

Responses to Letter from WVDEP MS4

Are the stormwater discharge points from the city into waters of the State known?

Mapping of the stormwater discharge points to the Coal, Kanawha, and a creek that flows into the Kanawha River has been completed. The stormwater discharge points were identified and mapped by Dunn Engineers, Inc. in a report dated November, 2004 and subsequently updated in January 2011 by Chapman Technical Group. Please see enclosed map identifying points.

How will educating the public about impervious surfaces produce any effects to reduce the volume of stormwater runoff? Or cause a change in behavior that result in less stormwater pollution?

Educating the public about impervious surfaces will make them aware of the impact on stormwater runoff. This is required under the state permit under item i. of the Public Education section, on page 5, of the WV General Water Pollution Control Permit. It is hopeful that by educating the public on alternative construction materials, such as permeable pavers, porous pavement, and green roofs, the public can make more informed decisions when rehabbing their own driveways or in how they direct the flow of water from their property. Have a public that is more knowledgeable about impervious surfaces may help public support and desire of green infrastructure projects within the city that typically have an initial cost higher than traditional methods.

Will the rain water reuse BMP also target developers and consulting engineers that may be required to submit plans?

Yes, the city will target developers and consulting engineers, in addition to the general public. However, the general public is the only audience identified in the plan reflecting the specific requirements outlined under item i. of the Public Education section, on page 5, of the WV General Water Pollution Control Permit. In addition, we plan on including rain water reuse in our Building Dept. applications.

Will the carpet cleaning BMP also target businesses that clean carpets? This is also a very good subject for staff training on illicit discharges.

Yes, the city will target both businesses, in addition to home owners and property managers. However, homeowners and property managers are the only ones identified in the plan to reflect the specific requirements outlined under item iii. of the Public Education section, on page 6, of the WV General Water Pollution Control Permit. We plan on including this information in the water bills, which will reach businesses in addition to home owners and property managers.

Runoff reduction BMP: When will the runoff reduction workshop be conducted?

The City of St. Albans has a live roof presentation planned for the St. Albans Rotary Club, February 28, 2012. Additional runoff reduction workshops such as rain barrels and permeable pavers will be conducted but exact dates have yet to be determined.

How often will education to Homeowners association representatives with a stormwater pond be conducted? Is this a one-time outreach or will outreach be conducted once a month, once a year, etc.?

The city will conduct a one-time outreach effort and will set-up a maintenance agreement with the HOA for the stormwater pond maintenance.

Sediment and Erosion Control BMP: Is the intent of the city that a quiz must be passed before issuing a building permit? What is meant by certification?

That was the intent. However, the city has chosen to amend their plan and do away with the quiz requirement. The intent is to have the contractor certify a statement (by signature) that he has reviewed the sediment and erosion control manual given to him by the city and he understands the proper use of sediment and erosion control BMPs.

Has a person been identified to maintain contact with web administrator to update the stormwater webpage?

Yes, Norman Clerc, City Stormwater Manager, will be the web administrator and update the webpage.

Does the city currently have procedures in place to remove illicit discharges when discovered?

The City has passed an ordinance with steps to have illicit discharges removed when discovered.

Does the city currently have enforcement capabilities to removed illicit and illegal discharges from the stormwater system?

Yes, by ordinance. The City has ordinances in place to empower the code enforcement officer to cause the removal of illicit discharges from the storm sewer system.

Please revisit how the city will provide training education on illicit discharges to its employees.

Changes have been made to the submitting MS4 plan, and illicit discharge training will be given through training videos on an annual basis. The most recent DVD training was completed January 17, 2013.

Does the city currently have a construction site runoff ordinance?

Yes, the stormwater ordinance addresses construction site runoff. Article 958, section 13.

Does the city currently conduct any training or outreach to construction site operators on proper sediment and erosion control?

The city isn't currently conducting any construction site outreach to construction site operators for there has not been any new/redevelopment site work requiring review at this point. The City does have linear project work being conducted by the City and construction site inspectors are onsite to monitor contractors and the proper use of sediment and erosion control BMPs.

Operation and Maintenance Agreement BMP: Is there a reason the city wouldn't require agreements for all (100%) of the new and re-development projects before construction? Does this mean that the remaining 25% will be secured after construction?

The MS4 plan has been revised to reflect obtaining agreements from all new and re-development projects before construction.

Does the city currently have any type of Ordinance that requires stormwater management? Are the six watershed protection elements currently contained within any ordinance or policy document of the city?

The city has passed a stormwater ordinance that addresses construction site runoff and requiring a reduction in runoff from new/redevelopment sites. However, items such as protecting, creating, and restoring ecological sensitive areas, reducing thermal impacts to streams, preventing hydro modification, protecting native soils, tree protection, and requiring treatment before infiltration have not been incorporating into the ordinance at this time.

Does the city currently have an operations and maintenance program in place for municipal facilities?

Yes, however the city needs to verify the use of good housekeeping practices in the existing operation and maintenance programs related to stormwater BMPs.

Please describe the employee training program including frequency of training.

Employees are trained by utilizing a DVD training program and by attending local training sessions and workshops. The frequency is dependent upon the employee's position. At minimum employees will be trained annually.

Please provide a list of all municipally owned facilities, the materials stored, including fuels or salt, and the latitude and longitude of the outfalls for each facility.

There aren't outfalls located at each facility.

Public Works- Salt, Used Oil, Fuel, Car Wash Soaps

38 ° 23' 10.55" N

81 ° 49' 41.59" W

Parks & Recreation- Pool Chemicals, Fuel?

38 ° 22' 09.31"

81 ° 48' 51.75"

St. Albans Pool

32 ° 22' 08.16" N

81 ° 49' 03.59" W

Police & Fire Station- Vehicle Washing Materials, Fuel?

38 ° 23' 12.53" N

81 ° 50' 16.26" W

City Hall- Vehicle Fueling Station

38 ° 23' 12.67" N

81 ° 49' 18.07 W

Which of the municipal facilities are not currently covered under an NPDES permit? I am assuming that the public works area, parks, and fire & police stations are not?

Public Works, Parks, City Hall, Fire and Police stations

The monitoring described on page 73, for municipal facilities will be determined by WVDEP. It appears that municipal facility monitoring is being confused with the monitoring required of the representative outfall.

This was misunderstood initially due to the misconception that the City needed to sample for the items under the industrial coverage section at the outfalls due to owning municipal works as described in the permit. The city has been sampling the two representative outfalls semi-annually, one on the Kanawha and one on the Coal, for BOD, COD, TSS, Ammonia Nitrogen, Oil & Grease, pH, Fecal, TKN, Nitrates, Nitrites, and Total Phosphorus. The city is aware that they are only required to sample one outfall for TKN, Nitrates, Nitrites, Total Phosphorus, and two outfalls for Fecal. The City has chosen to amend the MS4 plan to reflect sampling at the two chosen representative outfalls for TKN, Nitrates, Nitrites, Total Phosphorus and Fecal only.

The BMPs and measurable goals become requirements of your stormwater management program and MS4 permit once the permit application is approved.

The City has chosen to revise their stormwater management plan as enclosed.

Two copies are to be submitted by March 13, 2013.