



National Pollutant Discharge Elimination System (NPDES)

**Storm Water Management Program
Site Registration Form**

for

West Virginia

Municipal Separate Storm Sewer Systems (MS4s)

General Permit WV0116025

The site registration application (SRA) is for local governments or other regulated entities to submit the required information necessary for their Stormwater Management Program (SWMP) for compliance under the National Pollutant Discharge Elimination System (NPDES) MS4 General Permit to discharge stormwater runoff from a small municipal separate storm sewer system (MS4).

An authorized signature as required by 47CSR10 is needed to complete the application. All information should be included on this form or if needed, additional information can be attached at the end of the SRA.

Two (2) copies of the site registration application form shall be mailed to the address below.

**West Virginia Department of Environmental Protection
Division of Water and Waste Management – MS4 Program
601 57th Street, SE
Charleston, WV 25304**

Section I. General Information

MS4 Operator

Part II A.

1.a. Name of City, County or other public entity that operates a small MS4:

_____The City of Huntington, West Virginia_____

1.b. Mailing Address:

___P O Box 1659 Huntington, WV 25717_____

Local staff contact, person responsible for overall program implementation and coordination.
(This is the person DEP will contact as the need arises for more information and/or details about your stormwater management program or general questions concerning stormwater in your community.)

1.c. Jennifer Williams

1.d. Contractor – MS4 project

1.e. 304-840-2500

1.f. seedsoflove76@yahoo.com

Certification

47CSR10

By completing and submitting this application, I have reviewed and understand and agree to the terms and conditions of #WV0116025 small MS4 General Permit issued on June 22, 2009. I understand that provisions of the MS4 general permit are enforceable by law. Violations of any term and condition of the general permit and/or other applicable law or regulations can lead to enforcement action.

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.

2.a. Authorized signature _____
(Mayor or Principle Executive Officer)

2.b. Print name _____

2.c. Title _____

2.d. Date _____

Co-permittees (Complete this section if co-permitting with another MS4 entity)
Part III. A.

- 3.a. Name of MS4 Operator
- 3.b. Contact person
- 3.c. Telephone
- 3.d. Address
- 3.e. Email address
- 3.f. Have legal agreements been finalized between co-permittees?
- 3.g. If yes, provide agreement with this application. (With signatures)

Section II. Storm Sewer System

Description of storm sewer system

Area (in acres) that drains into the MS4 from outside the corporate or jurisdictional boundaries:

Guyandotte River Inside city: 2432 acres, outside city 3898

Fourpole Creek Inside city: 4521 acres, outside city 10,488

Twelvepole Creek Inside city: 18 acres, outside city 11,003

- 4.b. Area (in acres) within current corporate or jurisdictional boundaries: 11,897 acres
- 4.c. For all MS4s, population (using the most recent U.S. Census data) for area served: 49,138

Part IV.B.

- 4.d. Latitude and Longitude of representative outfall:
Longitude- Degrees: 82 Minutes: 27 Seconds: 4.9
Latitude- Degrees: 38 Minutes: 25 Seconds: 9.0

Tip: The MS4 general permit requires that you sample from one representative outfall twice a year. The location of this outfall will be in your most densely populated area.

Part IV.B.

- 4.e. Describe the physical location of your representative outfall. If a street address is not possible use cross street descriptions.

The representative outfall is located on the North side of Fourpole creek near 5th Street. 5th Street is a busy thoroughfare which is a highly traveled exit from interstate 64. The outfall is marked on the google map representation on our stormwater page.

Part IV.B.

- 4.f. Describe your monitoring plan to include the frequency and parameters.

Sampling the representative outfall; along Fourpole Creek at 5th Street will commence once the SWMP is approved by DEP. Stormwater samples will be collected during the “first flush” of rainfall runoff, at least

twenty minutes, but not more than fifty minutes after a rainfall of at least 0.5 inches has begun, preceded by a period of dry weather of at least 48 hours. The representative outfall will be sampled twice per year for the following parameters:

Parameter	EPA Method No.	Method Detection Limit (mg/l)
Total Kjeldahl Nitrogen	351.4	0.03
Nitrate Nitrogen	300.0	0.002
Nitrite Nitrogen	300.0	0.004
Total Nitrogen	*	*
Total Phosphorus	365.4	0.01
Fecal Coliform	SM9222D	NA
TSS	160.2	4
Aluminum	202.1	.1

*Total nitrogen shall be reported as the total of Total Kjeldahl Nitrogen, Nitrate, and Nitrite.

It should be noted that the parameters of impairment listed for the Guyandotte River are mining related impacts; Dissolved Aluminum, pH, Fe, and Mn. Therefore they will not be included in the list of parameters tested at the representative outfall along Fourpole Creek.

Collection of Samples

- Water samples will be gathered downstream of the representative outfall as per collection methods expressed in the *West Virginia Save Our Streams Program Advanced Standard Operating Procedures Manual*.
- Sampling containers will be provided by the independent testing laboratory.
- Samples will be collected and stored in an ice filled cooler then transported to the lab within 6 hours of the collection.
- Chain of Custody forms will ensure accuracy in handling and results.

Storm Sewer Infrastructure

Provide the most accurate number possible.

5.a. Storm sewers, in feet	22 miles
5.b. Open ditches, in feet	Unknown
5.c. Outfalls	More than 114
5.d. Catch basins	More than 2,400
5.e. Detention* facilities	None
5.f. Retention** facilities	None
5.g. Treatment facilities	One sewage treatment facility
5.h. Regional stormwater facilities	None

- 6.a. Does your MS4 receive stormwater discharges from WVDOT storm sewer system, roads or right-of-ways? yes

Huntington, West Virginia small MS4 general permit site registration application

- 6.b. Does your MS4 discharge into WVDOT storm sewer systems or right-of-ways? yes
- 7. Is your MS4 interconnected with another MS4? (Does stormwater flow into or out of your storm sewer system to or from another MS4?) If yes, describe. Marshall University, VA hospital
- 8. Does your municipality contain combined sewer systems? yes
- 9.a. What percentage is drained by Combined Sewer System? 70-80%
- 9.b. What percentage is drained by separate storm sewer system? 20-30%

Industrial Facilities owned by the MS4 entity

Part II.C.b.6.d.

- 10.a. Does your MS4 own and/or operate an industrial facility that discharges stormwater into the MS4?
yes

Tip: These types of facilities include vehicle maintenance garages, vehicle washing or fueling areas, parks and recreational facilities that may store chemicals, pesticides and/or fertilizers, salt storage facility, waste transfer facility, wastewater treatment plants and any other industrial facility. Please note, additional information about your facilities must be provided under Minimum Control Measure #6.

- 10.b. If yes, how many? 2
City garage, and the floodwall building-salt storage area

All city-owned facilities will be evaluated for industrial discharges under BMP 6(a) Municipal Facility inspections. The city is currently working to minimize exposure of industrial facilities to stormwater by removing above ground storage tanks (ASTs), fuel pumps, and equipment located at the city garage and acquiring a covered storage area for salt.

Map Requirements

Please provide a legible map that identifies the following information: attached

- 12.a. City, County or jurisdiction boundaries
- 12.b. State or Federal operated vocational/college/university campuses and military institutions
- 12.c. Urban area as defined by the 2000 Census, use 2010 Census data if available
- 12.d. Municipal, County, or State wastewater treatment plants and their associated outfalls
- 12.e. Landfills
- 12.f. Municipal, County or State operated vehicle or fleet maintenance garages
- 12.g. Any other Municipal, County or State operated industrial activities, these could include; salt storage areas, parks and recreational areas, chemical storage areas, etc.
- 12.h. Arterial, Municipal, or State roads
- 12.i. Stormwater discharge points and receiving streams
- 12.j. Streams and waterways within the MS4
- 12.k. Delineation of watershed area that drains into your MS4

Part.II.C.b.3.a.iv.

12.l. Submit paper maps folded to 8.5” x 11”.

Part.II.C.b.3.a.iv.

12.m. Multiple maps must be of the same scale, 1:1000 or 1:2000.

Receiving Streams and Impaired Waterbodies/TMDLs

13. Locations & Pollutants of Concern

Name of receiving stream*	Impaired? Yes or No	Parameters of impairment**	Has a TMDL been established?*** Yes or No
Ohio River	Yes	Dioxin	Yes
Guyandotte River (lower)	Yes	Fecal Coliform, pH, Al(d), Fe, Mn	Yes
Fourpole Creek Includes: Hisey Fork, Medley Fork, and Grapevine Branch	Yes	Aluminum, Fecal Coliform	Yes
Pats Branch	Yes	Cu, Fl	No
Krouts Creek	Yes	Al, Fecal Coliform	No, 2018
Twelvepole Creek	Yes	Fecal Coliform, Fe	Camp Creek of Twelvepole has TMDL, not in our jurisdiction

*Only Fourpole Creek outfalls have been mapped. Other receiving stream information needs to be verified by field reconnaissance. This will be conducted under BMP 3(a) Storm Sewer Mapping.

** (TMDL information gathered and checked by WV Conservation Agency conservation specialist, Mark Buchannan)

****IMPORTANT****

MS4s that discharge into a receiving water which has been listed on the West Virginia Section 303(d) list of impaired waters, and with discharges that contain the pollutant(s) for which the water body is impaired, **must document in the SWMP how the BMPs will control the discharge of the pollutant(s) of concern.** They must demonstrate that there will be no increase of the pollutants of concern. As you work your way through, describing the various practices, consider how that BMP will address or control the pollutant of concern.

If your MS4 discharges into a water body with an approved TMDL, and that TMDL contains requirements for control of pollutants from the MS4 stormwater discharges, then your SWMP must include BMPs **specifically targeted to achieve the wasteload allocations prescribed by the TMDL.** A monitoring component to assess the effectiveness of the BMPs in achieving the wasteload allocations must also be

included in the SWMP. Monitoring shall be specific for the pollutants of concern and be of sufficient frequency to determine if the stormwater BMPs are adequate to meet wasteload allocations. Monitoring can entail a number of activities including but not limited to: outfall monitoring, in-stream monitoring, and/or modeling.

14.a. List and quantify the BMPs you plan to implement to address each impairment. For each BMP describe how it is expected to control the pollutant of concern.

Several streams within our municipality have been listed on the EPA's 303(d) list of impaired waters, in part, because they exceed the water quality Total Maximum Daily Load (TMDL) for fecal coliform bacteria. Based on data from studies of Fourpole Creek, Krout Creek and the Guyandotte River it appears there is a hazardous amount of fecal contamination present, and that the creeks and river are likely unsafe both for recreational use and use as drinking water. The total maximum daily load (TMDL) endpoint for fecal coliform was determined to be 380 counts per 100 ml, based on the 400 counts per 100 ml criterion for human health minus a 5% margin of safety (USEPA, 2002).

Some possible nonpoint sources of fecal coliform bacteria include:

- Leaking sanitary sewers
- Failing septic systems
- Illicit sewer connections from homes
- Runoff from pastureland with grazing livestock
- Wildlife contributions

Point Sources:

- Malfunctioning permitted facilities could account for the often high fecal coliform bacteria observations in the stream during low flow periods.
- The largely urban area of the city of Huntington is a significant source of fecal coliform bacteria to the stream.

Other impairments include high levels of metals, which have also impaired Pat's Branch and Twelvepole Creek. Higher metals loadings are contributed by barren land, construction sites, surface-mined, or agricultural land than by forest because runoff and erosion potential is greater for land without adequate vegetative cover.

The urbanization and paving of large areas of the watershed can also result in dramatic increases in stormwater runoff, which leads to periodic high flows that erode streambanks and contribute increased amounts of silt and associated metals to the creek bottom. Where West Virginia soils are naturally high in aluminum, an increase in sediment to the stream results in an increase in total aluminum in the water.

Sediment from nonpoint sources may be carried into streams through surface runoff and through erosion from unpaved areas and disturbed sites. The impervious land area associated with paved roads in urban areas increases the stormwater runoff, which leads to periodic high flows that erode land surface and stream banks and contribute increased amounts of sediment and associated metals to the creek. It is assumed that reduction in sediment would in turn result in a reduction of metals to the watershed.

The dioxin level in the Ohio River cannot be remedied by our programs.

Twelvepole Creek does not have an accepted TMDL for the part of the creek that is in our jurisdiction.

Pats Branch does not have a TMDL, only a report.

Krout Creek does not have TMDL.

The Guyandotte River has, in addition, Fe and Mn, which although they may have contributions from sediment, are known to be common pollutants from mining operations. Other than the BMPs for reduction in erosion and sediment used to reduce aluminum, we do not have much control over these. (Mark Buchanan, WV Conservation Agency provided this information.)

TMDL information was gathered from Dr. Jeffrey Kovatch, Ecology professor at Marshall University, Mark Buchanan, Conservation Specialist, WV Conservation Agency and the WVDEP TMDL reports.

BMPs

BMP 1(a) Stormwater Newsletter bill inserts- This educational publication will be used to create awareness about sources of stormwater pollution, impacts from leaking/failed septic systems, impacts from impervious surface, TMDL pollutants of concern, erosion and sediment control, illicit discharge impacts/reporting, ordinances/regulations related to stormwater pollution, and pet waste. The publication will be distributed to all Huntington Sanitary Board customers and is expected to help change customer habits resulting in a decrease in sediment and fecal coliform impacts.

BMP 1(b) Articles and Announcements- Educational articles will be used to create awareness about pollutant sources. Topics will include: stormwater pollution prevention, impacts from leaking and failed septic systems and HAU systems, local training/workshops/events, and urban runoff. The articles are expected to help change readers' habits resulting in a decrease in fecal coliform impacts.

BMP 1(c) Stormwater Website and Facebook Page- Educational information on the website will be used to create awareness about landscaping, impacts of leaking and failing septic systems and home aeration units, rain water reuse, BMPs for chemical storage, BMPs for auto repair/maintenance, runoff reduction, and swimming pool draining. The SWMP, and annual reports will be posted on the website dedicated to the MS4 program. Visitors to the website will be able to send comments and illicit discharge reports via the website. The website is expected to help change readers' habits resulting in a decrease in fecal coliform impacts. Construction runoff ordinances, specifications and BMPs will be listed on the website as well and should help increase knowledge and use of BMPs, thus reducing sediment runoff.

BMP 1(d) Public Meetings/Stormwater Committee (SWC) Meetings- Public meetings will be advertised in advance and held to educate the public and solicit feedback on the following topics: sediment and erosion control, specific actions to take to reduce aluminum and fecal coliform in runoff, local ordinances/regulations, technical standards, runoff reduction, stormwater treatment and flow control BMPs, and general stormwater education. The meetings are expected to help change habits resulting in a decrease in sediment and fecal coliform impacts.

Volunteer Sampling Training- Volunteers, in conjunction with the Cabell County Health Department and other state agencies have been sampling the Fourpole Creek watershed for fecal coliform since 2010 and recently started monitoring Aluminum. The effort is expected to continue with data shared with the City. The volunteer samples will help to get the most accurate data and will help us to identify areas of possible illicit discharge and excess sediment.

BMP 1(f) Pet Waste Disposal Fact Sheet and Public Signage- Fact sheets will be distributed and signs will be posted publically to educate pet owners on proper disposal of pet waste. By preventing improper pet waste disposal, this educational campaign will prevent a source of bacteria that is contributing to fecal coliform impairments receiving waters.

BMP 1(h) Septic Tank and HAU maintenance and leak detection fact sheets from the DEP website will be distributed at public events and through the Cabell Huntington Health Department sanitarians. Homeowner detection of system failure and regular maintenance reminders will help to reduce fecal coliform bacteria impairments.

BMP 3(a) Storm Sewer Mapping- Field reconnaissance and GPS will be used to map the MS4 system. Mapping will be utilized to target areas for illicit discharge investigations, target land use for educational campaigns, and to track potential illicit discharges and spills. Improper sanitary connections, dumping, spills, and other illicit discharges will be tracked and attempts will be made to eliminate sources of illicit discharge.

BMP 3(b) Illicit Discharge Ordinance- The IDDE Ordinance was drafted to prohibit illicit connections and non-stormwater discharges to the MS4 system. Improper sanitary connections, dumping, spills, and other illicit discharges will be tracked and attempts will be made to eliminate sources of illicit discharge. Enforcement measures outlined in the ordinance will be utilized. We will review and update our IDDE ordinance annually.

BMP 3(c) Stormwater Field Assessments- Outfall inspections will be conducted using the outfall reconnaissance sheet from the Center for Watershed Protection (CWP). Field assessments will examine outfalls for evidence of improper sanitary connections, dumping, spills, and other illicit discharges and these illicit discharges will be eliminated.

BMP 3(d) Illicit Discharge Reporting on the Stormwater Webpage- Members of the public are encouraged to report spills and illicit discharges to the webpage, which is advertised on the site and through other media (bill inserts, newspaper articles, etc.). The inspector responds to reports and follows SOPs to trace the source of the discharge and take action to eliminate the discharge.

BMP 4(a) Construction Site Ordinance- Construction Stormwater Regulations were passed December 27, 2010. Those regulations define a permitting system for land disturbance activities, plan submission requirements, review, and inspection and enforcement procedures. Erosion and sediment control regulation and enforcement will be utilized to keep sediment, which could contain pollutants of concern such as Aluminum and other metals, from entering the MS4 system and receiving waters.

BMP 4(e) Construction Site Inspections- The Public Works director will implement a policy that self-inspections are to be required weekly and after ½ inch rain events and self-inspection reports must be available to city upon request. The City of Huntington has the right to conduct routine inspections, random inspections, inspections based on complaints or other notice of possible violations, and joint inspections with other agencies. Inspection reports will be kept with the contractor for one year. Erosion and sediment control inspections and their associated enforcement will be utilized to keep sediment, which could contain aluminum and other metals, from entering the MS4 system and receiving waters.

BMP 5(a) Wasteload Allocation and Stormwater Monitoring-Monitoring of stormwater runoff and receiving waters will be utilized to evaluate the effectiveness of BMPs in reducing fecal coliform, aluminum and other metals.

BMP 5 (b) Revisions to Post-Construction Ordinance and Standards- Post-construction requirements will be utilized to keep sediment and other pollutants associated with the particular land development, which could include pollutants of concern, from entering the MS4 system and receiving waters.

Part III.D.1.b & Part III.D.2

14.b. Describe your monitoring plan for impaired waterbodies and those with TMDLs. Give locations and frequencies.

Sampling the representative outfall; along Fourpole Creek at 5th Street will commence once the SWMP is approved by DEP. Stormwater samples will be collected during the “first flush” of rainfall runoff, at least twenty minutes, but not more than fifty minutes after a rainfall of at least 0.5 inches has begun, preceded by a period of dry weather of at least 48 hours. The representative outfall will be sampled twice per year for the following parameters:

Parameter	EPA Method No.	Method Detection Limit (mg/l)
Total Kjeldahl Nitrogen	351.4	0.03
Nitrate Nitrogen	300.0	0.002
Nitrite Nitrogen	300.0	0.004
Total Nitrogen	*	*
Total Phosphorus	365.4	0.01
Fecal Coliform	SM9222D	NA
TSS	160.2	4
Aluminum	202.1	.1

*Total nitrogen shall be reported as the total of Total Kjeldahl Nitrogen, Nitrate, and Nitrite.

It should be noted that the parameters of impairment listed for the Guyandotte River are mining related impacts; Dissolved Aluminum, pH, Fe, and Mn. Therefore they will not be included in the list of parameters tested at the representative outfall along Fourpole Creek.

Collection of Samples

- Water samples will be gathered downstream of the representative outfall as per collection methods expressed in the *West Virginia Save Our Streams Program Advanced Standard Operating Procedures Manual*.
- Sampling containers will be provided by the independent testing laboratory.
- Samples will be collected and stored in an ice filled cooler then transported to the lab within 6 hours of the collection.
- Chain of Custody forms will ensure accuracy in handling and results.

Sampling of receiving waters along Fourpole Creek are currently being conducted by the Fourpole Creek Watershed Association technical committee in conjunction with the local health department, with an independent lab providing the analysis. This sampling, and other BMPs to be conducted in cooperation with the FCWA, are included in this SRA as important components of the TMDL requirements.

The FCWA in conjunction with the Cabell County Health Department have been collecting fecal coliform water quality samples at 23 sites within the Fourpole Creek Watershed on a biannual basis. Recently Aluminum testing was added. The sampling locations, listed below, were chosen as representative of respective subwatersheds referenced in the TMDL. The grab samples will be analyzed by the Bender and Associates (Independent Lab) for fecal coliform, TSS and Aluminum. Flow data will be recorded in the effort. The FCWA sampling, as well as City staff's monitoring of the representative outfall, will be used to fulfill the monitoring requirement of the discharge to impaired waters section of the general permit.

site	Location
1	Four Pole @Park Ave Bridge
2	Gimlet Hollow at St Clouds
3	Harvey Rd Bridge Main stem Fourpole
4	Hisey Fk on Harvey Rd Upstream from bridge
5	Hisey Fk behind Mkt at Harvey town Rd X Greenridge Rd
6	Medley Fork under I 64 overpass
7	1 st street Fourpole main stem
8	Miller Road
9	Pleasant Valley Rd of Hisey Fork
10	5 th street Rd
11	12 th street below bridge Fourpole
12	Washington BLVD UNT
13	Fourpole Washington BLVD
14	Fourpole above Woodville Drive
15	Woodville Drive UNT
16	Mount Union Rd UNT above x Four Pole Creek Rd.
17	Fourpole Creek above X Mt Union Rd
18	Norwood Rd UNT
19	Fourpole Creek Below Norwood
20	Hite Saunders
21	Grapevine Br @ Rich gas station
22	Fourpole above Prices Creek
23	Fourpole Prices Creek

Only Fourpole Creek outfalls have been mapped. Other receiving stream information needs to be verified by field reconnaissance. This will be conducted under BMP 3(a) Storm Sewer Mapping. In addition to Fourpole Creek, TMDLs have been established for Ohio River and Guyandotte River (lower). Once outfalls to these receiving waters are confirmed and mapped, a sampling plan will be established to monitor for parameters of impairment.

14.c. If visual documentation of removal of pollutant sources, is a component of your plan please describe fully. For example, do you plan to use before and after photos?

An outfall reconnaissance sheet from the Center for Watershed Protection (CWP) will be utilized for outfall inspections as summarized in BMP 3(c). Visual parameters recorded on the sheets are color, turbidity, floatables, deposits/stains, abnormal vegetation, poor pool quality, and pipe benthic growth. The presence, description, and severity of any odor are also recorded.

We will document removal of pollutant sources by taking before and after photos when possible.

Evaluating the effectiveness of your SWMP for impaired waterbodies/TMDLs

The SWMP includes several effective measures that will help the City meet the waste load allocations of the TMDLs. These activities include: construction site runoff controls and a diligent inspection and enforcement effort to ensure compliance; a sewer system reconnaissance program to identify and eliminate failing sections of infrastructure, illicit discharges, and failing septic systems; municipal employee practices such as street sweeping, and use of vactor truck as well as targeted public outreach and participation programs, such as pet waste stations, community clean ups, volunteer training, etc.

- The following indicators will be tracked to determine if fecal coliform and Aluminum loads, and TSS discharged from the MS4 are being reduced by implementation of the SWMP:
- Sampling for fecal coliform, TSS and Aluminum will be conducted twice per year at the representative outfall.
- Visual outfall inspections and outfall flow monitoring will be conducted annually
- Illicit discharge monitoring (under Part IV.B. above) will note evidence of fecal coliform and
- Illicit discharge tracking (under Part II.C.b.3.c. below) will note removal of fecal coliform and metal sources
- Measurable Goals for BMPs (described in 14.a above) related to the TMDL will be tracked
- FCWA receiving water sampling for fecal coliform , total suspended solids (TSS), Aluminum at 23 locations

14.e. Explain how will you determine if your SWMP and mix of BMP's need to be modified to meet wasteload allocations?

BMPs related to TMDLs will be monitored and documented and the change in wasteload of fecal coliform , TSS and Aluminum will be estimated based on ongoing monitoring. These parameters will then be evaluated to determine if BMPs are effective at reducing waste load.

If evaluation of the above indicators shows that the SWMP and BMPs are unsuccessful in reducing the concentrations of TSS, Aluminum and fecal coliform in receiving waters, the SWMP and BMPs will be modified to more effectively reduce the discharge of TSS, Aluminum and fecal coliform from the MS4. Through implementation of our BMPs, we hope to achieve the following:

- A reduction in fecal coliform concentrations from the representative outfall
- The elimination of illicit discharges through visual outfall inspections, illicit discharge monitoring, and illicit discharge tracking
- Consistent improvement in measurable goals related to TMDLs (described in 14.a above)

- Reduction in fecal coliform, TSS and Aluminum concentrations as evidenced from FCWA and volunteer sampling.

Section III. Minimum Control Measures

Public Education and Outreach on Storm Water Impacts – MCM #1

Part II.C.b.1.

Responsible Person

Identify the responsible person(s) for implementing this MCM. (There may be more than one person or different departments that provide outreach to various targeted groups. If so, discuss.)

- 15.a. Name: David Hagley
- 15.b. Title: Director Public Works
- 15.c. Department: Public Works
- 15.d. Address: P O Box 1659
- 15.e. Phone number: 304-696-5903
- 15.f. Email address: hagleyd@cityofhuntington.com

Part II.C.b.1.

15.g. State your overall objective for this minimum control measure.

The City of Huntington’s objective for Public Education and Outreach is to create and implement a city-wide campaign which will provide various stakeholders with information regarding the impact of urban storm water runoff on water quality. Stakeholders include residents of the City and surrounding areas, business owners, students, developers and municipal employees. Education and Outreach will focus on the reduction of all potential pollutants and will emphasize reduction of aluminum, other metals and fecal coliform.

15.h. State and describe your BMPs. Indicate if BMP are part of your existing program.

BMP 1(a)	Storm water newsletter bill inserts		
Description	The “Every Drop Counts” newsletter will include storm water pollution prevention topics and be distributed to all utility customers which include residents and businesses.		
Measurable Goals	Print two newsletters per year which include storm water information. Distribute copies of each newsletter to all sewer customers through WV American Water. Include the following topics for articles: sources of stormwater pollution, impacts from leaking and failed septic and HAU systems, impervious surface, TMDL information, erosion and sediment control, illicit discharge impacts/reporting, ordinances/regulations related to stormwater pollution, and pet waste.		
Milestones	April 2012-2015 Publish educational information in Newsletter August 2013-2016 Publish educational information in Newsletter		
Is another entity involved in BMP implementation? Yes	If yes, describe West Virginia American Water billing	Part of an existing program? No	Related to TMDL? Yes

BMP 1(b)	Articles and Announcements		
Description	The local newspaper will include information about storm water pollution prevention, local training/workshops/events, and urban runoff. General information articles, “how to” articles, and notices of upcoming events will be provided in the local newspaper and on the storm water website.		
Measurable Goals	Submit information about local training/workshops/events to newspaper for publication. Submit articles on storm water topics to newspaper for publication.		
Milestones	March 2012 – Publish notice for public meeting discussing city storm water plan. March 2012-2015 Submit article on storm water topic for publication. March 2013-2016 Submit article on storm water topic for publication. Other submissions as appropriate for events, etc.		
Is another entity involved in BMP implementation? No	If yes, describe:	Part of an existing program? Yes	Related to TMDL? Yes

BMP 1(c)	Storm water Website and Facebook Page		
Description	Educational material, the SWMP, and annual reports will be posted on a website dedicated to the MS4 program. The number of hits to the website will be tracked. Visitors will be able to send comments and illicit discharge reports via the website. A public survey and pledge cards will be available for people to fill out for a chance to win a rain barrel. Topics will include: landscaping, rain water reuse, impacts of leaking and failing septic and HAU systems, BMPs for chemical storage, BMPs for carpet cleaning, BMPs for auto repair, runoff reduction and pet waste BMPs.		
Measurable Goals	Increase traffic to the storm water website through advertising on Utility Bill Inserts and in the newspaper. Track the number of hits to the website. Track number of “likes” for the Facebook page and number of people to join the page. Increase comments and reports of illicit discharges received via the website.		
Milestones	July 2012 Post SWMP on website link August 2012 Compile educational material for website January 2013 Post educational material on website and update, improve website March 2013 Start Facebook page and link to website March 2013 Post illicit discharge reporting information 2013-2016 Post Annual Report on website		
Is another entity involved in BMP implementation? No	If yes, describe:	Part of an existing program? Yes	Related to TMDL? Yes

BMP 1(d)	Public Meetings/Stormwater Committee (SWC) Meetings		
Description	The Stormwater committee is made up of city council members and all committee meetings are posted for public participation in the newspaper and on the city website. Public meetings are held to educate the public and solicit feedback on the following topics: sediment and erosion control, impacts of failing and leaky septic and HAU systems, BMPs for reducing metals and fecal coliform in runoff, local ordinances/regulations, technical standards, runoff reduction, storm water treatment and flow control BMPs, and general storm water education. SWC meetings are a key component of public participation for policy making and are held regularly.		
Measurable Goals	Hold at least two public meetings per year on various storm water topics. Increase attendance at meetings through advertising their topics, times, and locations.		

Milestones	March 2012 Hold public meeting and solicit feedback on the MS4 plan June 2012-June 2016 Hold public/committee meetings every four months on storm water topics.		
Is another entity involved in BMP implementation? No	If yes, describe:	Part of an existing program? yes	Related to TMDL? Yes

BMP 1(e)	Storm water Public Awareness Survey and Pledge Cards		
Description	A survey providing a sample of the community will be developed to gauge the effectiveness of public education and outreach and public involvement and participation BMPs. Pledge cards will be given to residents, landscapers, business owners and contractors to have them pledge to use BMPs We will offer the chance to win a rain barrel for each survey or pledge card completed.		
Measurable Goals	Show a trend of increase in stormwater knowledge, stormwater pollution prevention practices, and awareness of stormwater events over four years. Show a pledged increase in BMPs used by stakeholders through numbers of pledge cards signed.		
Milestones	March 2012 – Pledge cards developed, Develop a public awareness survey March - September 2012 Distribute the survey November 2012 Compile the survey results and utilize BMPs to target areas of low knowledge/awareness April 2013 Repeat the survey November 2013 Compile second survey results and compare the results of the two surveys Repeat at a later date		
Is another entity involved in BMP implementation? No	If yes, describe:	Part of an existing program? No	Related to TMDL? No

BMP 1(f)	Pet Waste Disposal Fact Sheet and Public Signage		
Description	A fact sheet and signage describing proper disposal of pet waste and the impact of improper disposal on water quality		
Measurable Goals	1,000 fact sheets will be distributed to pet owners and 50 signs will be posted publicly to encourage proper disposal of pet waste		
Milestones	April 2012-Fact Sheet developed, signs made May 2012-Method for fact sheet distribution developed and sign locations identified July 2012-Fact sheet distributed to pet owners through vet offices, pet stores, dog park, at local parks; signs posted at dog park, local parks, pet stores and vet offices		
Is another entity involved in BMP implementation? Yes	If yes, describe: The Park and recreation district has some of the stations on their property	Part of an existing program? Yes	Related to TMDL? Yes

BMP 1(g)	“Every Drop Counts” campaign		
Description	A city wide public awareness campaign will be implemented via local media and public demonstrations to educate civic orgs, schools, business orgs, city and county government and municipal employees about storm water runoff and its effect on water quality		
Measurable Goals	One public talk will be given each quarter and sign in sheets will track numbers of		

	<p>participants. One instructional video will be posted online each year focusing on implementing BMPs for storm water management focusing on residential practices such as rain garden installation, rain barrel use, downspout detachment, green rooftops, etc. It will be posted on the stormwater website. One radio or television interview will be broadcast each month focusing on a storm water issue. An educational booth will be set up at shows, schools, festivals, fairs and conventions, we will attend two each year and sign-up sheets will track number of participants. Contractor info on BMPs and ordinances will be handed out at city hall where they renew permits and pay fees.</p>		
Milestones	<p>March 2012 – Presentation information developed March 2012 – Radio and TV interviews begin March 2012 – Live presentations begin October 2012 – Instructional video added to web site</p>		
Is another entity involved in BMP implementation? No	If yes, describe:	Part of an existing program? Yes	Related to TMDL? Yes

BMP 1(h)	Septic Tank and HAU fact sheets		
Description	Septic Tank and HAU maintenance and leak detection fact sheets from the DEP website will be distributed at public events and through the Cabell Huntington Health Department sanitarians.		
Measurable Goals	Number of fact sheets distributed at public events and by sanitarians will be documented		
Milestones	May 2012 – DEP fact sheet reproduced and begin distribution Ongoing		
Is another entity involved in BMP implementation? Yes	If yes, describe: Cabell Huntington Health Department Sanitarians	Part of an existing program? No	Related to TMDL? Yes

Other applicable BMPs:

- 2(e)Community Cleanup Events
- 2(c)Public Events
- Fourpole Creek Watershed Association meetings
- 2(f) Volunteer Trainings
- 2(a)School Age Youth Activities
- 3(e) Household Hazardous Waste Disposal/Recycling
- 4(d) Construction Site Training Workshops
- 6(d)Municipal Training

15.i. Is another entity sharing responsibility for the BMP? If so, who? See tables above.

MCM Components

Part II.C.b.1.a.i

15.j. Describe your education and outreach strategy targeting the general public.

The message that “Every Drop Counts” is one that applies to many avenues of water quality assurance: 1- Every drop of water is important to our continued survival 2- Every drop of pollution degrades the water quality, no matter how small 3- Every drop of public participation in reducing pollution helps increase water quality, no matter how small. This is the message that we will be getting out to the public through various avenues, including: television, radio, print, point of practice reminders, social networking and the internet. Our goal is to educate identified stakeholders in the BMPs which are applicable to them in their daily lives. Our mission is to help every citizen realize that they are personally negatively affected by the stormwater runoff and pollution problems within the city. We want to follow that realization with education on BMPs which are easy to implement and cost effective which will help solve the problems. We want to empower our citizens to make small changes in their daily habits which will help create increased water quality throughout the region.

Part II.C.a.ii

15.k. Describe your education and outreach strategy targeting businesses including home-based and mobile businesses.

As a part of the general “Every Drop Counts” campaign, we will target local businesses through giving public talks at business organization meetings, such as the Chamber of Commerce, Downtown Partners,

Union organizations and business oriented radio talk shows, etc. At these talks we will focus on how using BMPs in their businesses can help reduce costs and increase business through “going green”. Information will be posted and given to them at city hall where all businesses go to pay scheduled fees and obtain licensure. As well, the planning and permit department will give out information in their offices

Part II.C.b.1.a.iii.

15.l. Describe your education and outreach strategy targeting homeowners, landscapers, and property managers.

We will set up a demo booth at highly attended shows, trade conventions, fairs and festivals. Here we will engage residents, landscapers and property managers in filling out surveys and pledge cards. Our media outreach and public talks will also reach each of these stakeholders. The educational materials used will be those found at the EPA website and will be targeted to the audiences we are reaching out to at each event. The information will be specific to the needs of the audience based on EPA outlined BMPs. Information will be posted and given to them at city hall where the public goes to pay scheduled fees and obtain licensure. As well, the planning and permit department will give out information in their offices.

Part II.C.b.1.a.iv

15.m. Describe your education and outreach strategy targeting engineers, contractors, developers, review staff, and land use planners.

The City of Huntington is working to update ordinances and technical standards to comply with MCM 5. Announcements of new ordinances are posted in the newspaper and at city hall. Educational materials, trainings and meetings will be utilized to educate engineers, contractors, developers, review staff, and land use planners on the new requirements and will emphasize the importance of using BMPs to improve stormwater quality and reduce runoff volume. This audience will also be reached through public talks at trade functions and media outlets. Information will be posted and given to them at city hall where contractors go to pay scheduled fees and obtain licensure. As well, the planning and permit department will give out information in their offices.

Schedule

Part II.C.a.1

15.n. Provide a schedule for implementing each component, including dates for interim and full implementation.

BMP	Initiation of BMP	Interim Date	Full Implementation
1(a) Stormwater Newsletter bill inserts	August 2012	ongoing	Ongoing
1(b) Articles and Announcements	ongoing	ongoing	Ongoing
1(c) Stormwater Webpage	July 2012 Post SWMP on webpage link	January 2013 post educational information March 2013 start Facebook page & Illicit Discharge reporting info	July 2013 post annual report, continue to post updates
1(d) Public	ongoing	ongoing	Ongoing

Meetings/Stormwater Committee Meetings			
1(e) Stormwater Public Awareness Survey and Pledge cards	March 2012 – Pledge cards developed, Develop a public awareness survey	March - September 2012 Distribute the survey November 2012 Compile the survey results and utilize BMPs to target areas of low knowledge/awareness Pledge cards signed at all public events and online	April 2013 Repeat the survey November 2013 Compile second survey results and compare the results of the two surveys Pledge cards ongoing
1(f) Pet Waste Fact Sheet and Signage	ongoing	May 2012 Method for distribution developed	July 2012 Fact sheet distributed
1(g) Every Drop Counts Campaign	March 2012 – Presentation information developed March 2012 – Demonstration rain barrel unit, banner and educational set up will be built for set up at shows, schools, festivals and conventions March 2012 – Radio and TV interviews begin March 2012 – Monthly live presentations begin	October 2012 – First instructional video added to web page	Ongoing through 2013
1(h) Septic Tank Fact Sheet	April 2012 – download fact sheet	July 2012 – Distribute to sanitarians	Ongoing

Measurable Goals

Part II.B.4

15.o. List and fully describe your Measurable goal(s) for this MCM.

BMP	Measurable Goal	Description
1(a) Stormwater Newsletter bill inserts	Print two newsletters per year which include stormwater information. Distribute copies of each newsletter. Include the following topics for articles: sources of stormwater pollution, impacts from impervious surface, impacts from leaking and failing septic and HAU systems, TMDL information, erosion and sediment control, illicit discharge impacts/reporting, ordinances/regulations related to stormwater pollution, and pet waste.	The City will publish the newsletter and will write articles applicable to the SWMP public education goals. The newsletter will be mailed with utility bills and handed out at the bill payment window in an attempt to reach all sanitary board customers.

1(b) Articles and Announcements	Submit information about local training/workshops/events to newspaper for publication.	When a relevant training event, workshop, or other event is held by the City of Huntington, it will be advertised in advance in the local newspaper and on the stormwater web page.
	Submit articles on stormwater topics to newspaper for publication.	Articles applicable to SWMP education goals will be submitted to the local paper and put on the stormwater website.
1(c) Stormwater Webpage	Increase traffic to the stormwater webpage through advertising on Utility Bill Inserts and in news media. Track the number of hits to the website.	The stormwater web address will be advertised on utility bills and/or the newsletter as well as at all public events and in the news media. Hits to the website will be tracked.
	Increase comments and reports of illicit discharges received via the web link.	The web link will include an opportunity for visitors to comment on the stormwater program and report illicit discharges. The resolution of comments and reports will be tracked.
1(d) Public Meetings and Stormwater Committee meetings	Hold two public meetings per year on various stormwater topics.	Public meetings will be advertised in advance and include sign-in sheets or head counts to track attendance.
	Increase attendance at meetings through advertising their topics, times, and locations.	
1(e) Stormwater Survey	Show an increase in stormwater knowledge, stormwater pollution prevention practices, and awareness of stormwater events over four years.	Stormwater surveys will be graded according to their correct responses to knowledge of stormwater issues, implementation of stormwater pollution prevention practices, and positive responses to involvement/participation
1(f) Pet Waste Fact Sheet	A fact sheet will be distributed to pet owners to encourage proper disposal of pet waste	The City will develop a pet waste disposal fact sheet and a method for distributing the fact sheet to pet owners in 2012 to encourage the proper disposal of pet waste.
1(g) Every Drop Counts Campaign	Show an increase in sign in sheets signed, counter numbers recorded at events and educational materials distributed.	The city staff will perform public talks and demonstrations at two highly attended public events each year, counters will be used to track numbers of people participating in the demo or educational table, will give one talk to organizations each month, will give at least one TV or radio interview each month and will distribute educational materials from the EPA website.
1 (h) Septic Tank Fact Sheet	2,000 sheets distributed, numbers of fact sheets distributed by city, by sanitarians	The City will use the DEP fact sheet on maintenance and inspection of septic and Home Aeration Unit systems

Tracking

Part II.C.b.1.c.

15.p. Describe your plan to track the activities associated with this MCM.

The following items will be filed at the Public Works office to track activities:

- All educational materials distributed
- Copies of articles published, newsletter and pledge cards
- Sign in sheets/head counts for all events and counter numbers for all events
- Any feedback or direct communication from the public

- Copies of all educational materials posted on the webpage
- Copies of surveys

Evaluation

Part II.B.7 & Part II.C.b.1.b.

15.q. Explain how you plan to gauge the effectiveness of your public education and outreach efforts.

Measureable goals will be used to evaluate the effectiveness of the public education and outreach efforts. In addition, the stormwater survey, will be used to identify gaps in stormwater knowledge, implementation of BMPs by respondents, and interest in participation in public involvement and participation opportunities. Measure trends in interest in pledge cards and answers on surveys.

Public Involvement and Participation – MCM #2

Part II.C.b.2.

Responsible Person:

Identify the responsible person(s) for implementing this MCM. There may be more than one person or different departments responsible for various projects. If so, discuss.

- 16.a. Name: David Hagley, P E
- 16.b. Title: Director
- 16.c. Department: Public Works
- 16.d. Address: P O Box 1659 Huntington, WV 25717
- 16.e. Phone number: 304-696-5903
- 16.f. Email address: hagleyd@cityofhuntington.com

16.g. State your overall objective for this minimum control measure.

The City of Huntington’s objective for Public Involvement and Participation MCM is to direct our resources towards providing opportunities for various stakeholders to provide input and to participate in the City’s stormwater management program. Identified stakeholders include; residents of the City of Huntington and surrounding areas, business owners, school students, developers and municipal employees.

16.h. State and describe your BMPs. Indicate if the BMP is part of the existing program.

BMP 2(a)	Projects with school students age 6-18		
Description	The WV Conservation Agency and several local schools are working with the City to promote stormwater education within the elementary, middle and high schools		
Measurable Goals	At least two stormwater public involvement activities will be implemented with children age 6-18 each year		
Milestones	2012 – Storm Drain Stencil design project and Water conservation project implemented at local schools 2013-Develop ongoing projects for school aged youth		
Is another entity	If yes, describe:	Part of an existing	Related to TMDL?

involved in BMP implementation? Yes	West Virginia Conservation Agency	program? No	No
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BMP 2(b)	Participation in Fourpole Creek Watershed Association		
Description	The City of Huntington participates in regular meetings with the FCWA to develop and implement the Fourpole Creek Watershed Plan.		
Measurable Goals	Number of meetings held and attendees will be recorded.		
Milestones	June 2012- Draft Fourpole Creek Watershed Plan will begin to be developed June 2014 -Fourpole Creek Watershed Plan completed, implementation begins		
Is another entity involved in BMP implementation? Yes	If yes, describe: FCWA	Part of an existing program? Yes	Related to TMDL? Yes

BMP 2(c)	Public Events		
Description	This is an excellent opportunity for the Fourpole Creek Watershed Association to solicit additional members and volunteers for upcoming projects, like building rain gardens, creek clean ups, non-native plant pulls, etc. Rainbarrel demonstrations will be given and storm water information will be distributed at each event.		
Measurable Goals	Number of volunteers, attendees, and materials distributed		
Milestones	2012 – The City will look at ways to expand their involvement in the events		
Is another entity involved in BMP implementation? Yes	If yes, describe: FCWA, WV Conservation Agency	Part of an existing program? Yes	Related to TMDL? No

BMP 2(d)	Stormdrain Marking Projects		
Description	Over 50 storm drains in the Fourpole Creek Watershed will be marked with “No dumping drains to stream” storm drain markers.		
Measurable Goals	The maintenance of the markers and the locations of illicit discharges will be tracked		
Milestones	2012 – 2013 storm drains marked by volunteers		
Is another entity involved in BMP implementation? Yes	If yes, describe: FCWA	Part of an existing program? Yes	Related to TMDL? No

BMP 2(e)	Community Cleanup events		
Description	The Southside Neighborhood Association holds an annual Fourpole Creek Community Cleanup event and the City participated in an Ohio River Cleanup event and city wide clean up events each year.		
Measurable Goals	Sign up sheets and counters will be used to track volunteers at each event, amount of trash removed at events will be recorded		
Milestones	2011 – Over 125 volunteers came to work the Fourpole Creek event, over two tons of trash was removed from the creek 2012 – At least one clean up event will be held every year		

Is another entity involved in BMP implementation? Yes	If yes, describe: FCWA	Part of an existing program? Yes	Related to TMDL? No
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BMP 2(f)	Volunteer Training		
Description	Volunteers from Marshall University, the FCWA and other citizens will be trained by professionals in the field on water sampling, outfall inspections, mapping of drains, outfalls and structural BMPs. They will be tested by filling out a post-training survey to prove their knowledge of the protocols. The volunteers will go out the first time with a trained, experienced person to make sure that they follow proper protocol. They will be spot checked for accuracy.		
Measurable Goals	The numbers of volunteers trained and the numbers of objects mapped, outfalls inspected and samples taken will be tracked and documented.		
Milestones	2012 – First training will occur Trainings will occur at least once per year ongoing.		
Is another entity involved in BMP implementation? Yes	If yes, describe: FCWA, Marshall University	Part of an existing program? No	Related to TMDL? Yes

Refer to additional BMPs which fall under multiple MCMs:

- Public Meetings/Stormwater Committee Meetings
- Stormwater Public Awareness Survey/ Pledge Cards
- Household Hazardous Waste Disposal/Recycling
- Construction Site Training Workshops
- Municipal Training

16.i. Is another entity sharing responsibility for the BMP? If so, who?
Refer to BMP tables above.

MCM Components

Part II.C.b.2.

16.j. Describe at least two methods you plan to use to engage the public in your SWMP.

Public meetings- Public meetings will be advertised in advance and held to solicit feedback on the development of the SWMP, ordinance and policy changes, and other topics.

Stormwater survey-The stormwater survey will be distributed to all utility customers and used to solicit feedback on stormwater practices, interest in public involvement, and concerns members of the community may have.

Community clean up events – the community is encouraged to participate in annual cleanup events for Fourpole Creek, the Ohio River banks and the City of Huntington

Encourage volunteers to help with rain barrel demonstrations and education tables at public events.

Encourage volunteers from FPWA, Marshall University and citizen volunteers to train in proper sampling and inspection method and to aid in sampling, mapping and inspections.

Encourage volunteers to help install rain gardens, riparian vegetation, and rain barrels as appropriate.

16.k. Describe how you will accommodate public participation in the decision making process for your SWMP.

Members of the public will be given the opportunity to comment on the draft SWMP at an advertised public meeting or by contacting the City directly. The public meeting and availability of the draft SWMP will be advertised in the local paper and on the city website.

Part II.C.b.2.b

16.l. Describe your communication process for notifying groups of opportunities to become involved in stormwater activities in your watershed(s).

Public notices will be published in the Herald Dispatch, advertised through word of mouth, news media, Facebook and distributed through e mail to members of the Fourpole Creek Watershed Association, pledge members, and attendees of workshops. The city website will also list events and opportunities to be involved.

Part II.C.b.2.c

16.m. List the URL of your *Stormwater* website.

www.cityofhuntington.com go to “Government” tab and then to “stormwater information” tab

Schedule

Part II.C.a.1

16.n. Provide a timeline of implementation of each component of your program for this MCM, including dates for interim and full implementation.

BMP	Initiation of BMP	Interim Date	Full Implementation
2(a) Projects with school students	2012 – Four projects slated for this year	Ongoing	Ongoing
2(b) Participation in Fourpole Creek Watershed Association	Ongoing	June 2012- Fourpole Creek Watershed Plan begins to be developed	Following DEP approval of Watershed Plan
2(c) Public Events	Ongoing	Ongoing	Ongoing
2(d) Stormdrain marking projects	Begins Summer 2012	Ongoing	Ongoing
2(e) Community Clean up	Ongoing	Ongoing	Ongoing

events			
2 (f) Volunteer training	April 2012 – First volunteer training	Ongoing	Ongoing

Measurable Goals

Part IV.A. & Part II.B.4

16.o. List and fully describe your measurable goal(s) for this MCM.

BMP	Measurable Goal	Description
2(a) Projects with school students	Number of students involved will be recorded Number s of and type of project will be recorded	The WV Conservation Agency and the city of Huntington will work with school age youth on projects which involve increasing water quality and education.
2(b) Participation in Fourpole Creek Watershed Association	Number of meetings held and attendees will be recorded. Number of volunteers who participate in events will be recorded.	The Fourpole Creek Watershed Association meets regularly to solicit input on the development and implementation of the Fourpole Creek Watershed Plan, including monitoring, education/participation opportunities, and other issues.
2(c) Public Events	Number of volunteers, attendees, and materials distributed. Number of surveys and pledge cards filled out.	Several highly attended events are held yearly on Earth day, Conservation Day and in March, a Home and Garden show is held at the civic center. We will give rain barrel demonstrations, do a public presentation on storm water, distribute educational materials and get people to fill out surveys and pledge cards at each event. This is an excellent opportunity for the association to solicit additional members and volunteers for upcoming projects
2(d) Stormdrain marking projects	The number of markers and the locations of illicit discharges will be tracked	Volunteers will mark storm drains with messages telling the public not to dump trash into the drains because it leads to a stream. This volunteer effort should prevent illicit discharges from dumping into storm drains.
2(e) Community Cleanup Events	The number of volunteers will be recorded and the amount of trash removed from the cleanup sites will be recorded.	Volunteers will participate in at least one annual cleanup event for the Fourpole Creek, the Ohio Riverbank or the City of Huntington’s downtown area. The cleanup will reduce the amount of trash and other materials in the waters.
2 (f) Volunteer training	The number of volunteers trained will be recorded through sign in/ sign out sheets and certification surveys filled out. The numbers of samples taken, areas and objects mapped and inspections performed will be documented	Volunteers will be trained at least once per year by area professionals. They will be trained in proper protocol for water sampling, mapping outfalls, storm drains & structural BMPs and performing inspections. They will take post-training surveys which will prove their knowledge of the protocols. This will help fulfill our mapping, inspection and sampling requirements at little cost to the stormwater budget.

Tracking

Part II.B.7.

16.p. Describe your plan for tracking activities associated with this MCM.

The following items will be filed at the Public Works office to track activities.

- Sign in sheets, pledge cards, surveys, counter numbers from all meetings, workshops, presentations, trainings, events and demonstrations
- Feedback, in the form of emails, calls, and direct communication to the City concerning stormwater issues

Evaluation

Part II.B.7

16.q. Explain how you plan to gauge the effectiveness of your Public Involvement and Participation program.

Measureable goals will be used to evaluate the effectiveness of the public involvement efforts. In addition, the stormwater survey, will be used to identify gaps in stormwater knowledge, implementation of BMPs by respondents, and interest in participation in public involvement and participation opportunities.

Illicit Discharge Detection and Elimination – MCM #3

Part II.C.b.3.

Responsible Person

Identify the responsible person(s) for implementing this MCM. If there is more than one person or department responsible for implementation of this MCM, please discuss.

- 17.a. Name: David Hagley, P E
- 17.b. Title: Public Works Director
- 17.c. Department: Public Works
- 17.d. Address: P O Box 1659 Huntington, WV 25717
- 17.e. Phone number: 304-696-5903
- 17.f. Email address: hagleyd@cityofhuntington.com
- 17.g. Is another entity sharing responsibility for the MCM? If so, who?

Control Objective & BMPs

17.h. State your overall objective for this MCM.

The city of Huntington’s objective for the Illicit Discharge Detection and Elimination MCM is to build on BMPs initiated in the previous SWMP and further direct our resources towards detecting and eliminating illicit discharges to the storm sewer system; including the reduction of fecal coliform from inflow and infiltration, leaking sanitary sewers, and failing septic systems.

17.i. State and describe your BMPs. Indicate if any BMPs are part of your existing program.

BMP 3(a)	Storm Sewer Mapping
Description	Field reconnaissance and GPS will be used to map the MS4 system. Mapping will be utilized to target areas for illicit discharge investigations, target land use for educational campaigns, and to track potential illicit discharges and spills.
Measurable Goals	Complete mapping of MS4 system by 2016
Milestones	Mapping of MS4 system initiated August 2014-Complete outfall mapping

	August 2016-Complete current storm sewer mapping Ongoing – Continue to update mapping		
Is another entity involved in BMP implementation? Yes	If yes, describe: FCWA and Marshall University students will be trained to do the mapping.	Part of an existing program? Yes	Related to TMDL? Yes

BMP 3(b)	Illicit Discharge Ordinance		
Description	The IDDE Ordinance was drafted to prohibit illicit connections and non-stormwater discharges to the MS4 system.		
Measurable Goals	Violations and enforcement actions will be tracked.		
Milestones	November 8, 2010-IDDE Ordinance Adopted April 2012-IDDE Ordinance Reviewed for compliance with 2009 NPDES General Permit July 2012-Review of the updated IDDE Ordinance by the SWC December 2013-Adoption of updated IDDE Ordinance		
Is another entity involved in BMP implementation? No	If yes, describe:	Part of an existing program? Yes	Related to TMDL? Yes

BMP 3(c)	Stormwater Field Assessments		
Description	Outfall inspections will be conducted using the procedures and outfall reconnaissance sheet from the Center for Watershed Protection (CWP).		
Measurable Goals	Field assessments and the identification and tracking of illicit discharges will be tracked.		
Milestones	July 2012-Develop materials for field assessments August 2012-Develop materials for tracking of illicit discharges Fall 2012-Train staff and volunteers on conducting field investigations 2013-Develop a schedule for completing field assessments and begin annual field assessments of all receiving waters		
Is another entity involved in BMP implementation? Yes	If yes, describe: West Virginia Conservation Agency and MU professors will help with training and Marshall University students and FCWA will volunteer to help	Part of an existing program? Yes	Related to TMDL? Yes

BMP 3(d)	Illicit Discharge Report Section of web page and anonymous tip hotline		
Description	Members of the public are encouraged to report spills and illicit discharges to the web page, or on our anonymous tip hotline which will be advertised on the stormwater website and through other media (bill inserts, newspaper articles, etc.). The public works director or assigned staff responds to reports and follows SOPs to trace the source of the discharge and take action to eliminate the discharge.		
Measurable Goals	Record all reports received and their resolution on tracking forms, assess trends in reporting to measure education/awareness effectiveness		
Milestones	2012-Develop a form to record calls/reports and resolutions 2013 – assess trends in reporting		
Is another entity involved in BMP implementation? No	If yes, describe:	Part of an existing program? Yes	Related to TMDL? Yes

BMP 3(e)	Household Hazardous Waste Disposal/Recycling		
Description	Investigate options for members of the community to dispose of or recycle household		

	hazardous waste and produce educational literature to prevent the dumping and improper disposal of these materials. Post those on the web page and Facebook page		
Measurable Goals	Track demand for household hazardous waste disposal/recycling through illicit discharge reports and stormwater field assessments Distribute educational materials related to proper disposal of household hazardous waste to all utility customers, post on web page and on Facebook page		
Milestones	August 2012-Investigate options for hazardous waste disposal/recycling in the area December 2012-Develop educational materials and/or web page content 2013-Investigate funding options for disposal events and meet with local solid waste authority to plan future events		
Is another entity involved in BMP implementation? No	If yes, describe:	Part of an existing program? No	Related to TMDL? No

Refer to additional BMPs which also fall under MCM 3:

- 1(a) Stormwater bill inserts
- 1(c) Stormwater Web page and Facebook page
- 1(b) Articles and Announcements
- 1(d) Public Meetings
- 1(g) "Every drop counts" Public Events
- 6(c) Municipal Stormwater Training
- 4(d) Construction Site Training
- Participation in Fourpole Creek Watershed Association
- 2(d) Stormdrain Marking Projects
- 2(f) Volunteer training
- 3(e) Household Hazardous Waste Disposal/Recycling
- 2(e) Community Cleanup Events

MCM Components

Part II.C.b.3.a.

17.j. Do you have a current map of your municipal storm sewer system?

Yes, the city has mapped miles of the storm sewer in a GIS database. Outfall mapping has been completed for portions of Fourpole Creek. The city of Huntington is planning to partner with volunteers from Marshall University and the Fourpole Creek Watershed Association to train them on mapping the rest of the system (approximately 80% needs to be completed) and improving the detail of our existing mapping. We will be updating our maps annually. The current maps are available on the web page.

Part II.C.b.3.ai

17.k. All known storm sewer outfalls? No

We have mapped approximately 20% of our outfalls on Fourpole Creek and plan to map the remaining outfalls, including field inspections, by summer of 2017.

17.l. Receiving waters? Map components include receiving waters.

17.m. Structural BMP's owned, operated or maintained by the permittee? We currently have rip rap, concrete walls, degrading concrete slabs, gabion baskets and strategically placed boulders. We are working

on a plan to include more structural BMPs owned by the City of Huntington, as they are a part of our SEP agreement. These will be represented on the maps by the summer of 2015.

- 17.n. The location and type of all other stormwater conveyances located within the boundaries of the permittees MS4 watershed? We plan to include all other stormwater conveyances.
- 17.o. Updating the known connections to the municipal separate storm sewer authorized after July 22, 2009? We plan to include known connections to the municipal separate storm sewer authorized after July 22, 2009 in the completed mapping.
- 17.p. Geographic areas that discharge stormwater into the permittees MS4, which may not be located within the municipal boundary? We plan to include the geographic area that discharges stormwater into the MS4 in the completed mapping.

Part II.C.b.3.b.

17.q. Do you have an IDDE Ordinance?

Yes

Part II.C.b.3.b.

17.r. Describe your Ordinance review and update procedure, including milestones of IDDE Ordinance review.

IDDE Ordinance Adopted	November 8, 2010
IDDE Ordinance Reviewed for compliance with 2009 NPDES General Permit	April 2012
Review of the updated IDDE Ordinance draft by the SWC	July 2012
Adoption of updated IDDE Ordinance	December 2013

Does your IDDE Ordinance prohibit the following:

Part II.C.b.3.ii

17.s. Discharges from hyperchlorinated water line flushing? Yes or No. If not, how are these discharges handled when they occur?

No. An update to the ordinance specifically prohibiting discharges from hyperchlorinated water line flushing will be considered in upcoming revisions to the IDDE Ordinance. As well, we will address this in public education and outreach activities through use of fact sheets, articles and utility bill insert topics.

17.t. Lawn watering and other irrigation runoff? Yes or No. If not, have you addressed lawn watering in your public education and outreach activities?

No. Lawn watering and irrigation runoff have not been a concern for illicit discharges, but will be addressed in public education and outreach activities.

17.u. Street, parking lot, and sidewalk wash water, and external building wash down? Yes or No. If not, have you addressed these types of runoff in your public education and outreach activities?

No, we will address these types of runoff in our public outreach and education activities

Part II.C.b.3.b.v.

17.v. Does your IDDE Ordinance include escalating enforcement procedures and actions?

A warning citation is given and if the problem is not corrected immediately, we give a \$500 fine and each day that the problem goes on can be charged as a separate offense.

Part II.C.b.3.b.v.

17.w. Briefly describe your enforcement strategy.

Reactionary based on reported illicit discharges; Chief Building inspector, code enforcement technician, compliance officer are responsible for enforcement. Plumbing and Electrical inspectors could enforce if

necessary. A notice is given to the person committing the violation. If, after reasonable notice, the person fails to comply with the IDDE Ordinance, they will be charged a \$500 fine and forced to make the repairs necessary for compliance.

Tip: The IDDE Ordinance shall be reviewed on an annual basis. The Ordinance shall be reviewed to ensure that it contains the necessary required information that the 2009 small MS4 general permit requires.

Your Ordinance is required to prohibit and eliminate non stormwater discharges, illegal discharges, and/or dumping into the storm sewer system, and any necessary procedures for evaluation, assessment, investigation and enforcement to prevent polluted stormwater discharges from entering local streams, lakes or rivers. Except for newly permitted entities, MS4's should already have this Ordinance in place.

Part II.C.b.3.c .

17.x. Describe your field assessment activities, including how many assessments you plan to conduct each year.

The city plans to train volunteers and staff to conduct inspections of outfalls and structural BMPs by 2013 and also complete outfall and structural BMP mapping by 2017. Upon completion of these activities, the city will prioritize outfalls for inspection and create a plan for inspecting outfalls and BMPs over the next four years.

Part II.C.b.3.c.i.

17.y. Describe how you will locate “priority areas”.

Priority areas will be those with historic illicit discharges and those in densely developed areas. This will be based on local knowledge, reports to the web page and anonymous tip hotline, and the results of outfall reconnaissance. A land use map will be utilized to target businesses considered to be priority areas.

Part II.C.b.3.c .iii

17.z. Describe your procedures for characterization of illicit discharges.

An outfall reconnaissance sheet from the Center for Watershed Protection (CWP) will be utilized by the city for outfall inspections. Visual parameters recorded on the sheets are color, turbidity, floatables, deposits/stains, abnormal vegetation, poor pool quality, and pipe benthic growth. The city will have an independent lab test samples for fecal coliform, ammonium, nitrates, total suspended solids (TSS), conductivity, dissolved oxygen (DO), biochemical oxygen demand (BOD), temperature, and pH to characterize illicit discharges, as needed.

Part II.C.b.3.c .iv

17.aa. Describe your procedures for tracing the source of the discharge.

An illicit discharge investigation form will be developed and training for staff and volunteers involved in illicit discharge detection and outfall reconnaissance will be conducted so that staff and volunteers can investigate upstream activity to determine the source of illicit discharges. The CWP Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments will be used to investigate non-stormwater entries into storm drainage systems.

Part II.C.b.3.c.v

17.bb. Describe your procedures for removing the source of the discharge.

Clean up illegal dumping sites, cap off pipes or have them removed by the owner, flush the lines on combined lines, sand bag, straw berms/dams or other BMPs for correcting problem.

Enforcement will be according to the illicit discharge ordinance. Notice is given to the person committing the violation. If, after reasonable notice, the person fails to comply with the IDDE Ordinance, they will be fined \$500 and required to repair the problem.

C.b.3.d.

17.cc. Describe how you will inform public employees, businesses and the general public of hazards associated with illegal discharges and improper disposal of waste.

Municipal employees involved in tasks that could impact stormwater will be trained. Training will include facility walkthroughs of all municipally owned facilities with their department heads and meetings with all municipal employees involved in tasks that could impact stormwater including Stormwater Pollution Prevention Powerpoint Presentations and the distribution of appropriate literature.

Businesses and the general public will receive educational materials on illegal discharges and improper disposal of wastes through the newsletter and the stormwater web page and Facebook page. The web page report link will be advertised for the reporting of spills and other illicit discharges. Information will be offered through utility bill inserts and educational materials handed out at city hall to businesses.

Part II.C.b.3.f.

17.dd. Describe your plan to training your staff on the identification and reporting of illicit discharges.

Include the number of training sessions planned for each year.

Municipal employees involved in tasks that could impact stormwater will be trained. Stormwater Pollution Prevention PowerPoint Presentations and literature distributed at training events will include pictures and descriptions to train employees to identify potential illicit discharges and report them to field assessment staff. We plan to have monthly stormwater training in conjunction with monthly safety training for the streets department. We will have trainings once per year for other facilities not under their own permit. Staff and volunteers specifically involved in field assessment and field collection of outfall locations will be trained on the use of a field reconnaissance inventory sheet and tracing the source of the discharge.

Schedule

Part II.C.a.1

17.ee. Describe how and when you will implement each component of program, including dates for interim and full implementation.

BMP	Initiation of BMP	Interim Date	Full Implementation
3(a) Storm Sewer Mapping	Ongoing-begin mapping	July 2017-complete mapping of MS4 system	Ongoing-Continue to update mapping
3(b) Illicit Discharge Ordinance	Nov 8, 2010-adoption of ordinance	April 2012-Review ordinance	December 2013-Adoption of updated ordinance (annual reviews ongoing)
3(c) Stormwater Field Assessments	2012-materials will be developed for field assessments	2013-Develop schedule for annual field assessments	2017-Complete inspections of all outfalls and continue annual assessment schedule
3(d) Illicit Discharge Reporting on web page and anonymous tip hotline	2012 - Develop tracking form and train staff and volunteers on responding	2013 - Establish and publicize web page reporting	Ongoing - Continue to track and respond to reports

	to reports		
3(e) Household Hazardous Waste Disposal/Recycling	2011- Investigate options for hazardous waste disposal/recycling in the area	2012-Develop educational materials and/or webpage content	2012-Investigate funding options for future events and meet with local solid waste authority to plan future events

Measurable Goals

Part II.B.4

17.ff. List and fully describe your Measurable goal(s) for this MCM:

BMP	Measurable Goal	Description
3(a) Storm Sewer Mapping	Complete mapping of MS4 system by 2015 and conduct annual updates	Mapping will be updated annually in a GIS database through GPS and field investigation efforts and be available upon request from DEP.
3(b) Illicit Discharge Ordinance	Violations and enforcement actions will be tracked.	A tracking form will be developed and applicable staff will be trained on responding to illicit discharges found during field assessments and reported to the illicit discharge report link. These forms will be kept on file and reviewed periodically for trends in types and locations of illicit discharges. The ordinance will be updated if necessary to include more specific information or additional enforcement measures.
3(c) Stormwater Field Assessments	Field assessments and the identification and tracking of illicit discharges will be tracked.	A tracking form will be developed and applicable staff will be trained on responding to illicit discharges found during field assessments and reported to the illicit discharge report hotline. These forms will be kept on file and reviewed periodically for trends in types and locations of illicit discharges.
3(d) Illicit Discharge Reporting on web page and anonymous tip hotline	Record all reports received and their resolution on tracking forms	A tracking form will be developed and applicable staff will be trained on responding to illicit discharges found during field assessments and reported to the illicit discharge report web link. These forms will be kept on file and reviewed periodically for trends in types and locations of illicit discharges. The web page and hotline will be advertised to increase awareness and reporting of illicit discharges.
3(e) Household Hazardous Waste Disposal/Recycling	Track demand for household hazardous waste disposal/recycling through illicit discharge reports and stormwater field assessments	The demand for disposal options and information will be monitored through inquiries to the utility and the solid waste authority on disposal options and incidences of illegal dumping.
	Distribute educational materials related to proper disposal of household hazardous waste to all utility customers through utility inserts	Literature and website content will be developed on the proper disposal of household hazardous waste and distributed to all utility customers via bill inserts and on the stormwater webpage.
	Keep meeting minutes related to this BMP Track funding sources related to this BMP.	The city of Huntington will meet with the local solid waste authority and other interested groups to develop options for household hazardous waste disposal in the area. Meeting minutes will be kept to track the progress of these meetings and obtain information about funding sources for future collection events.

Tracking:

Part II.C.b.3.d.ii & Part II.C.b.3.e.

17.gg. Describe your procedures for tracking activities related to each component of this MCM.

The following items will be filed at the Public Works office to track activities.

- Copies of all literature distributed
- Copies of all information put on the stormwater webpage
- Clippings of all newspaper articles/announcements related to the SWMP
- Sign in sheets and minutes from all meetings
- Feedback, in the form of emails, calls, and direct communication to the City of Huntington
- Current mapping of the MS4 system
- Records of violations and enforcement actions
- Field assessment tracking sheets
- Illicit discharge tracking sheets
- Records of reports received from the illicit discharge web link and their resolution

Evaluation

Part II.B.7

17.hh. Fully explain how you plan to gauge the effectiveness of your IDDE program.

Measurable goals will be used to evaluate the effectiveness of the IDDE program. Through field investigations (both scheduled and derived from reports), sources of illicit discharges in the community will be identified. Enforcement actions and educational campaigns will then be implemented to remove sources of illicit discharges. In addition, the stormwater survey, will be used to identify gaps in stormwater knowledge and implementation of BMPs related to illicit discharges.

Construction Site Run-off Control – MCM #4

Part II.C.b.4.

Responsible Person:

Identify the responsible person(s) for implementing this MCM. There may be more than one person or different departments responsible for various projects. If so, discuss.

- 18.a. Name: David Hagley P E
18.b. Title: Director
18.c. Department: Public Works
18.d. Address: P O Box 1659 Huntington, WV 25717-1659
18.e. Phone number: 304-696-5903
18.f. Email address: hagleyd@cityofhuntington.com

18.g. Is another entity sharing responsibility for this MCM? If so, who?

Control Objective & BMPs

18.h. State your overall objective for this minimum control measure.

The City of Huntington's objective for the Construction Run-off Control MCM is to build on BMPs already initiated and to further direct resources towards reducing the amount of erosion and sedimentation in stormwater runoff from construction site activities; including reducing the amount of erosion and sedimentation and the associated aluminum and other metals in runoff from construction activities.

18.i. State and describe your BMPs. Indicate which BMPs are part of your existing program.

BMP 4(a)	Construction Site Ordinance – Article 970, Erosion and Sediment Control		
Description	Construction Site Requirements for Erosion and Sediment Control were passed by City Council on December 27, 2010. Those regulations define a permitting system for land disturbance activities, plan submission requirements, review, and inspection and enforcement procedures.		
Measurable Goals	The ordinance will be reviewed annually for compliance with stormwater regulations and to make sure it is meeting the needs of the community.		
Milestones	December 27, 2010-Construction Site Requirements for Erosion and Sediment Control Ordinance passed, requiring preconstruction meeting March 19, 2012 – Ordinance reviewed for compliance Ongoing annual reviews		
Is another entity involved in BMP implementation? No	If yes, describe:	Part of an existing program? Yes	Related to TMDL? Yes

BMP 4(b)	Construction Site Plan Review		
Description	Sites with land disturbance over 5,000 square feet must submit a sediment and erosion control plan for review by the Planner and/or Building Inspector and/or Public Works Director.		
Measurable Goals	All applicable construction sites will have erosion and sediment control plans approved prior to issuance of permit for construction.		
Milestones			
Is another entity involved in BMP implementation? No	If yes, describe:	Part of an existing program? Yes	Related to TMDL? No

BMP 4(c)	Preconstruction meetings		
Description	Preconstruction meetings are required by Public Works policy for all development projects >5,000 square feet to discuss plans, including those for erosion and sediment control.		
Measurable Goals	Preconstruction meetings will be held for all projects with land disturbance >5,000 square feet.		
Milestones	December 27, 2010-Construction Site Requirements for Erosion and Sediment Control Ordinance passed, requiring preconstruction meeting		
Is another entity involved in BMP implementation? No	If yes, describe:	Part of an existing program? Yes	Related to TMDL? No

BMP 4(d)	Construction Site Training		
Description	Training will be held to cover the following topics: sediment and erosion control, construction site ordinances, policies and regulations, and construction site stormwater permitting.		
Measurable Goals	Maintain attendance by local construction site operators.		
Milestones	2012 -Workshops and lunch and learns for developers created, materials gathered October 2012 – Develop annual inspector training program		

Is another entity involved in BMP implementation? No	If yes, describe:	Part of an existing program? No	Related to TMDL? No
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BMP 4(e)	Construction Site Inspections		
Description	Self-inspections will be required by the Public Works Director to be performed weekly and after ½ inch rain events and self-inspection reports must be available upon request. The city has the right to conduct routine inspections, random inspections, inspections based on complaints or other notice of possible violations, and joint inspections with other agencies. Inspection reports are to be kept for up to one year by the contractor.		
Measurable Goals	Inspections will be tracked with inspection sheets. Deficiencies will be followed-up on with educational efforts and enforcement actions. The number of enforcement actions will be tracked.		
Milestones	December 27, 2010– Construction Site Erosion and Sediment Control Regulations September 2012 – Develop annual inspector training program Ongoing – conduct construction site inspections		
Is another entity involved in BMP implementation? No	If yes, describe:	Part of an existing program? Yes	Related to TMDL? Yes

BMP 4(f)	Municipal Employee/Staff Training on Construction Site Topics		
Description	Inspectors, planners and other necessary staff will be trained on inspection and evaluation of construction site BMPs, ordinances, policies and protocols necessary to their positions.		
Measurable Goals	Sign in sheets and post tests will be filed in the Public Works office to document training.		
Milestones	September 2012 – Research and develop annual training program Ongoing – conduct training annually		
Is another entity involved in BMP implementation? No	If yes, describe:	Part of an existing program? Yes	Related to TMDL? Yes

MCM Components

Part II.C.b.4.a.

18.j. Do you have an Ordinance to control construction site run-off?

Yes

Part II.C.b.4

18.k. Does your program regulate disturbance of on acre or more and also less than one acre if part of a larger common plan? Does your Ordinance regulate disturbances of less than one acre? If so, what is the size threshold?

Yes, the size threshold is 5,000 square feet.

Part II.C.b.4.a.i-ix.

18.l. Does your Ordinance contain the nine required components?

The ordinance includes six of the nine required components: sediment & erosion control BMPs; requirements for construction site operators to actually implement these BMPs and to control waste; demonstration of appropriate NPDES registration; authority for site plan review; and authority for site inspections & enforcement.

The two remaining components: authority for public input, adequate funding for inspections & enforcement and training for construction site operators are not specifically addressed in the ordinance. The city will put these before city council and will consider incorporation of these components into their ordinance according to the schedule described under 18.r and will also address these components as follows:

Authority for public input-Public input on construction site issues will be collected through the illicit discharge report link on the web page and through the anonymous tip line.

Training for construction site operators- A PowerPoint presentation will be prepared for developers and managers of public projects. A guide for operators will be developed based on EPA recommended materials. Additional training sessions and materials will be developed for changes to ordinances and standards resulting from the requirements of Controlling Runoff from New Development and Redevelopment (MCM 5).

Adequate funding for inspections and enforcement- We will write adequate funding for inspections and enforcement into the budget for 2012 - 2013

Tip: The nine required components your ordinance must address include: Sediment & erosion control BMPs; requirements for construction site operators to actually implement these BMPs and to control waste; demonstration of appropriate NPDES registration; authority for site plan review; authority for public input; authority for site inspections & enforcement; adequate funding for inspections & enforcement; and training for construction site operators.

18.m. Describe the plan review process for your construction site run off program.

During the plan review process, the Building Inspector, Planner and/or Public Works Director look over the site plan to see if erosion and sediment control devices are indicated.

18.n. Describe the inspection process of your construction site run off program.

Over the course of a building project, the Building Inspector makes multiple visits to inspect various components. During each visit, erosion and sediment control devices are inspected.

18.o. Describe the enforcement process of your construction site run off program. If a violation is observed during the course of an inspection, a warning is first issued. If the warning is not heeded in a defined amount of time, a citation is issued where the person(s) responsible would be assessed a penalty in accordance with the Ordinance.

Part II.C.b.4.b.

18.p. Discuss how your program will address the regulation of both private and public sector construction site run-off.

All are required to follow Construction Site Erosion and Sediment Control Ordinance – Article 970.

Private projects with greater than 5,000 square feet of land disturbance will go through erosion and sediment control review prior to being issued a building permit. Inspection for construction projects will be conducted by city inspection staff. Enforcement actions are detailed under 18.o above.

Although we do not currently perform construction projects, any contracted municipal projects are required to implement sediment and erosion control plans for sites 5,000 square feet or larger. For very small sites (less than 5,000 square feet), standard operating procedures (SOPs) are followed to minimize sediment and erosion control and prevent pollution on site. Inspection for construction projects is conducted by inspection staff so that deficiencies are corrected promptly.

Schedule

Part II.C.b.4.a.

18.q. The Ordinance shall be reviewed on an annual basis. Describe your Ordinance review and update procedures.

The ordinance was reviewed during the development of this SWMP and updates for compliance with 2009 NPDES General Permit will be discussed with city council. The ordinance will continue to be reviewed annually.

18.r. If your Ordinance does not contain the standards required by the permit, provide a schedule for implementation and measureable goals for getting these components into your Ordinance. Include a mid-point and full implementation date.

Authority for public input, adequate funding for inspections and enforcement and training for construction site operators need to be incorporated into the construction site ordinance for compliance with the 2009 NPDES General Permit. The ordinance will be updated according to the following schedule:

Construction Stormwater Regulations Adopted	December 27, 2010
Construction Site Ordinance Reviewed for compliance with 2009 NPDES General Permit	March 2012
Draft Construction Site Ordinance developed	October 2012
Review of the updated Construction Site Ordinance by the SWC	November 2012
Adoption of updated Construction Site Ordinance	December 2013

Tip: The components of your construction site runoff control program must include:

- Plan review and approval process for new development and redevelopment projects
- Inspection protocol
- Development of enforcement strategy
- Education and training for construction site operators
- Development of an application process.
- Record keeping for approved projects, inspections, and enforcement.

Measurable Goals

Part IV.A. & Part II.B.4

18.s. List and fully describe your measurable goal(s) for this minimum control measure.

BMP	Measurable Goal	Description
4(a) Construction Site Ordinance	The ordinance will be reviewed annually for compliance with stormwater regulations and to make sure it is meeting the needs of the community.	The ordinance was reviewed during the development of this SWMP and updates for compliance with 2009 NPDES General Permit will be discussed by the stormwater committee. The ordinance will continue to be reviewed annually according to the schedule described
4(b) Construction Site Plan Review	All applicable construction sites will have erosion and sediment control plans approved prior to construction.	Construction plans with >5,000 square feet of land disturbance have erosion and sediment control plans reviewed by the planner and building inspector.
4(c) Preconstruction meetings	Preconstruction meetings will be held for all projects with land disturbance >5,000 square feet.	A preconstruction meeting is required for all projects to discuss erosion and sediment control plans prior to land disturbance.

4(d) Construction Site Training	Maintain attendance by local construction site operators. Head count, sign in sheets and post-tests will be documented.	The city will plan trainings for changes in regulations and construction site BMPs. The city will advertise these events to the development community and attendance will be recorded.
4(e) Construction Site Inspections	Inspections will be tracked with inspection sheets. Deficiencies will be followed-up on with educational efforts and enforcement actions. The number of enforcement actions will be tracked.	The building inspector will conduct regular inspections for sediment and erosion control. Inspections will be tracked with inspection sheets. Deficiencies will be followed up and enforcement actions will be tracked.

Tracking

Part II.B.7.

18.t. Describe your plan for tracking activities associated with this minimum control measure.

The following items will be filed at the Public Works office to track activities.

- Copies of all literature distributed
- Copies of all information put on the stormwater web page
- Clippings of all newspaper articles/announcements related to the SWMP
- Sign in sheets, post-tests and minutes from all meetings and training sessions
- Feedback, in the form of emails, calls, and direct communication
- Records of violations and enforcement actions
- Review checklists from erosion and sediment control plan submittals
- Construction site inspection sheets
- Records of calls received to the illicit discharge web link related to construction sites and their resolution

Evaluation

Part II.B.7

18.u. Explain how you plan to gauge the effectiveness of your Construction Site Run-off Control program.

Measureable goals will be used to evaluate the effectiveness of the Construction Site Run-off Control program. In addition, the occurrence of compliance issues will be used to gauge the effectiveness of the program. The following compliance issues will be tracked and will trigger additional educational campaigns, changes to local regulations, or changes to enforcement strategies:

- Failure of developers to submit plans in advance of land disturbance
- Failure of developers to develop sufficient erosion and sediment control plans
- Failure of developers to maintain erosion and sediment control measures

Controlling Run-off from New Development and Redevelopment – MCM #5

Part II.C.b.5

Responsible Person(s):

Identify the responsible person(s) for implementing this MCM. There may be more than one person or department responsible for various portions of this control measure, If so, discuss.

- 19.a. Name: David Hagley P E
- 19.b. Title: Director
- 19.c. Department: Public Works
- 19.d. Address: PO Box 1659, Huntington, WV 25717-659
- 19.e. Phone number: 304-696-5903
- 19.f. Email address: hagleyd@cityofhuntington.com
- 19.g. Is another entity sharing responsibility for this MCM? If so, who?

Tip: This MCM will likely have more than one department responsible for implementation. Often planning, zoning, building, public works; sewer boards, and stormwater managers are involved in the new development and re-development program. Explain who deals with each component of this MCM.

Control Objectives & BMPs

19.h. State your overall objective for this MCM.
 Our objectives for the Post-Construction Stormwater Management in New Development and Redevelopment MCM are to build on BMPs previously initiated; promote effective structural stormwater BMPs; create a program to reduce pollutants in stormwater runoff from new development and redevelopment activities through a program of local regulations, plan review, and ongoing maintenance; and meet the wasteload allocations defined in the TMDLs, including reduction of fecal coliform, aluminum and other metals, in the discharge from the selected BMPs.

MCM Components

Watershed Protection Elements

Part II.C.b.5.ai.

19.i. Have you incorporated the six watershed protection elements into your subdivision ordinance or equivalent document? We have ordinances which cover tree protection and protection of ecologically sensitive areas. We plan to develop a watershed base plan with the Fourpole Creek Watershed Association, the Huntington Sanitary Board and the West Virginia Conservation Agency each informing the plan. In this plan, we will incorporate each of the watershed protection elements. As well, in our city’s comprehensive plan, we will incorporate these elements.

Name the document(s) where each element is found & give the review date for the document. * If there is no review, describe how you will incorporate the element into your document(s).

Watershed Protection Elements	Name of document that contains the element	*Review Date
1. Minimizing impervious surfaces	Will incorporate into Watershed Base and Comprehensive Plans	June 2015
2. Preserving ecologically sensitive areas	Development Ordinance Will incorporate into Watershed Base and	12/28/2000 June 2015

	Comprehensive Plans	
3. Reducing thermal impacts	Will incorporate into Watershed Base and Comprehensive Plans	June 2015
4. Reducing or avoiding hydromodification	Will incorporate into Watershed Base and Comprehensive Plans	June 2015
5. Tree protection	Development Ordinance and Zoning Ordinance and new policy which will be put before city council as an amendment to the Urban Forestry ordinance, which will require that someone from the UFC sign off that they have inspected the tree before it can be removed from the urban forest.	12/28/2000 and 12/14/1998 April 2012 – new ordinance reviewed by council
6. Protection of native soils, prevention of compaction of soils	Will incorporate into Watershed Base and Comprehensive Plans	June 2015

19.k. State and describe your BMPs. Indicate if any BMPs are part of your existing program.

BMP 5(a)	Wasteload Allocation and Stormwater Monitoring		
Description	Sampling for fecal coliform, TSS and Total Aluminum will be conducted two times per year at the representative outfall. Visual outfall inspections and outfall flow monitoring will be conducted annually Illicit discharge monitoring (under Part IV.B. above) will note evidence of fecal coliform, aluminum and TSS. Illicit discharge tracking (under Part II.C.b.3.c. below) will note removal of fecal coliform and reduction in sediment which could contain aluminum and other metals.		
Measurable Goals	BMPs related to TMDLs will be evaluated and the change in wasteload of fecal coliform, sediment and metals will be estimated based on ongoing monitoring.		
Milestones	2012 - Fourpole Creek Watershed Plan begins 2014- Fourpole Creek Watershed Plan completed and submitted to DEP, implementation begins July 2012-Begin representative outfalls sampling to establish baseline August 2012-Establish timeline for evaluation of outfall and receiving water sampling		
Is another entity involved in BMP implementation? Yes	If yes, describe: Trained FCWA, MU volunteers and citizen volunteers	Part of an existing program? Yes	Related to TMDL? Yes

BMP 5(b)	Development of Post-Construction Ordinance and Standards		
Description	Development of post-construction ordinances and standards will be made to manage runoff volume and quality as well as reduce fecal coliform, sediment and metals in stormwater runoff.		
Measurable Goals	The ordinance will be developed and reviewed annually for compliance with stormwater regulations and to make sure it is meeting the needs of the community. Stormwater monitoring and wasteload allocation monitoring measureable goals will also be monitored for this BMP.		
Milestones	2012- Development of ordinance and discussions with city council begin 2014- City of Huntington adopts Ordinance for post-construction 2015-Huntington incorporates state manual (see BMP 5(H)) into their standards and adopts necessary stormwater measures		
Is another entity involved in BMP	If yes, describe:	Part of an existing program?	Related to TMDL? Yes

implementation? No		No	
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BMP 5(c)	Define Post-Construction Requirement Process		
Description	The city will work with stakeholders to define legal authority and procedures for post-construction stormwater management plan review, inspection, recordkeeping and enforcement for public and private projects.		
Measurable Goals	A plan for updating the Post-Construction Requirement Process will be developed.		
Milestones	2012- Meet with stakeholders to begin to define requirement process 2015 –Requirement process completed and implementation /education period begins		
Is another entity involved in BMP implementation? No	If yes, describe:	Part of an existing program? No	Related to TMDL? Yes

BMP 5(d)	Post-Construction BMP Tracking and Inspection		
Description	The city will track structural BMPs in their GIS system and develop a system for compiling inspection records.		
Measurable Goals	All current and new structural BMPs will be included in the GIS system.		
Milestones	2012-Begin GIS mapping of all structural BMPs, October 2012- set up inspection schedule and maintenance schedule for BMPs owned by the city Ongoing inspections and routine maintenance		
Is another entity involved in BMP implementation? Yes	If yes, describe: Trained FWCA, MU volunteers, citizen volunteers will be necessary to complete mapping in a timely and cost effective manner	Part of an existing program? No	Related to TMDL? Yes

BMP 5(e)	Post-Construction Structural BMP Operation and Maintenance Program		
Description	Operation and maintenance program will be established for City-owned structural BMPs.		
Measurable Goals	All City-owned structural BMPs will be recorded in the City GIS and have an O&M plan. Regular inspections will be conducted and documented		
Milestones	2013-Complete GIS mapping of all City-owned BMPs 2014- Compile O&M Plans for City-owned BMPs		
Is another entity involved in BMP implementation? No	If yes, describe:	Part of an existing program? No	Related to TMDL? Yes

BMP 5(f) Hal Greer Boulevard Underpass Storm Water Reduction Conceptual Planning Study	Hal Greer Boulevard Underpass Stormwater Reduction Conceptual Planning Study		
Description	The study was compiled as a joint effort between the City of Huntington, the Huntington-Ironton Empowerment Zone and Edward Tucker Architects by GAI Consulting. The plan incorporates several low impact design concepts to reduce flooding of the underpass, which are economical and sustainable. As we are able to secure funding, we will begin to complete the project. It was designed to be able to complete at \$100,000-\$500,000 increments.		
Measurable Goals	The study will be completed in increments as funding is available. The implementation of		

	this plan will offer the opportunity to document the amount of flooding that occurs in the underpass before and after the project is complete.		
Milestones	2010 – Study Published		
Is another entity involved in BMP implementation? No	If yes, describe:	Part of an existing program? No	Related to TMDL? Yes

BMP 5(g)	Update Comprehensive Plan		
Description	Huntington is updating their Comprehensive Plan and the updates will include the 6 Watershed Protection Elements.		
Measurable Goals	Updates to the Comprehensive Plan are used to direct development to incorporating the 6 Watershed Protection Elements.		
Milestones	2012-Huntington is currently updating their Comprehensive Plan 2013 Updated Comprehensive Plan adopted		
Is another entity involved in BMP implementation? No	If yes, describe:	Part of an existing program? Yes	Related to TMDL? Yes

BMP 5(h)	Participation in state’s stormwater manual development committee		
Description	A city employee will stay apprised of stormwater manual development committee meetings and participate in the development of the manual. Huntington plans to use the completed manual as a basis for a new stormwater manual.		
Measurable Goals	Huntington will send a representative to state stormwater manual development committee meetings or make sure that they stay up to date on its development and utilize information to develop their local stormwater manuals with the elements required by the general permit.		
Milestones	2012-Participation in storm water manual development 2014-State Stormwater Manual Completed 2015-Huntington incorporates state manual into their standards and adopts necessary stormwater measures		
Is another entity involved in BMP implementation? Yes	If yes, describe: State Committee	Part of an existing program? No	Related to TMDL? No

Site Design Standards

Part II.C.b.5a.ii.A.1.

19.1. Do you have an ordinance or other enforcement mechanism for the required site design standards? If not, what is your schedule of implementation? Include mid-term and full implementation dates for Ordinance review and enactment.

No, but we have the following drainage plan requirements now enforced in the City of Huntington

The proposed development (i.e. post-development) must not displace more rainwater runoff than before the proposed development (i.e. pre-development) for any parcel or development greater than 5000 square feet.

1385.03 PRELIMINARY PLANS.

(l) Drainage. A drainage report shall be submitted which shows as a minimum the

pre-development storm runoff, the post development storm runoff, the impact of the storm runoff on downstream drainage features, and any measures required to mitigate these impacts. Retention ponds or other measures to alleviate these impacts may be required as part of the development.

The required ordinance and standards will be reviewed by the stormwater committee by October 2012.. A compliant ordinance will be drafted by July 2013, brought to the SWC by August 2013 and brought to council for adoption by September 2013. Updated standards will be developed to address specific requirements and regulated site design standards for stormwater management and drainage by 2015

A stormwater manual, including stormwater standards and specifications, will be completed within a year of the publication of the WV state stormwater manual to comply with MCM 5. We will use the state manual as a template for our city manual, making adjustments to meet the specific needs of our community. The West Virginia state manual will provide much of the required language to update the stormwater manual. Education & training on the new manual contents will be performed as a part of public outreach and education activities. If the state manual lacks the technical detail required for the local manual, additional requirements will be developed by the city.

The requirements for site and neighborhood design will be implemented within four years of SWMP approval. The city will begin evaluating current regulations for how friendly they are to sustainable development and explore opportunities to create incentives for sustainable development. The city conducted a stormwater study in April 2012 which examined opportunities for green infrastructures. Huntington will use this document to continue to explore opportunities to create incentives for sustainable development.

The City of Huntington Planning and Development Department is developing a Comprehensive Plan that is updated every 10 years. The next update is in the process of happening now. This update is an opportunity to incorporate changes required by the general permit and changes which would encourage sustainable infrastructure and would include attention to the 6 Watershed Protection Elements.

Tip: The site design standards should include managing the 1st 1-inch of rainfall in a 24-hr storm following 48 hrs without rain.

There are several practices that manage rainfall on site including: canopy interception, soil amendments, evaporation, rainfall harvesting, engineered infiltration, extended infiltration, and evapotranspiration and any combination of these practices.

Part II.C.b.5.ii.A.2.i,ii

19.m. Does your Ordinance have provisions for reducing pollutant loadings for stormwater discharges from Hot Spots? If the project is a potential hot spot and cannot meet water quality treatment with on-site controls, are there provisions for proper disposal of stormwater discharges at a treatment/disposal facility?

No, the ordinance and standards that the city is developing will incorporate provisions for proper disposal of stormwater discharge from hot spots in cooperation with the Huntington Sanitary Board.

Part II.C.b.5.ii.A.2.iii

19.n. Do you know where drinking water source protection areas are located within your MS4 watershed? Describe how this information will be kept confidential, and made available to WVDEP only when requested.

Yes, we know where they are. Our drinking water source is the Ohio River Drainage Basin. The Health Department and West Virginia American Water

Cabell Huntington Health Department – Environmental Department – Beverly Spurlock – Sanitarian

As GIS mapping is completed, drinking water information will be accessible only to city staff.

19.o. Describe your program for reducing impervious surfaces.

There is currently no program in place. The ordinance and standards the city is developing will have provisions for reducing impervious surface from new development and redevelopment. The city will evaluate current regulations for how friendly they are to sustainable development and explore opportunities to create incentives for sustainable development, including reduction in impervious surface. The city will be completing a permeable paver pilot project and will be showcasing this site as an educational opportunity for developers as one of our SEPs.

19.p. If you choose mitigation/payment in lieu for those projects that cannot implement the one inch runoff reduction requirements, please provide a time frame for creating an inventory of appropriate mitigation projects, and your process to develop standards to value, evaluate, and track transactions. The city of Huntington does not currently have a mitigation or payment in lieu program and will likely use what WVDEP develops.

Part II.C.b.5.ii.B.(1)

19.q. Describe the planning process for new development and redevelopment projects in your MS4. Plans are submitted to the Planning Department for drainage plan review. The city currently holds preconstruction meetings for projects disturbing more than 5,000 square feet.

Part II.C.b.5.ii.B(2)&(3)

19.r. Describe your plan review and approval process for new development and redevelopment projects. New development usually starts with preliminary discussions with all of the inspectors in order to get clarification on the requirements. At this stage, the requirements for site plans – including erosion and sediment control – as well as requirements for pre- and post-construction drainage analysis are communicated to the developer. If the drainage analysis shows an increase in storm water run-off, mitigation is required so that there is no increase.

Once the requirements are fulfilled, and the permits are issued, the inspectors visit at various stages to ensure compliance with applicable codes, including the storm water requirements. Once the development is completed, a final inspection is completed and a certificate of use and occupancy is issued if the development was built to the requirements. As-built drawings are only required if the development was located within a special flood hazard area.

As new stormwater requirements are developed, an educational program will be developed to train staff and others involved on new requirements. Plan review will be conducted by staff or an outside consultant trained in controlling runoff from new development and redevelopment as outlined in the stormwater permit.

Part II.C.b.5.ii.C

19.s. Describe your maintenance procedures for structural stormwater control practices including a detailed discussion about maintenance agreements & your ability to enforce them.

Compliance inspections and inspection programs by the city may be conducted or established on any reasonable basis, including but not limited to routine inspections; random inspection; inspections based upon complaints or other notice of possible violations; and joint inspections with other agencies inspecting under environmental or safety laws during or after construction. Inspections may include, but are not limited to, compliance checks of the approved plan and the grading and stormwater permit, reviewing land disturbing activity and plan effectiveness, reviewing maintenance and repair records; and once our inspectors and planners are properly trained, they will review for compliance with the standards of the BMP; sample discharges, surface water, groundwater, and material or water in BMPs; and evaluate the condition of BMPs. Notice of the right to inspect for proper maintenance of BMPs shall be included in the approval of each permit application. We will write a maintenance agreement into the application process to be signed before permits are issued.

Part II.C.b.5.ii.D

19.t. Describe your method of inventory and tracking of stormwater control practices for this MCM. Structural stormwater BMPs will be photographed, put into the GIS system and tracked online. Source control and treatment practices are inventoried through MCMs 3,4 and 5 BMPs – inventory and tracking sheets for stream inspections, all mapping, source pollution remediation, construction site inspections and enforcement outcomes. Maintenance requirements will be defined in the structural BMP M & O literature used in training and will be on file in the Public Works office.

Part II.C.b.5.ii.E

19.u. Describe your inspection protocol for ensuring stormwater control BMPs/practices function as designed and constructed: How many per year? How often?
Currently, inspection is conducted during construction. Schedules and SOPs for post construction inspection will be developed when we develop the Post-Construction requirement process, ordinance and standards. This is scheduled for completion by December 2013. All requirements for the inspection protocol will be met.

Part II.C.b.5.b.

19.v. Does your MS4 have requirements for street design, parking, and parking lots? If so, which departments regulate this?

The Public Works Department follows WVDOH standards for street design and on-street parking. The Development and Planning Department has regulations concerning parking design that are found within the Zoning Ordinances in sections 1343 and 1387. Street design improvement standards are described in section 1389.04. Water supply improvements are detailed in section 1389.04 (b) and areas directly affecting the MS4 are 1389.04 (b) 3,4 and 5.

Schedule

Part II.C.b.5

19.w. Describe how and when you will implement each component of this minimum control measure. Include mid-point and full implementation dates for Ordinance revisions, implementation of plan review and approval, inspection and enforcement procedures, and for developing/acquiring and using a tracking system.

Component	Initiation	Interim Date	Full Implementation
Ordinance/Standards Developed	December 27, 2010- Construction Site Stormwater Regulations passed	obtain West Virginia state stormwater manual	July 2015-Updated ordinance and standards adopted.
Implementation of Plan Review and Approval	December 27, 2010- Construction Site Stormwater Regulations passed, plan review and approval initiated.	June 2012- Ordinance review and updates to plan review and approval	July 2015-Updated ordinance and standards adopted.
Inspection and Enforcement Procedures	December 27, 2010- Construction Stormwater Regulations passed, inspection and enforcement initiated	June 2012 - Ordinance review and updates to inspection and enforcement procedures	July 2015-Updated ordinance and standards adopted.
Tracking system	2012- Current structural BMPs will be put into GIS system	Ongoing – Structural BMPs are mapped as they are installed	Ongoing
Update Comprehensive Plan	Ongoing-Discuss Watershed Protection Elements with Planning Department	2012- Huntington updates their Comprehensive Plan to be published by 2013	Ongoing – incorporate the 6 Watershed Protection elements into development plans
BMP 5 (a) Wasteload Allocation and Stormwater Monitoring	2012- Fourpole Creek Watershed Plan beginning	2014- Fourpole Creek Creek Watershed Plan completed, implementation begins	September , 2012-Begin representative outfalls sampling to establish baseline, establish timeline for evaluation of outfall and receiving water sampling
BMP 5 (b) Develop Post-Construction Ordinance and Standards	Standards/Ordinance reviewed by SWC October 2012	Updated standards developed - May 2013 Ordinances drafted - July 2013 Ordinance SWC Aug 2013	Post construction ordinance passed Sept 2013
BMP 5 (c) Define Post-Construction Requirement Process	Ongoing-Discuss post-construction requirements with stakeholders	2013-Complete definition of process and compare to State Manual when published	One year after mstate manual published-Adopt necessary stormwater measures based on state guidelines and city needs
BMP (d) Post-Construction BMP Tracking and Inspection	2012-Begin GIS mapping of all BMPs	2013-Compile O&M Plans for constructed BMPs	Ongoing – Maintain mapping , development of O&M plans and database
BMP 5(e) Post-Construction BMP Operation and Maintenance Program	2013-Complete GIS mapping of BMPs	2014- Compile O&M Plans for City-owned BMPs	Ongoing – Maintain mapping, O&M plans and database for all new BMPs established
5(f) Hal Greer Boulevard Underpass Storm Water Reduction Conceptual Planning Study	April 2010 – Study published	Ongoing progress as funds are available	Ongoing as funds are available
5(g) Update Comprehensive Plan	Ongoing-Discuss Watershed Protection Elements with Planning Department	2012- Huntington updates their Comprehensive Plan to be published by 2013	Ongoing – incorporate the 6 Watershed Protection elements into development plans

5(h) Participation in state's stormwater manual development committee	2012-Participation in storm water manual development	2014-State Stormwater Manual Completed	2015-Huntington incorporates state manual into their standards and adopts necessary stormwater measures
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Measurable Goals

Part IV.A

19.x. List and describe your measurable goals for this MCM.

BMP	Measurable Goal	Description
BMP 5(a)Wasteload Allocation and Stormwater Monitoring	BMPs related to TMDLs will be evaluated and the change in wasteload of fecal coliform and metals will be estimated based on ongoing monitoring.	The data collected from the monitoring efforts will be tracked to see if BMPs have been successful in reducing fecal coliform and metals in runoff and receiving waters.
BMP 5(b)Revisions to Post-Construction Ordinance and Standards	The ordinance will be reviewed annually for compliance with stormwater regulations and to make sure it is meeting the needs of the community. Stormwater monitoring and wasteload allocation monitoring measureable goals will also be monitored for this BMP.	Post-construction regulations will need to establish appropriate BMPs, monitoring, and operation and maintenance to be effective. The effectiveness of the local regulations will be reviewed annually.
BMP 5 (c) Define Post-Construction Requirement Process	A plan for updating the Post-Construction Requirement Process will be developed.	The city will meet with stakeholders, including the SWC, the Huntington Sanitary Board, developers and others, to determine the best strategy for updating the Post-Construction Requirements.
BMP 5 (d) Post-Construction BMP Tracking and Inspection	All new BMPs will be included in the GIS system and have a corresponding O&M manual by 2013.	The GIS Department will include all new BMPs into the GIS system. Corresponding O&M manuals will be kept on file. Once the post-construction ordinance is passed, requirements for submittal will be established.
BMP 5 (e) Post-Construction BMP Operation and Maintenance Program	All City-owned BMPs will be recorded in the City GIS and have an O&M plan. Regular inspections will be conducted.	The GIS Department will include all City-owned BMPs into the GIS system. Corresponding O&M manuals and inspection records will be kept on file.
5(f) Hal Greer Boulevard Underpass Storm Water Reduction Conceptual Planning Study	The study has been completed and the city is researching possible funding sources to begin phase one. Ongoing as funding is available.	The Hal Greer Boulevard Underpass Storm Water Reduction Conceptual Planning Study is slated to be completed in phases as funding permits.
5(g) Update Comprehensive Plan	Updates to the Comprehensive Plan are used to direct development to incorporating the 6 Watershed Protection Elements.	The Comprehensive Plan is being updated in 2012. Inclusion of the 6 Watershed Protection Elements will be discussed with City Planning and will be incorporated into the revised plan, due to be published by 2013.

Evaluation

Part II.B.7

19.y. Describe how you plan to gauge the effectiveness of your program for this MCM.

Measureable goals will be used to evaluate the effectiveness of the Controlling Run-off from New Development and Redevelopment program. In addition, the occurrence of compliance issues will be used to

gauge the effectiveness of the program. The following compliance issues will be tracked and will trigger additional educational campaigns, changes to local regulations, or changes to enforcement strategies:

- Failure of developers to submit plans in advance of land disturbance
- Failure of developers to develop sufficient drainage plans, operation, and maintenance plans, or other required materials
- Failure of developers and site owners to maintain structural BMPs will be tracked through regular inspections and the need to implement enforcement measures.

Pollution Prevention/Good Housekeeping for Municipal Operations- MCM #6

Part II.C.b.6

Responsible Person(s):

Identify the responsible person(s) for implementing this MCM. There may be more than one person or different departments responsible for various projects. If so, discuss.

- 20.a. Name: David Hagley, P E
- 20.b. Title: Director
- 20.c. Department: Public Works
- 20.d. Address: PO Box 1659 Huntington, WV 25717
- 20.e. Phone number: 304-696-5903
- 20.f. Email address: hagleyd@cityofhuntington.com

20.g. Is another entity sharing responsibility for this MCM? If so, who?

Control Objectives & BMPs

20.h. State your overall objective for this MCM.

The City of Huntington’s objective for the Pollution Prevention/Good Housekeeping MCM is to build on BMPs initiated since our 2010 audit and to further direct our resources towards preventing and reducing polluted runoff from municipal operations.

20.i. State and describe your BMPs. Indicate if any BMPs are part of your existing program.

BMP 6(a)	Municipal Facility Inspections
Description	Site walkthroughs will be conducted for all municipal facilities to document activities conducted, chemical storage, the potential for stormwater pollution, and training needs. If needed, additional BMPs will be recommended and then implemented to prevent/contain spills, conduct maintenance/washing activities indoors, and properly use/store all chemicals. Each facility will develop or update their operation and maintenance plan.
Measurable Goals	Conduct annual inspections of all municipal facilities and document updates to BMPs and operation and maintenance plans. Records of staff training on BMPs and facilities inspections will be retained.
Milestones	March 2011-Interviews conducted with municipal departments August 2011-Facility inspections conducted Ongoing-Implementation of BMPs and operation and maintenance plans

Is another entity involved in BMP implementation? No	If yes, describe:	Part of an existing program? No	Related to TMDL? No
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BMP 6(b)	Street Sweeping		
Description	Public Works conducts street sweeping to prevent debris from entering storm sewers.		
Measurable Goals	Record the amount of debris collected and the number of sweeping events.		
Milestones	Street sweeping is ongoing.		
Is another entity involved in BMP implementation? No	If yes, describe:	Part of an existing program? Yes	Related to TMDL? Yes

BMP 6(c)	Operation and Maintenance of MS4 System		
Description	The City of Huntington conducts maintenance on inlets, catch basins, outfalls and other infrastructure to prevent debris and illicit discharges from entering the MS4. Use of vactor truck to clean storm drains as needed.		
Measurable Goals	Record the amount of debris collected and the maintenance schedule. Records of staff training on BMPs and facilities inspections will be retained.		
Milestones	Operation and maintenance is ongoing		
Is another entity involved in BMP implementation? No	If yes, describe:	Part of an existing program? Yes	Related to TMDL? No

BMP 6(d)	Municipal Employee Stormwater Training		
Description	Employees who conduct activities that could impact stormwater, employees who conduct field assessments, and employees who investigate illicit discharge will receive appropriate training.		
Measurable Goals	Sign-in sheets and training materials will be maintained.		
Milestones	August 2012-Conduct walkthroughs of municipal facilities with staff -Prepare PowerPoint presentations and educational literature for staff training based on EPA recommendations January 2013-Conduct first staff training Ongoing- Continue annual training schedule		
Is another entity involved in BMP implementation? No	If yes, describe:	Part of an existing program? No	Related to TMDL? No

BMP 6(e)	Road Salt Application Program		
Description	BMPs will be documented to reduce the amount of salt entering the MS4 and receiving waters.		
Measurable Goals	Record the amount of salt applied. Records of staff training on BMPs and facilities inspections will be retained.		
Milestones	August 2012-Conduct walkthrough of salt storage area with staff September 2012- Research funding options to build a salt storage facility. 2014 – Salt and deicing supplies have a storage facility		
Is another entity involved in BMP implementation?	If yes, describe:	Part of an existing program?	Related to TMDL?
No		No	No

implementation? No		Yes	
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BMP 6(f)	Leaf pick up and Composting Program		
Description	The community is asked to bag leaves and we remove them regularly and compost them at the Dietz Hollow Landfill. This reduces the amount of leaves that clog storm drains. The leaf compost is made available for public use at no cost.		
Measurable Goals	Record the amount of leaves removed.		
Milestones	Ongoing		
Is another entity involved in BMP implementation? No	If yes, describe:	Part of an existing program? Yes	Related to TMDL? No

Additional BMPs which fall under multiple MCMs:

3(a) Storm Sewer Mapping

Volunteer and staff training/implementation - illicit discharge detection and remediation

3(c) Volunteer and staff training/implementation - stream/outfall inspections

4(d) New Development and Post Construction staff training

MCM Components

Part II.C.b.6

20.j. List the municipal facilities and their locations owned by your MS4.

Huntington Sanitary Board	Adams Ave.
City Hall	800 5 th Ave.
Floodwall Building	64 West 3 rd Ave.
Police Station	675 Tenth St.
Salt Storage Area	64 West 3 rd Ave.
City Garage	Corner of 2 nd Ave. and 5 th St.
Wastewater Treatment Plant	Vinson Rd.
Centennial Fire Station	7 th Ave.
University Fire Station	20 th St.
West Huntington Fire Station	West 5 th Ave.
Guyandotte Fire Station	Richmond St.
Westmoreland Fire Station	Camden Rd.
Gallagher Fire Station	Washington Blvd.

Part II.C.b.6.a

20.k. Briefly describe your operation and maintenance program for each municipal facility.

We do not have a storm water operation and maintenance program at any of our facilities. Current practices which would impact storm water include: “We do not put anything down the drain other than water, vehicle washing goes to a sewage line, used oils or fluids go into appropriate containers. We have a 55 gallon drum marked “used coolant”. We currently store salt at 94 West 3rd Avenue behind the flood wall building. The salt is stored outside covered with tarps with a concrete block barrier around it. We will be asking city council again for a salt storage shed in the upcoming budget discussions.” Direct communication with David Hagley, P E, Director of Public Works

Site walkthroughs will be conducted for all municipal facilities to document activities conducted, chemical storage, the potential for stormwater pollution, and training needs. Additional BMPs will be recommended, where appropriate, and then implemented to prevent/contain spills, conduct maintenance/washing activities indoors, and properly use/store all chemicals. Each facility will have an operation and maintenance plan and appropriate staff training.

Part II.C.b.6.a

20.l. Does each site have a pollution prevention plan? Is there a spill response plan included in the pollution prevention plan? If not, provide a time frame for developing pollution prevention plans at all MS4 owned municipal facilities, including mid-point and full completion dates.

Not all facilities have pollution prevention plans. Facility walkthroughs will be conducted in August 2012 and pollution prevention plans will be reviewed for required elements, including spill response plans. Facilities with missing or insufficient pollution preventions plans will develop new plans by August 2013

Part II.C.b.6.b

20.m. Have you identified all the lands owned or operated by your MS4? (Such as parks, road right-of-ways, maintenance yards, and water/sewer/stormwater infrastructure.)

We have street and floodwall right of way identified on maps. The Huntington Sanitary Board has mapped the sewer lines. West Virginia American water has mapped the water lines. We will be utilizing volunteers from the FCWA and Marshall University to update our storm drain system maps according to the mapping schedule defined in MCM 3. Our head of GIS will help with this as well.

Part II.C.b.6.b

20.n. Describe your overall pollution control approach policy and procedures for these lands.

Lands owned and operated by the MS4 are maintained by Public Works. Water, sewer and some stormwater infrastructure are maintained by the Huntington Sanitary Board. To date, our pollution control approach has been reactive, including enforcement, cleanup, and proper disposal of pollutant threats. Through the development of SOPs and pollution prevention plans during implementation of our SWMP, a more proactive approach will be taken.

Tip: Your policy and procedures plan should address fertilizers, pesticides, and herbicides; sediment and erosion control; landscape maintenance and vegetation disposal; trash management; cleaning and maintenance of building exteriors; chemical and material storage; street sweeping & cleaning of inlets/catch basins.

Part II.C.b.6.c

20.o. Describe your training program including your target employees, and how often training occurs. Annual training will be established for all employees whose job functions may impact stormwater quality. As well, city hall employees will be trained on educational materials to be distributed and where to direct community questions. Training will include the operation and maintenance plan for each facility, SOPs,

illicit discharges, and record keeping. Following site walkthroughs, PowerPoint presentations will be developed and given to appropriate staff.

20.p. For any industrial facilities owned or operated by your MS4, list each facilities registration number under the WV NPDES General Permit for Storm Water Discharges Associated with Industrial Activities or the individual WV NPDES permit number. If your industrial facilities are not covered under another NPDES permit, you must will prompted to provide additional information below.

Huntington Sanitary Board - WV0023159

Schedule

Part II.C.b.6

20.q. Describe how and when you will implement each component of your program for this minimum control measure. Include mid-point and full implementation dates.

BMP	Initiation of BMP	Interim Date	Full Implementation
6(a) Municipal Facility Inspections	March 2012-Interviews conducted with municipal departments	August 2012-Facility inspections conducted	Ongoing-Implementation of BMPs and operation and maintenance plans
Pollution Prevention Plans for City Owned/Run Facilities	August 2012 – walkthroughs performed	January 2013 – Inspection checklists developed, pollution plans being developed	Pollution plans in place by August 2013
6(b) Street Sweeping	Ongoing	Ongoing	Ongoing
6(c) Municipal Employee Stormwater Training	August 2012 – walkthroughs performed	Training developed from EPA training recommendations	Training begins January 2013 and will be ongoing
6(d) Operation and Maintenance of MS4 System	Ongoing	Ongoing	Ongoing
6(e) Road Salt Application Program	Ongoing	Ongoing	Ongoing
6(f) Leaf Pickup and Composting Program	Ongoing	Ongoing	Ongoing

Part II.C.b.6

20.r. Describe the inspection schedule for ensuring municipal facilities are in compliance with pollution prevention plans.

Annual site walkthroughs will be initiated in August 2012 to document activities conducted, chemical storage, the potential for stormwater pollution, and training needs. Operation and maintenance plans and documentation forms will be updated or developed following walkthroughs.

Measurable Goals

Part IV.A

20.s. List and fully describe your measurable goals for this MCM.

BMP	Measurable Goal	Description
6(a) Municipal Facility Inspections	Conduct annual inspections of all municipal facilities and document updates to BMPs and operation and maintenance plans.	Municipal facilities will be inspected annually to look for opportunities to increase staff awareness and pollution prevention practices. Records of these inspections and the resulting improvements will be kept.
Develop	Numbers of employees trained and post-tests will	Municipal facilities will be inspected annually to look for

Municipal Facility Pollution Plans	be tracked. Regular inspections will show success of plan implementation.	opportunities to increase staff awareness and pollution prevention practices in line with the pollution prevention plans. Records of these inspections and the resulting improvements will be kept.
6(b) Street Sweeping	Record the amount of debris collected and the sweeping schedule. Records of staff training on BMPs and facilities inspections will be retained.	Public Works Department conducts street sweeping. The number of lane miles and amount of debris collected will be recorded to optimize removal of debris that would end up in the MS4 system.
6(c) Municipal Employee Stormwater Training	Record the number of trainings and the number of employees who complete training through documentation using sign in sheets and post tests	Municipal employees will be trained in BMPs as they relate to stormwater. Each facility type will have training information customized to meet their needs and activities. Public Works employees will have stormwater and pollution BMP training monthly. Other facilities will have at least one training per year.
6(d) Operation and Maintenance of MS4 System	Record the amount of debris collected and the maintenance schedule. Records of staff training on BMPs and facilities inspections will be retained.	Public Works conducts maintenance activities for the storm sewer system. The number of structural maintenance projects and the amount of debris collected will be recorded to optimize removal of debris that would end up in the MS4 system.
6(e) Road Salt Application Program	Record the amount of salt applied. Records of staff training on BMPs and facilities inspections will be retained. We will present a plan for building a salt storage shed to city council in 2012-13 budget meetings.	Public Works Department stores and applies road salt mixtures. The amount of salt applied will be tracked and will be the minimum necessary for safe roads. Training and SOPs for road salt storage and application will be kept on record.
6(f) Leaf Pickup and Composting Program	Record the amount of leaves collected.	Public Works picks up bagged leaves on certain days in the fall and take them to the landfill to be composted for public use. This reduces the amount of leaves in storm drains. The amount of leaves will be recorded.

Tracking

Part II.B.7 & Part II.C.b.6.a.iii

20.t. Describe your plan for record keeping and tracking of facilities, employee training, pollution prevention plans, and inspections for this MCM.

The following items will be filed at the Public Works office to track activities:

- Documentation of site walkthroughs at City-owned facilities
- Operations and maintenance plans for City-owned facilities
- Sign-in sheets and copies of training materials for City employees
- Street sweeping events and amount of debris collected
- Maintenance schedule for the MS4 system and amount of debris collected
- Amount of salt and calcium chloride pellet used
- Amount of leaves collected for composting will be recorded

Evaluation

Part II.B.7

20.u. Explain how you plan to gauge the effectiveness of your good housekeeping/ municipal operations program efforts?

Measureable goals will be used to evaluate the effectiveness of the good housekeeping/municipal operations efforts. In addition, recurring training sessions and facility walkthroughs will be utilized to see if BMPs are being fully implemented by staff.

Industrial Stormwater Coverage for Municipal Operations

If your facility/s discharges stormwater from any industrial operation that is not covered under another NPDES permit, you must now obtain coverage for those discharges.

20v. For each facility, provide the name and contact information of the operator if applicable.
City Garage

20w. For each outlet, list the latitude and longitude to the nearest second and the River Mile Point (if known). Outlets from the City Garage go to the sanitary sewer. Stormwater drainage will be recorded as part of BMP 6(a) and a representative sampling point will be identified.

Outlet Number	Longitude	Latitude	River Mile
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20.x. List the Standard Industrial Classification (SIC) Code designated for your facility/s.
City Garage – 5169

20.y. List the nature of activity at the industrial facility.
“We do not put anything down the drain other than water, vehicle washing goes to a sewage line, used oils or fluids go into appropriate containers. We have a 55 gallon drum marked “used coolant”. We currently store salt at 94 West 3rd Avenue behind the flood wall building. The salt is stored outside covered with tarps with a concrete block barrier around it. We will be asking city council again for a salt storage shed in the upcoming budget discussions.” Direct communication with David Hagley, P E, Director of Public Works and Lucian Kimler

Behind Floodwall building –Salt is stored outdoors. Outdoor storage of material is bermed with concrete blocks.

City Garage -ASTs, fuel pumps, and equipment are also stored there and are not operational and slated to be removed this year. Truck washing is conducted indoors. Small amounts of maintenance chemicals are stored indoors. All parts are cleaned quarterly by an outside company. Oil, chemical fluids, etc. are stored in appropriate containers and marked.

20.z. Is there a wet pond at your facility that collects runoff from areas on which industrial activities occur?
If so, how many acres drain into it?

No.

20.aa. Is there a dry pond at your facility that collects runoff from areas on which industrial activities occur?
If so, how many acres drain into it?

No.

20.bb. Do any of your storm water outlets discharge through an oil water separator? If yes, provide the outlet numbers.

No.

Based on your responses to this section, a Discharge Monitoring Report may be issued.