schedule in the Schedule and Evaluation Section. N/A*
- f. *Does the BMP address the pollutant identified in a TMDL wasteload allocation? **Yes***
- g. *Which TMDL wasteload allocation? **All existing and future TMDL wasteloads.***
- h. *How does the BMP address the pollutant identified in a TMDL wasteload allocation? **By reaching out to students while they are young and impressionable, the MS4 can develop a consciousness about the issues surrounding stormwater runoff pollution and water quality.***
- i. *How can the BMP be modified to be more effective in addressing the pollutant identified in the TMDL wasteload allocation? N/A*
- j. *When applicable, include a proposed schedule for BMP modification to more effectively address the TMDL wasteload allocation. N/A*

Minimum Control Measure (2): public involvement/participation

The operator shall identify, schedule, implement, evaluate and modify, as necessary, BMPs to meet the following public involvement/participation goals:

- a. Promote the availability of the operator's MS4 Program Plan for public review and comment. Provide access to or copies of the MS4 Program Plan upon request of interested parties in compliance with all applicable freedom of information regulations;
- b. Provide access to or copies of the annual report upon request of interested parties in compliance with all applicable freedom of information regulations; and
- c. Participate, through promotion, sponsorship, or other involvement, in local activities aimed at increasing public participation to reduce stormwater pollutant loads and improve water quality.

BMP 2.1 Continue encouraging participation in Adopt-A-Stream Program

The City has formalized an Adopt-A-Stream Program. A flyer has been distributed inviting participation and a second flyer was developed outlining the 6-Step Process for adopting a segment of stream in Winchester (including links to DCRs website). The City will continue encouraging participation in the program so that more streams are adopted in Winchester, and the participants will develop an enhanced appreciation for the need to reduce stormwater pollution and improve water quality.

Schedule and Evaluation: The City has posted information about the program on the City's website and also distributes details at public meetings. If participation does not increase over the years (based on the number of streams adopted each year of the permit cycle), the City will evaluate other means for advertising the program and inviting participation.

Responsible Party: City Engineer

Necessary Documents: Flyers on Adopt-A-Stream Program (including invitation to participate and the 6-Step Process for adopting a segment of stream in Winchester)

Measurable Goals: The City's goal for this BMP involves the adoption of at least 5 more stream segments in the five year permit cycle (to provide a total of 7 stream segments adopted).

Items to be Reported in the Annual Report: Information to be reported in the City's Annual report includes information on the streams adopted, the organizations participating in the program, the dates of cleanup events and a narrative description of the litter and debris removed from the stream and stream banks (either the number of bags collected and/or weight of material collected).

Modifications per Required BMP-Admin Update:

- a. Does this BMP comply with the new General Permit or are modifications required? **Yes. No modifications required for compliance.**
- b. If no modifications are required, then BMP remains the same. **N/A**
- c. If modifications are required, what modifications are required? **N/A**
- d. What is my proposed schedule for implementation of the modifications? **N/A**
- e. Include the proposed schedule in the Schedule and Evaluation Section. **N/A**
- f. Does the BMP address the pollutant identified in a TMDL wasteload allocation? **Yes**
- g. Which TMDL wasteload allocation? **All existing and future TMDL wasteloads.**
- h. How does the BMP address the pollutant identified in a TMDL wasteload allocation? **It provides an opportunity to educate and engage the public in understanding the issues that exist with watershed pollution. Through this**

Minimum Control Measure (2): public involvement/participation

engagement, the MS4 is developing an educated population who will be less likely to contribute to sediment and bacterial pollution and more likely to report incidents that are observed.

- i. How can the BMP be modified to be more effective in addressing the pollutant identified in the TMDL wasteload allocation? **N/A**
- j. When applicable, include a proposed schedule for BMP modification to more effectively address the TMDL wasteload allocation. **N/A**

BMP 2.2 Post the MS4 Permit and Subsequent Revisions to the City's Website

The City has developed a website with significant information regarding issues related to the MS4 General Permit. The City will post the permit and subsequent revisions to the program plan in a conspicuous location in the stormwater area of the City's website at <http://www.winchesterva.gov/engineering/stormwater.php> so that it may be reviewed and commented on by all interested parties. This posting complies with all applicable freedom of information regulations for both the MS4 Program Plan and the annual reports.

Schedule and Evaluation: The City will accomplish this BMP during the second year of the current permit cycle and will maintain this for all subsequent years.

Responsible Party: City Engineer

Necessary Documents: Current MS4 Program Plan and all related documents.

Measurable Goals: The City will evaluate the effectiveness of this BMP based on its being accomplished and updated for the Annual Reports from years 2, 3, 4 and 5.

Items to be Reported in the Annual Report: The Annual report shall report the date that new information is posted in each year of the permit cycle.

Modifications per Required BMP-Admin Update:

- a. Does this BMP comply with the new General Permit or are modifications required? **Yes. No modifications required for compliance.**
- b. If no modifications are required, then BMP remains the same. **N/A**
- c. If modifications are required, what modifications are required? **N/A**
- d. What is my proposed schedule for implementation of the modifications? **N/A**
- e. Include the proposed schedule in the Schedule and Evaluation Section. **N/A**
- f. Does the BMP address the pollutant identified in a TMDL wasteload allocation?
Yes
- g. Which TMDL wasteload allocation? **All existing and future TMDL wasteloads.**
- h. How does the BMP address the pollutant identified in a TMDL wasteload allocation? **By making the public aware of existing (and future) impairments within the MS4s jurisdiction.**
- i. How can the BMP be modified to be more effective in addressing the pollutant identified in the TMDL wasteload allocation? **N/A**
- j. When applicable, include a proposed schedule for BMP modification to more effectively address the TMDL wasteload allocation. **N/A**

Minimum Control Measure (3): illicit discharge detection and elimination

The MS4 Program shall:

- a. Develop, implement and enforce a program to detect and eliminate illicit discharges, as defined at 4 VAC50-60-1200, into the small MS4.
- b. Develop, if not already completed, a storm sewer system map, showing the location of all known outfalls of the regulated small MS4 including those physically interconnected to a regulated MS4, the associated HUCs, and the names and locations of all impaired surface waters that receive discharges from those outfalls. The operator shall also estimate the acreage within the regulated small MS4 discharging to each HUC and impaired water;
- c. To the extent allowable under state, tribal or local law or other regulatory mechanism, effectively prohibit, through ordinance, or other regulatory mechanism, non-storm water discharges into the storm sewer system and implement appropriate enforcement procedures and actions;
The following categories of nonstormwater discharges or flows (i.e. illicit discharges) must be addressed only if they are identified by the operator, the State Water Control Board, or by the board as significant contributors of pollutants to the regulated small MS4: water line flushing, landscape irrigation, diverted stream flows, rising ground waters, uncontaminated ground water infiltrations, uncontaminated pumped ground water, discharges from potable water sources, foundations drains, air conditioning condensation, irrigation water, springs, water from crawl space pumps, footing drains, lawn watering, individual residential car washing, flows from riparian habitats and wetlands, dechlorinated swimming pool discharges, street wash water, discharges or flows from fire fighting activities, and flows that have been identified in writing by the Department of Environmental Quality as de minimus discharges that are not significant sources of pollutants to state waters and not requiring and VPDES permit;
- d. Develop and implement procedures to detect and address non-stormwater discharges, including illegal dumping, to the regulated small MS4;
- e. Prevent or minimize to the maximum extent practicable, the discharge of hazardous substances or oil in the stormwater discharge(s) from the regulated small MS4. In addition, the MS4 Program must be reviewed to identify measures to prevent the recurrence of such releases and to respond to such releases, and the program must be modified where appropriate. This permit does not relieve the operator of the responsible part(ies) of any reporting requirements of 40 CFR Part 110 (2001), 40 CFR Part 117 (2001) and 40 CFR Part 302 (2001) or §62.1-44.34:19 of the Code of Virginia;
- f. Track the number of illicit discharges identified, provide narrative on how they were eliminated, and submit the information in accordance with the evaluation and assessment requirements of this permit; and
- g. Notify, in writing, any downstream regulated MS4 to which the small regulated MS4 is physically interconnected of the small regulated MS4s connection to that system.

BMP 3.1 Continue hazardous spill response program and household hazardous waste collection

The City is continuing to coordinate with Frederick County on a joint hazardous spill response program and a household hazardous waste collection program. Household hazardous waste is collected at the Regional Landfill, with two household hazardous waste collection days each month. The days are publicized in the local newspapers, radio and cable TV. The City plans to continue these programs through the current permit cycle.

Schedule and Evaluation: The City plans to continue this program with the two collection periods per month. The City will evaluate the need for increasing the number of days that the collections are needed based on the participation in the program.

Responsible Party: City Refuse and Recycling Coordinator

Necessary Documents: Local newspaper advertisement of household hazardous waste collection

Measurable Goals: The City will measure the effectiveness of this BMP based on the participation in the program and amount of waste collected during these events.

Items to be Reported in the Annual Report: The annual report will include information on the dates of the collection days as well as a narrative description on the type and general amount of materials collected (the number cans of discarded paint, the number and type of batteries collected, etc.)

Modifications per Required BMP-Admin Update:

- a. *Does this BMP comply with the new General Permit or are modifications required? **Yes. No modifications required for compliance.***
- b. *If no modifications are required, then BMP remains the same. **N/A***
- c. *If modifications are required, what modifications are required? **N/A***
- d. *What is my proposed schedule for implementation of the modifications? **N/A***
- e. *Include the proposed schedule in the Schedule and Evaluation Section. **N/A***
- f. *Does the BMP address the pollutant identified in a TMDL wasteload allocation? **No***
- g. *Which TMDL wasteload allocation? **N/A***
- h. *How does the BMP address the pollutant identified in a TMDL wasteload allocation? **N/A***
- i. *How can the BMP be modified to be more effective in addressing the pollutant identified in the TMDL wasteload allocation? **N/A***
- j. *When applicable, include a proposed schedule for BMP modification to more effectively address the TMDL wasteload allocation. **N/A***

BMP 3.2 Implement inspections of storm sewers within the City's five subwatersheds

In the previous permit cycle, the City completed a prioritization of subwatersheds based on the methodology presented in the Center for Watershed Protection (CWP) and EPA document on Illicit Discharge Detection and Elimination. The prioritization was based on a map of the City's subwatersheds, including locations of outfalls and impaired waters along with other available data. The City plans to implement inspections of the major outfalls within the City's subwatersheds.

Schedule and Evaluation: Based on the prioritization developed in the previous permit cycle, the City plans to conduct dry weather inspections of the major outfalls contained in these subwatersheds based on the following schedule:

Year 1 - Abrams Creek
Year 2 - Town Run
Year 3 - Buffalo Lick Run
Year 4 - Redbud Run
Year 5 - Hoge Run

Responsible Party: City Engineer

Necessary Documents: Outfall Reconnaissance Inventory (ORI) Form from CWP/EPA IDDE Manual

Measurable Goals: The City plans to inspect the major outfalls in one subwatershed per year, completing all five subwatersheds within the five year permit cycle in accordance with the schedule outlined above.

Items to be Reported in the Annual Report: The City's annual report will present the findings of the inspections for each year in the applicable annual reports, including information on any illicit connections identified as well as follow-up actions completed or planned.

Modifications per Required BMP-Admin Update:

- a. *Does this BMP comply with the new General Permit or are modifications required? **Yes. No modifications required for compliance.***
- b. *If no modifications are required, then BMP remains the same. **N/A***
- c. *If modifications are required, what modifications are required? **N/A***
- d. *What is my proposed schedule for implementation of the modifications? **N/A***
- e. *Include the proposed schedule in the Schedule and Evaluation Section. **N/A***
- f. *Does the BMP address the pollutant identified in a TMDL wasteload allocation? **No***
- g. *Which TMDL wasteload allocation? **N/A***
- h. *How does the BMP address the pollutant identified in a TMDL wasteload allocation? **N/A***
- i. *How can the BMP be modified to be more effective in addressing the pollutant identified in the TMDL wasteload allocation? **N/A***
- j. *When applicable, include a proposed schedule for BMP modification to more effectively address the TMDL wasteload allocation. **N/A***

BMP 3.3 Continue enforcement of illicit connections, as needed, according to the City's Water Protection Ordinance

The City has an established Water Protection Ordinance that provides for the prohibition of illicit connections and includes enforcement mechanisms. Advertisement of the City's stormwater complaint hotline (described previously) would be expected to provide the City with information on the existence of illicit connections.

Schedule and Evaluation. The City will continue the enforcement of illicit connections as needed and will evaluate the effectiveness of the ordinance enforcement based on the City's experiences with enforcing the illicit connection portion of the ordinance.

Responsible Party: City Engineer

Necessary Documents: The City's Water Protection Ordinance and flyer on the City's Stormwater Complaint Hotline

Measurable Goals: The City will track the number of calls into the stormwater complaint hotline (and/or emergency number) that address illicit connections as well as information on the number of illicit connections investigated and follow-up actions completed or planned.

Items to be Reported in the Annual Report: The City's annual report will report on the number of calls into the stormwater complaint hotline (and/or emergency number) that address illicit connections as well as information on the number of illicit connections investigated and follow-up actions completed or planned.

Modifications per Required BMP-Admin Update:

- a. *Does this BMP comply with the new General Permit or are modifications required? **Yes. No modifications required for compliance.***
- b. *If no modifications are required, then BMP remains the same. **N/A***
- c. *If modifications are required, what modifications are required? **N/A***
- d. *What is my proposed schedule for implementation of the modifications? **N/A***
- e. *Include the proposed schedule in the Schedule and Evaluation Section. **N/A***
- f. *Does the BMP address the pollutant identified in a TMDL wasteload allocation? **No***
- g. *Which TMDL wasteload allocation? **N/A***
- h. *How does the BMP address the pollutant identified in a TMDL wasteload allocation? **N/A***
- i. *How can the BMP be modified to be more effective in addressing the pollutant identified in the TMDL wasteload allocation? **N/A***
- j. *When applicable, include a proposed schedule for BMP modification to more effectively address the TMDL wasteload allocation. **N/A***

BMP 3.4 Continue administering stormwater complaint hotline to identify illicit connections

As previously mentioned in other BMP measures, the City has an established stormwater complaint hotline. The flyer advertising the hotline also includes an emergency number to contact to report on illegal dumping of materials. The flyer is posted on the website and a utility bill insert was developed and planned for release with the water/wastewater utility bills in the December 2007 to January 2008 timeframe.

Schedule and Evaluation: The City will implement this BMP on an ongoing basis and will evaluate the need to make any revisions to the format of the hotline based on the response.

Responsible Party: City Engineer

Necessary Documents: Flyer and utility bill insert advertising stormwater complaint hotline

Measurable Goals: The City will track the response to the stormwater complaint hotline, including information on the number of calls received, number of illicit connections identified and follow-up actions.

Items to be Reported in the Annual Report: The City's annual report will include information on the response to the stormwater complaint hotline, including information on the number of calls received, number of illicit connections identified and follow-up actions.

Modifications per Required BMP-Admin Update:

- a. *Does this BMP comply with the new General Permit or are modifications required? **Yes. No modifications required for compliance.***
- b. *If no modifications are required, then BMP remains the same. **N/A***
- c. *If modifications are required, what modifications are required? **N/A***
- d. *What is my proposed schedule for implementation of the modifications? **N/A***
- e. *Include the proposed schedule in the Schedule and Evaluation Section. **N/A***
- f. *Does the BMP address the pollutant identified in a TMDL wasteload allocation? **Yes***
- g. *Which TMDL wasteload allocation? **"Bacteria TMDL for Abrams Creek and Upper and Lower Opequon Creek Located in Frederick and Clarke County, Virginia" (VT BSE, 2003)***
- h. *How does the BMP address the pollutant identified in a TMDL wasteload allocation? **By providing a mechanism for the public to report observed odor or visually identified incidences of potential illicit connections, the City can address potential sources of raw sewage that is entering the receiving waters.***
- i. *How can the BMP be modified to be more effective in addressing the pollutant identified in the TMDL wasteload allocation? **N/A***
- j. *When applicable, include a proposed schedule for BMP modification to more effectively address the TMDL wasteload allocation. **N/A***

BMP 3.5 Household Waste Reduction

The City has an established schedule for household trash and recycling pickup service for residents. This is a weekly service free to all residents and the City provides recycling bins for residents. By providing a recycling service, the City reduces the amount of material that would be placed in a landfill or disposed of improperly. In addition, the City provides weekly pick up service of yard waste from March through January. This service also reduces the amount of material that would be placed in a landfill.

Schedule and Evaluation: The City will implement this BMP on an ongoing basis. The City will evaluate the program by measuring the tonnage of garbage and recycling materials collected on an annual basis. The City will also track the number of recycling bins distributed to residents to estimate the percentage of residents who recycle.

Responsible Party: City Refuse and Recycling Coordinator

Necessary Documents: Volume of trash and recyclables collected per year.

Measurable Goals: The City will track the tonnage of garbage and recyclables collected on an annual basis.

Items to be Reported in the Annual Report: The City's annual report will include information on the tonnage of recyclables and trash collected on an annual basis.

Modifications per Required BMP-Admin Update:

- a. *Does this BMP comply with the new General Permit or are modifications required? **Yes. No modifications required for compliance.***
- b. *If no modifications are required, then BMP remains the same. **N/A***
- c. *If modifications are required, what modifications are required? **N/A***
- d. *What is my proposed schedule for implementation of the modifications? **N/A***
- e. *Include the proposed schedule in the Schedule and Evaluation Section. **N/A***
- f. *Does the BMP address the pollutant identified in a TMDL wasteload allocation? **Yes***
- g. *Which TMDL wasteload allocation? **"Bacteria TMDL for Abrams Creek and Upper and Lower Opequon Creek Located in Frederick and Clarke County, Virginia" (VT BSE, 2003)***
- h. *How does the BMP address the pollutant identified in a TMDL wasteload allocation? **By collecting residential waste and transporting it to a sanitary landfill facility, the City reduces sources of bacteria and refuse, thus eliminating potential breeding grounds for wildlife that may also contribute bacteria to receiving waters. Yard waste is also collected on a regular basis, thus preventing the waste from being deposited in low lying riparian areas or in storm drains. The collection of yard waste eliminates potential hydraulic impediments that could destabilize streams and contribute to the sediment that has been determined to be the most significant stressor to benthic organisms in the streams of the Opequon watershed.***
- i. *How can the BMP be modified to be more effective in addressing the pollutant identified in the TMDL wasteload allocation? **N/A***
- j. *When applicable, include a proposed schedule for BMP modification to more effectively address the TMDL wasteload allocation. **N/A***

BMP 3.6 Illicit Discharge Elimination

The City has an established inflow and infiltration abatement program to replace or slipline sanitary sewers and manholes, thus preventing illicit discharge into the groundwater and streams.

Schedule and Evaluation: The City will implement this BMP on an ongoing basis and will replace or slipline an average of 5,000 linear feet of sanitary sewer per year. The City will evaluate the linear footage of sewer lined each year.

Responsible Party: City Engineer

Necessary Documents: As-built documentation of the linear footage of sanitary sewer replacement and repairs per year.

Measurable Goals: The City will track the linear footage of sanitary sewer replacement and repairs, and manhole replacement.

Items to be Reported in the Annual Report: The City's annual report will include information on the linear footage of sanitary sewer replacement and repair, and manhole replacements.

Modifications per Required BMP-Admin Update:

- a. *Does this BMP comply with the new General Permit or are modifications required? **Yes. No modifications required for compliance.***
- b. *If no modifications are required, then BMP remains the same. **N/A***
- c. *If modifications are required, what modifications are required? **N/A***
- d. *What is my proposed schedule for implementation of the modifications? **N/A***
- e. *Include the proposed schedule in the Schedule and Evaluation Section. **N/A***
- f. *Does the BMP address the pollutant identified in a TMDL wasteload allocation? **Yes***
- g. *Which TMDL wasteload allocation? **"Bacteria TMDL for Abrams Creek and Upper and Lower Opequon Creek Located in Frederick and Clarke County, Virginia" (VT BSE, 2003)***
- h. *How does the BMP address the pollutant identified in a TMDL wasteload allocation? **By providing a mechanism to reduce and prevent raw sewage from entering the receiving waters.***
- i. *How can the BMP be modified to be more effective in addressing the pollutant identified in the TMDL wasteload allocation? **N/A***
- j. *When applicable, include a proposed schedule for BMP modification to more effectively address the TMDL wasteload allocation. **N/A***

Minimum Control Measure (4): construction site stormwater runoff control

a. *The operator shall develop,, implement, and enforce procedures to reduce pollutants in any stormwater runoff to the regulated small MS4 from construction activities that result in a land disturbance of greater than or equal to one acre or equal to or greater than 2,500 square feet in all areas of the jurisdictions designated as subject to the Chesapeake Bay Preservation Area Designation and Management Regulations adopted pursuant to the Chesapeake Bay Preservation Act. Additionally, reduction of stormwater discharges from construction activity disturbing less than one acre must be included in the program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more.*

The procedures must include the development and implementation of, at a minimum:

(1) An ordinance or other mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance with the Erosion and Sediment Control Law and attendant regulations, to the extent allowable under state, tribal, or local law. Such ordinances and other mechanisms shall be updated as necessary;

(2) Requirements for construction site owners and operators to implement appropriate erosion and sediment control best management practices as part of an erosion and sediment control plan that is consistent with the Erosion and Sediment Control Law and attendant regulations and other applicable requirements of state, tribal or local law. Where determined appropriate by the operator, the operator shall encourage the use of structural and non structural design techniques to create a design that has the goal of maintaining or replicating predevelopment runoff characteristics and site hydrology;

(3) Requirements for construction site owners and operators to secure authorization to discharge stormwater from construction activities under a VSMP permit for construction activities that result in a land disturbance of greater than or equal to one acre or equal to or greater than 2,500 square feet in all areas of the jurisdictions designated as subject to the Chesapeake Bay Preservation Area Designation and Management Regulations adopted pursuant to the Chesapeake Bay Preservation Act. Additionally, stormwater discharges from construction activities disturbing less than one acre must secure authorization discharge under a VSMP permit if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more;

(4) Procedures for receipt and consideration of information submitted by the public; and

(5) Procedures for site inspection and enforcement of control measures.

b. *The operator shall ensure that plan reviewers, inspectors, program administrators and construction site owners and operators obtain the appropriate certifications as required under the Erosion and Sediment Control Law;*

c. *The operator shall track regulated land-disturbing activities and submit the following information in accordance with Section II E 2:*

(1) Total number of regulated land-disturbing activities; and

(2) Total disturbed acreage.

BMP 4.1 Continue program to require construction site operators to control waste

The City of Winchester's Water Protection Ordinance provides requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality, or procedures to ensure that construction site operators have secured or will secure a VPDES construction permit.

Schedule and Evaluation: The program is implemented. A construction plan approval process and site inspections during construction are used to evaluate and check on compliance with City ordinance.

Responsible Party: City Engineer

Necessary Documents: Responsible Land Developer (RLD) Name must be placed on the approved plans

Measurable Goals: Approval of the plan is granted by the program's authority. The measurable goal for this BMP is the percentage and number of constructions sites that meet compliance requirements first and follow-up, as needed, with site inspections.

Items to be Reported in the Annual Report: The City's annual report will include information on the percentage and number of construction sites that comply with the Water Protection Ordinance requirements.

Modifications per Required BMP-Admin Update:

- a. *Does this BMP comply with the new General Permit or are modifications required? **Yes. No modifications required for compliance.***
- b. *If no modifications are required, then BMP remains the same. **N/A***
- c. *If modifications are required, what modifications are required? **N/A***
- d. *What is my proposed schedule for implementation of the modifications? **N/A***
- e. *Include the proposed schedule in the Schedule and Evaluation Section. **N/A***
- f. *Does the BMP address the pollutant identified in a TMDL wasteload allocation? **No***
- g. *Which TMDL wasteload allocation? **N/A***
- h. *How does the BMP address the pollutant identified in a TMDL wasteload allocation? **N/A***
- i. *How can the BMP be modified to be more effective in addressing the pollutant identified in the TMDL wasteload allocation? **N/A***
- j. *When applicable, include a proposed schedule for BMP modification to more effectively address the TMDL wasteload allocation. **N/A***

BMP 4.2 Continue maintaining DCR E&S plan review, inspection and administration certification for a minimum of 2 City employees.

The City has two employees that have DCR E&S plan, inspection and administration certification and will maintain that certification. Should staff changes result in less than two certified employees, the City will have another employee certified to ensure that two trained and certified employees are on staff at all times.

Schedule and Evaluation: The City will maintain two employee certifications and promptly certify new employees should this number drop below two.

Responsible Party: City Engineer

Necessary Documents: N/A

Measurable Goals: The measurable goal for this BMP will be for the City to maintain two employees with DCR E&S plan, inspection and administration certification.

Items to be Reported in the Annual Report: The annual report will include information on the number of employees who are certified or a description of the action is taken if the number drops below two.

Modifications per Required BMP-Admin Update:

- a. *Does this BMP comply with the new General Permit or are modifications required? **Yes. No modifications required for compliance.***
- b. *If no modifications are required, then BMP remains the same. **N/A***
- c. *If modifications are required, what modifications are required? **N/A***
- d. *What is my proposed schedule for implementation of the modifications? **N/A***
- e. *Include the proposed schedule in the Schedule and Evaluation Section. **N/A***
- f. *Does the BMP address the pollutant identified in a TMDL wasteload allocation? **No***
- g. *Which TMDL wasteload allocation? **N/A***
- h. *How does the BMP address the pollutant identified in a TMDL wasteload allocation? **N/A***
- i. *How can the BMP be modified to be more effective in addressing the pollutant identified in the TMDL wasteload allocation? **N/A***
- j. *When applicable, include a proposed schedule for BMP modification to more effectively address the TMDL wasteload allocation. **N/A***

BMP 4.3 Continue enforcement of erosion and sediment control as well as stormwater management and water quality

The City of Winchester monitors all construction activities occurring within the City limits and relies on its erosion and sediment control program as regulated under the Virginia Erosion and Sediment Control Law (ESCL) and attendant regulations and on its stormwater management program as regulated under the Stormwater Management Act. The City is not within the Chesapeake Bay Watershed Preservation Area. The ESCL requires the protection of water quality through procedures that include plan review, inspection and enforcement down to projects disturbing areas greater than 1 acre. Plan review, inspection, enforcement requirements of this program are specified under this law. The City requires that all plans include the minimum standards outlined in the ESC Regulations. The requirements of the Erosion and Sediment Control, Stormwater Management and Quality, Plan Protection: Water Quantity and Water Quality, Stream Buffers, and Storm Sewer Discharges programs are provided in the City's Water Protection Ordinance. The City ordinance adopts the Virginia Erosion and Sediment Control Handbook and Stormwater Management Handbook as the standards and specifications for erosion and sediment control and stormwater management. Updates to the ordinance and the handbooks are completed as the City becomes aware of the changes.

Schedule and Evaluation: The City relies on the Department of Conservation and Recreation's Local Program review to determine the consistency and compliance with the VA ESC Law and attendant regulations. If the City fails to be found consistent, the City will work with DCR to develop a Corrective Action Agreement (CAA) suitable to both the City and DCR. The City will implement the CAA in accordance to the schedule included in the agreement.

Responsible Party: City Engineer

Necessary Documents: Chapter 9 (Water Protection) of the Winchester Code, State Erosion and Sediment Control Law (Virginia Code § 10.1-560 et seq.), Approved plans

Measurable Goals: Applications must provide the name of a certified Responsible Land Disturber (RLD). Land disturbance permits are not released for sites greater than or equal to one acre of disturbed area unless a Notice of Intent to apply for a VPDES permit is provided.

Items to be Reported in the Annual Report: The City's annual report will include information on the number of plans reviewed, number approved, and number requiring a VPDES permit.

Modifications per Required BMP-Admin Update:

- a. *Does this BMP comply with the new General Permit or are modifications required? **Yes. No modifications required for compliance.***
- b. *If no modifications are required, then BMP remains the same. **N/A***
- c. *If modifications are required, what modifications are required? **N/A***
- d. *What is my proposed schedule for implementation of the modifications? **N/A***
- e. *Include the proposed schedule in the Schedule and Evaluation Section. **N/A***
- f. *Does the BMP address the pollutant identified in a TMDL wasteload allocation? **Yes***
- g. *Which TMDL wasteload allocation? **"Opequon Watershed TMDLs for Benthic Impairments: Abrams Creek and Lower Opequon Creek, Frederick and Clarke Counties, Virginia" (VT BSE, 2003)***

Minimum Control Measure (4): construction site stormwater runoff control

- h. How does the BMP address the pollutant identified in a TMDL wasteload allocation? **The City takes an active role in reducing and managing the sediment loads associated with significant construction activities**
- i. How can the BMP be modified to be more effective in addressing the pollutant identified in the TMDL wasteload allocation? **N/A**
- j. When applicable, include a proposed schedule for BMP modification to more effectively address the TMDL wasteload allocation. **N/A**

BMP 4.4 Continue administering stormwater complaint hotline to identify problems at construction sites

As previously mentioned in other BMP measures, the City has an established stormwater complaint hotline. The flyer advertising the hotline also includes an emergency number to contact to report on illegal dumping of materials. The flyer is posted on the website and a utility bill insert was developed and planned for release with the water/wastewater utility bills in the December 2007 to January 2008 timeframe.

Schedule and Evaluation: The stormwater complaint hotline is advertised on website as well as in utility bill inserts in the December 2007 to January 2008 timeframe.

Responsible Party: City Engineer

Necessary Documents: Flyer on stormwater complaint hotline and utility bill inserts advertising the stormwater complaint hotline

Measurable Goals: The measurable goal for this BMP involves the number of complaints received from the stormwater complaint hotline that are associated with construction site problems.

Items to be Reported in the Annual Report: The City's annual report will include information on the number of complaints per year.

Modifications per Required BMP-Admin Update:

- a. Does this BMP comply with the new General Permit or are modifications required? **Yes. No modifications required for compliance.**
- b. If no modifications are required, then BMP remains the same. **N/A**
- c. If modifications are required, what modifications are required? **N/A**
- d. What is my proposed schedule for implementation of the modifications? **N/A**
- e. Include the proposed schedule in the Schedule and Evaluation Section. **N/A**
- f. Does the BMP address the pollutant identified in a TMDL wasteload allocation?
Yes
- g. Which TMDL wasteload allocation? **"Opequon Watershed TMDLs for Benthic Impairments: Abrams Creek and Lower Opequon Creek, Frederick and Clarke Counties, Virginia" (VT BSE, 2003)**
- h. How does the BMP address the pollutant identified in a TMDL wasteload allocation? **The City's complaint hotline allows residents to become the eyes and ears of the City to aid in the reduction of significant sediment loads to surface waters that are deemed to be impaired by excessive sediment loads.**
- i. How can the BMP be modified to be more effective in addressing the pollutant identified in the TMDL wasteload allocation? **N/A**

Minimum Control Measure (4): construction site stormwater runoff control

- j. *When applicable, include a proposed schedule for BMP modification to more effectively address the TMDL wasteload allocation. N/A*

BMP 4.5 Continue tracking regulated land disturbing activities

The City has an existing program by which land disturbing activities are tracked. This provides the necessary information to perform inspections, as-built inspections and surveys and develop and understanding of which areas may be most likely to incur heavier than normal sediment loading.

Schedule and Evaluation: The land disturbing activities are tracked as plans and notification are received. The total number of land disturbing activities and total disturbed acreage for the reporting period will be provided in the annual report.

Responsible Party: City Engineer

Necessary Documents: Land development permit applications

Measurable Goals: The measurable goal for this BMP involves the total number of regulated disturbing activities and total disturbed acreage for the reporting period.

Items to be Reported in the Annual Report: The City's annual report will include information on the total number of land disturbing activities and total disturbed acreage for the reporting period.

Modifications per Required BMP-Admin Update:

- a. *Does this BMP comply with the new General Permit or are modifications required? Yes. No modifications required for compliance.*
- b. *If no modifications are required, then BMP remains the same. N/A*
- c. *If modifications are required, what modifications are required? N/A*
- d. *What is my proposed schedule for implementation of the modifications? N/A*
- e. *Include the proposed schedule in the Schedule and Evaluation Section. N/A*
- f. *Does the BMP address the pollutant identified in a TMDL wasteload allocation? No*
- g. *Which TMDL wasteload allocation? N/A*
- h. *How does the BMP address the pollutant identified in a TMDL wasteload allocation? N/A*
- i. *How can the BMP be modified to be more effective in addressing the pollutant identified in the TMDL wasteload allocation? N/A*
- j. *When applicable, include a proposed schedule for BMP modification to more effectively address the TMDL wasteload allocation. N/A*

Minimum Control Measure (5): post construction stormwater management in new development and redevelopment

a. The operator shall develop, implement, and enforce procedures to address stormwater runoff to the regulated small MS4 from new development and redevelopment projects that disturb greater than or equal to one acre or equal to or greater than 2500 square feet in all areas of the jurisdictions designated as subject to the Chesapeake Bay Preservation Area Designation and Management Regulations adopted pursuant to the Chesapeake Bay Preservation Act, including projects less than one acre that are part of a larger common plan of development or sale, that discharge into the small MS4. The program must ensure that controls are in place that would prevent or minimize water quality impacts.

b. The operator shall:

(1) Develop and implement strategies which include a combination of structural and/or non-structural best management practices (BMPs) appropriate for the operator's community. Where determined appropriate by the operator, the operator shall encourage the use of structural and nonstructural design techniques to create a design that has the goal of maintaining or replicating predevelopment runoff characteristics and site hydrology;

(2) Use an ordinance, regulation or other mechanism to address post-construction runoff from new development and redevelopment projects to ensure compliance with the Virginia Stormwater Management Act (§ 10.1-603.1 et seq. of the Code of Virginia) and attendant regulations, and to the extent allowable under state, tribal or local law. Such ordinances and other mechanisms shall be updated as necessary;

(3) Require construction site owners and operators to secure authorization to discharge stormwater from construction activities under a VSMP permit for new development and redevelopment projects that result in a land disturbance of greater than or equal to one acre or equal to or greater than 2,500 square feet in all areas of the jurisdictions designated as subject to the Chesapeake Bay Preservation Area Designation and Management Regulations adopted pursuant to the Chesapeake Bay Preservation Act. Additionally, stormwater discharges from construction activity disturbing less than one acres must secure authorization to discharge under a VSMP permit if that construction activity is a part of a larger common plan of development or sale that would disturb one acre or more;

(4) Require adequate long-term operation and maintenance by the owner of structural stormwater management facilities through requiring the owner to develop a recorded inspection schedule and maintenance agreement to the extent allowable under state, tribal or local law or other legal mechanism. The operator shall additionally develop, through the maintenance agreement or other method, a mechanism for enforcement of maintenance responsibilities by the operator if they are neglected by the owner;

(5) Conduct site inspection and enforcement measures consistent with the Virginia Stormwater Management Act and attendant regulations; and

(6) Track all known permanent stormwater facilities that discharge to the regulated small MS4 and submit the following information in accordance with Evaluation and assessment requirements of this permit.

(a) Type of structural stormwater management facility installed as defined in the Virginia Stormwater Management Handbook:

(b) Geographic location (HUC);

(c) Where applicable, the impaired surface water that the stormwater management facility is discharging into; and

(d) Number of acres treated

Minimum Control Measure (5): post construction stormwater management in new development and redevelopment

BMP 5.1 Continue enforcement of erosion and sediment control as well as stormwater management and water quality

All site plans are reviewed for water quality calculations and plans must show compliance with the State stormwater management regulations regarding the phosphorus reductions required for development and redevelopment projects. Water quality BMPs are evaluated for site-appropriateness on a case-by-case basis and designers are encouraged to use the Virginia Stormwater Management Handbook as a guide for design. The City's Water Protection Ordinance addresses post-construction runoff from new and redevelopment projects. Sections 9-56 through 9-70 provide the regulations by which new and redevelopment projects should handle stormwater quantity and quality.

Schedule and Evaluation: The City will implement its program during all years of this permit. The City reviews all applicable development projects to determine the consistency and compliance with the state and local stormwater management laws and attendant regulations.

Responsible Party: City Engineer

Necessary Documents: Chapter 9 (Water Protection) of the Winchester Code, State Erosion and Sediment Control Law (Virginia Code § 10.1-603.1 et seq.), Approved plans.

Measurable Goals: The measurable goal for this BMP involves the type and number of BMPs installed, geographic location (HUC) of the BMPs, waterbody the BMP discharges to, number of acres treated to the nearest tenth of an acre, and inspection and maintenance schedules.

Items to be Reported in the Annual Report: The City's annual report will include information on the type and number of BMPs installed, geographic location (HUC) of the BMPs, waterbody the BMP discharges to, number of acres treated

Modifications per Required BMP-Admin Update:

- a. *Does this BMP comply with the new General Permit or are modifications required? **Yes. No modifications required for compliance.***
- b. *If no modifications are required, then BMP remains the same. **No***
- c. *If modifications are required, what modifications are required? **No***
- d. *What is my proposed schedule for implementation of the modifications? **No***
- e. *Include the proposed schedule in the Schedule and Evaluation Section. **No***
- f. *Does the BMP address the pollutant identified in a TMDL wasteload allocation? **No***
- g. *Which TMDL wasteload allocation? **N/A***
- h. *How does the BMP address the pollutant identified in a TMDL wasteload allocation? **N/A***
- i. *How can the BMP be modified to be more effective in addressing the pollutant identified in the TMDL wasteload allocation? **N/A***
- j. *When applicable, include a proposed schedule for BMP modification to more effectively address the TMDL wasteload allocation. **N/A***

BMP 5.2 Continue requiring BMP maintenance agreements for all privately owned water quality and quantity BMPs

BMP maintenance agreements are required for all privately owned water quality and water quantity BMPs. The City maintains a log of executed maintenance agreements and notifies all property owners of required inspections on an annual basis (if a property owner does not submit an inspection, the City will perform the inspection and charge the property owner) as well as tracking of the available information on public and private permanent BMPs.

Schedule and Evaluation: The City's program is implemented. The City will continue the current program and adjust as necessary for BMP effectiveness

Responsible Party: City Engineer

Necessary Documents: Chapter 9 (Water Protection) of the Winchester Code, BMP design plans and the executed maintenance agreement.

Measurable Goals: The measurable goals for this BMP involves requiring BMP maintenance agreements on all new privately owned properties and receipt of annual inspection reports or private owner payment for the City to conduct the inspection.

Items to be Reported in the Annual Report: The City's annual report will include information on the results of the total BMP inspection program regarding the number of BMPs inspected, the number in compliance with operation and maintenance requirements, and the number taking action to correct deficiencies.

Modifications per Required BMP-Admin Update:

- a. *Does this BMP comply with the new General Permit or are modifications required? **Yes. No modifications required for compliance.***
- b. *If no modifications are required, then BMP remains the same. **N/A***
- c. *If modifications are required, what modifications are required? **N/A***
- d. *What is my proposed schedule for implementation of the modifications? **N/A***
- e. *Include the proposed schedule in the Schedule and Evaluation Section. **N/A***
- f. *Does the BMP address the pollutant identified in a TMDL wasteload allocation? **No***
- g. *Which TMDL wasteload allocation? **N/A***
- h. *How does the BMP address the pollutant identified in a TMDL wasteload allocation? **N/A***
- i. *How can the BMP be modified to be more effective in addressing the pollutant identified in the TMDL wasteload allocation? **N/A***
- j. *When applicable, include a proposed schedule for BMP modification to more effectively address the TMDL wasteload allocation. **N/A***

Minimum Control Measure (6): pollution prevention/good housekeeping for municipal operations

Develop and implement an operation and maintenance program consistent with the MS4 Program Plan that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations. Using training materials including those available from EPA, state, tribe, or other organizations, the program shall include employee training to prevent and reduce stormwater pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and MS4 maintenance.

The operator shall identify, implement, evaluate and modify, as necessary, BMPs to meet the following pollution prevention/good housekeeping for municipal operations measurable goals:

- a. Operation and maintenance programs including activities, schedules and inspection procedures shall include provisions and controls to reduce pollutant discharges into the regulated small MS4 and receiving surface waters;*
- b. Illicit discharges shall be eliminated from storage yards, fleet or maintenance shops, outdoor storage areas, rest areas, waste transfer stations, and other municipal facilities;*
- c. Waste materials shall be disposed of properly;*
- d. Materials that are soluble or erodible shall be protected from exposure to precipitation;*
- e. Materials, including by not limited to fertilizers and pesticides, that have the potential to pollute receiving surface waters shall be applied according to manufacturer's recommendations; and*
- f. For state agencies with lands where nutrients are applied, nutrient management plans shall be developed and implemented in accordance with the requirements of §10.1-104.4 of the Code of Virginia.*

BMP 6.1 Continue implementing City Yards SWP3 and update every 3 years

The City Yards has a Stormwater Pollution Prevention Plan (SWP3) in place. The plan outlines planned improvements to the City yards that will eliminate potential sources of pollution and provides recommendations to improve the water quality of runoff from the site. Standard Operating Procedures (SOPs) are a part of the SWP3. The SWP3 is reviewed and updated annually.

Schedule and Evaluation: The SWPPP makes reference to VPDES Permit No. VAR050822, which requires quarterly visual monitoring as well as annual facility inspections. Both of these evaluations have documentation requirements that will be carried out in accordance with the SWP3, dated March 2005.

Responsible Party: City Engineer

Necessary Documents: SWP3 and SOPs as necessary.

Measurable Goals: The measurable goal for this BMP involves compliance with the schedule and SOPs in the SWP3.

Items to be Reported in the Annual Report: The City's annual report will include information on the annual updates and additional SOPs, if any, that are added to the SWP3.

Modifications per Required BMP-Admin Update:

- a. Does this BMP comply with the new General Permit or are modifications required? **Yes. No modifications required for compliance.***
- b. If no modifications are required, then BMP remains the same. **N/A***
- c. If modifications are required, what modifications are required? **N/A***

Minimum Control Measure (6): pollution prevention/good housekeeping for municipal operations

- d. *What is my proposed schedule for implementation of the modifications?* **N/A**
- e. *Include the proposed schedule in the Schedule and Evaluation Section.* **N/A**
- f. *Does the BMP address the pollutant identified in a TMDL wasteload allocation?*
No
- g. *Which TMDL wasteload allocation?* **N/A**
- h. *How does the BMP address the pollutant identified in a TMDL wasteload allocation?* **N/A**
- i. *How can the BMP be modified to be more effective in addressing the pollutant identified in the TMDL wasteload allocation?* **N/A**
- j. *When applicable, include a proposed schedule for BMP modification to more effectively address the TMDL wasteload allocation.* **N/A**

BMP 6.2 Continue use of salt storage building and vehicle washing facility at City Yards

The City operates and maintains salt storage and vehicle washing at facilities recently constructed at the City Yards site.

Schedule and Evaluation: The facilities are completed and all salt and City vehicle washing is to occur within the facilities.

Responsible Party: Public Works Operations Superintendent

Necessary Documents: N/A

Measurable Goals: The measurable goal for this BMP involves the monthly City Yard inspection by the City Engineer or designate to observe that salt and vehicle washing are contained with the respective facilities.

Items to be Reported in the Annual Report: The City's annual report will include information on corrective measures taken if inspection finds that the facilities are not being used as designed and planned.

Modifications per Required BMP-Admin Update:

- a. *Does this BMP comply with the new General Permit or are modifications required?* **Yes. No modifications required for compliance.**
- b. *If no modifications are required, then BMP remains the same.* **N/A**
- c. *If modifications are required, what modifications are required?* **N/A**
- d. *What is my proposed schedule for implementation of the modifications?* **N/A**
- e. *Include the proposed schedule in the Schedule and Evaluation Section.* **N/A**
- f. *Does the BMP address the pollutant identified in a TMDL wasteload allocation?*
No
- g. *Which TMDL wasteload allocation?* **N/A**
- h. *How does the BMP address the pollutant identified in a TMDL wasteload allocation?* **N/A**
- i. *How can the BMP be modified to be more effective in addressing the pollutant identified in the TMDL wasteload allocation?* **N/A**
- j. *When applicable, include a proposed schedule for BMP modification to more effectively address the TMDL wasteload allocation.* **N/A**

BMP 6.3 Continue training of City employees on Environmental Management Systems (EMS)

The City requires all employees to attend a short training session on Environmental Management Systems to raise the awareness among employees of environmental impacts around them.

Schedule and Evaluation: Employees are scheduled for mandatory EMS training when they are hired.

Responsible Party: City Engineer

Necessary Documents: EMS training documents

Measurable Goals: The measurable goal for this BMP involves the training of all employees.

Items to be Reported in the Annual Report: The City's annual report will include information on compliance with the City EMS training requirement of all employees.

Modifications per Required BMP-Admin Update:

- a. *Does this BMP comply with the new General Permit or are modifications required? **Yes. No modifications required for compliance.***
- b. *If no modifications are required, then BMP remains the same. **N/A***
- c. *If modifications are required, what modifications are required? **N/A***
- d. *What is my proposed schedule for implementation of the modifications? **N/A***
- e. *Include the proposed schedule in the Schedule and Evaluation Section. **N/A***
- f. *Does the BMP address the pollutant identified in a TMDL wasteload allocation? **No***
- g. *Which TMDL wasteload allocation? **N/A***
- h. *How does the BMP address the pollutant identified in a TMDL wasteload allocation? **N/A***
- i. *How can the BMP be modified to be more effective in addressing the pollutant identified in the TMDL wasteload allocation? **N/A***
- j. *When applicable, include a proposed schedule for BMP modification to more effectively address the TMDL wasteload allocation. **N/A***

BMP 6.4 Continue street sweeping program and track amount of litter and debris removed

City streets are swept on a regular basis to remove pollutants and improve appearance. This program removes significant amounts of sediment and debris that would otherwise be washed into the storm drain system.

Schedule and Evaluation: Downtown streets are swept twice weekly, primary streets once weekly, and side streets once a month on average.

Responsible Party: Public Works Operations Superintendent

Necessary Documents: Logs of sweeping activities

Measurable Goals: The measurable goal for this BMP involves the miles of streets swept annually during the reporting period.

Items to be Reported in the Annual Report: The City's annual report will include information on the number of miles of streets swept annually during the reporting period.

Modifications per Required BMP-Admin Update:

- a. *Does this BMP comply with the new General Permit or are modifications required? **Yes. No modifications required for compliance.***
- b. *If no modifications are required, then BMP remains the same. **N/A***
- c. *If modifications are required, what modifications are required? **N/A***
- d. *What is my proposed schedule for implementation of the modifications? **N/A***
- e. *Include the proposed schedule in the Schedule and Evaluation Section. **N/A***
- f. *Does the BMP address the pollutant identified in a TMDL wasteload allocation? **Yes***
- g. *Which TMDL wasteload allocation? **All existing and future wasteloads***
- h. *How does the BMP address the pollutant identified in a TMDL wasteload allocation? **This BMP is a direct removal mechanism for a significant area of impervious cover that is associated with essentially every known pollutant including, but not limited to sediment, nutrients, bacteria, metals, etc.***
- i. *How can the BMP be modified to be more effective in addressing the pollutant identified in the TMDL wasteload allocation? **N/A***
- j. *When applicable, include a proposed schedule for BMP modification to more effectively address the TMDL wasteload allocation. **N/A***