



Town of Ashland

Center of the Universe

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October 1, 2015

Department of Environmental Quality
Piedmont Regional Office
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Glen Allen, VA 23060
Attn: Zachary Oremland

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ANDREA E.
ERARD
TOWN ATTORNEY

J. DALLIN
KIMBLE
CLERK OF COUNCIL

RE: FY 2014-2015 MS4 Annual Report, Town of Ashland
Permit Registration Number VAR040011

Dear Mr. Oremland:

The Town of Ashland is pleased to submit its report documenting compliance with the requirements of its MS4 Phase II permit. The Town of Ashland performed all of the activities required during the reporting period of July 1, 2014, through June 30, 2015.

The attached report details the activities performed in accordance with the items outlined in the General Permit. Where appropriate, we have included copies of documents that demonstrate achievement of these goals.

If you have questions regarding this report or require further information, please contact me or Ingrid Stenbjørn, PE, Town Engineer.

Sincerely,
Town of Ashland

Michael A. Davis, PE
Director of Public Works

Attachment: MS4 General Permit Report Permit Year July 1, 2014, through June 30, 2015

CC: Town Council
Charles Hartgrove, Town Manager

**Town of Ashland
MS4 General Permit Report
Reporting Year July 1, 2014 through June 30, 2015**

A. Background Information

1. Town of Ashland, General Permit Registration Number VAR04011
2. Permit Year July 1, 2014, through June 30, 2015
3. No modifications to operator's department's roles and responsibilities
4. Number of new MS4 outfalls and associated acreage by HUC added during the permit year: No new outfalls
5. Certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Charles W. Hartgrove
Town Manager

Date September 23, 2015

VAR040011
Permit Number

Town of Ashland
MS4 Name

B. Minimum Control Measure Implementation.

1. MCM1: Public Education and Outreach.

- a. *Items relating to Permit Section II.B.1.g(1): A list of the educations and outreach activities conducted during the reporting period for each high-priority water quality issue, the estimated number of people reached, and estimated percentage of the target audience or audiences reached.*

Per the Town of Ashland MS4 Public Education and Outreach Plan, updated April 30, 2015 (included as Attachment 1), the following estimated number of people and audience percentages were reached for these three high-priority water quality issues during this permit cycle:

- i. Pet waste: 90 pet owners were reached. This is 20% of the estimated population of 450 dog owners. The same numbers were achieved for last permit year.
 - ii. Lawn and yard care: 528 homeowners, apartment complexes, townhouse/condos and mobile home parks were reached. This is 20% percent of the estimated 2626 homeowners, 8 apartment complexes, 3 townhouse/condo complexes and 2 mobile home parks. The same numbers were achieved for last permit year.
 - iii. Unauthorized Discharges to MS4: 3 schools and 5 youth organizations were reached regarding fundraiser carwashes, and 10 restaurants were reached with information about proper disposal of cooking waste. This is 100% of the schools and the youth organizations, and 25% of the 40 restaurants. As a requirement for the last permit year, 14 churches in Town were reached regarding fundraiser carwashes. This is 100% of the population of churches.
- b. *Items relating to Permit Section II.B.1.g(2): A list of the education and outreach activities that will be conducted during the next reporting period for each high-priority water quality issue, the estimated number of people reached, and estimated percentage of the target audience or audiences reached.*
- i. Pet waste: 90 pet owners will be reached. This is 20% of the estimated population of 450 dog owners.
 - ii. Lawn and yard care: 528 homeowners, apartment complexes, townhouse/condos and mobile home parks will be reached. This is 20% percent of the the estimated 2626 homeowners, 8 apartment complexes, 3 townhouse/condo complexes and 2 mobile home parks.
 - iii. Unauthorized Discharges to MS4: 10 restaurants will be reached with information about proper disposal of cooking waste, and 5 auto parts retailers will be reached with information about proper disposal of automotive fluids. This is 25% of the 40 restaurants, and 100% of the auto parts retailers.
- c. Status of compliance with permit conditions:
- i. The Town of Ashland is in compliance with all requirement of MCM 1.

- d. **BMP assessment:**
- i. **Mailings:** Mailing of the flyers is difficult to assess. Most were not returned undeliverable. Letters septic tank pump out reminder letters were sent with receipt requests. All letters were delivered. In most cases, Town staff communicated with owners confirming that pump outs had been completed.
 - ii. **TV Slides:** It is difficult to assess how many people are reached by posting educational slides. However, the public access television station may be viewed by the greater Ashland area.
 - iii. **Website postings:** During the reporting period, the website had the following hits:
 - Stormwater page: 226
 - Car washing Guidelines: 30
 - Information and Media Link: Less than 20
 - Municipal Parking Lot LID Project: 66
 - iv. **Face Book postings:** During the reporting period, the Town's Face Book page received the following attention:
 - Video link: "Protecting Virginia's Waterways"
 - 800 people reached
 - 14 post clicks
 - 4 likes
 - 1 share
 - Video link: "Green Washing Your Car:"
 - 1000 people reached
 - 23 post clicks
 - 7 likes
 - 1 share
 - Link: "Town of Ashland MS4 Public Education and Outreach Plan" public comment request
 - 1224 people reached
 - 39 post clicks
 - 2 like
 - 1 share
 - Album share of educational materials
 - 209 people reached
 - 6 post clicks
 - 1 like
 - Photos of educational materials posted
 - 661 people reached
 - 121 post clicks
 - 4 likes
 - 1 share
 - Photo and reminder to pick up and properly dispose of pet waste
 - 1500 people reached
 - 139 post clicks

- 49 likes
 - Video link: “Dog Doogity”
 - 1100 people reached
 - 57 post clicks
 - 7 likes
 - 4 shares
 - Link to DCR booklet on healthy lawn & garden tips & techniques
 - 271 people reached
 - 3 post clicks
 - 1 like
 - Video link: “What the Heck is Stormwater Runoff?”
 - 362 people reached
 - 26 post clicks
 - 4 likes
 - Link to article about mulching leaves back into lawn
 - 2900 people reached
 - 212 post clicks
 - 17 likes
 - 11 shares
 - 3 comments
- e. Progress toward achieving measureable goal identified in the MS4 Program Plan:
 - i. Distribute 200 flyers: This was addressed with item a. above. See Attachment 2 for educational flyers that were distributed. Flyers are also left if distribution racks at Town Hall, Town Police Station, Library, Visitors Center, targeted businesses, and/or other public locations
 - ii. Air 4 seasonal slides on the Town’s public television station: See Attachment 3 for slides that were aired during the permit period.
 - iii. Articles on stormwater pollution prevention on Town website and social media; at least one each quarter: Rather than posting articles, the Town posted links to videos on the website and the Town’s social media site. The following links were posted over the permit period:
 - General information about stormwater:
<https://www.youtube.com/watch?v=kyH02NjyfPA#t=57>
 - Picking up after pets: <https://www.youtube.com/watch?v=jDh12w-jcfs>
 - Washing cars:
<https://www.youtube.com/watch?v=aT6yB9uK6M4>
 - General information about stormwater:
<https://www.youtube.com/watch?v=4zxfSQSVVRs>

Also see Attachment 4 for additional educational material that was posted on the Town’s website.
 - iv. Continue to collaborate with RMC on Mechumps Creek Restoration project; continue to publicize the project: No progress was made on this part of Mechumps Creek. However, the Town obtained a grant from the National Fish and Wildlife Foundation and another grant from the Virginia

Department of Environmental Quality (Stormwater Local Assistance Fund – SLAF) to perform a stream restoration on the part of Mechumps Creek next to the Ashland Police Department (APD), as well as replacing the parking lot with permeable paver. This project received media attention. See Attachment 5 for press release on this project.

- v. Continue to educate property owners in CBPAs of the Town’s requirements for septic tank maintenance: The Town of Ashland sends reminders to residents with septic tanks reminding them that they need to be pumped out every 5 years. See Attachment 6 for the spreadsheet of residents who receive reminders. Attachment 6 also contains a printout from the Town’s website with a reminder to septic tank owners to pump out their tanks.
 - vi. Additional items completed that were not in MS4 program Plan: Town staff made presentations at the following conferences. Presentations that were made at these conferences are included in Attachment 7:
 - o Water Jam 2014
 - o VWEA Conference
 - o VML Conference
 - o EPA Forum
2. MCM2 – Public Involvement/Participation.
- a. Items relating to Permit Section II.B.2.d(1): *A weblink to the MS4 Program Plan and annual report.*
 - i. <http://www.town.ashland.va.us/index.aspx?NID=251>
 - b. Items relating to Permit Section II.B.2.d(2): *Documentation of compliance with public participation requirements of this sediton.*
 - i. See Attachment 8 for the following items that document public participation:
 - List of Macon a Difference Day project. Macon a Difference Day is a service day for Randolph-Macon College students that takes place to celebrate Earth Day every year. Students perform a variety of mostly environmental projects in the community.
 - Photos of Randolph-Macon Students participating in Macon a Difference Day projects.
 - Letter inviting the Town Engineer to serve on an expert panel to speak with Randolph-Macon Students about stormwater requirements in the Town of Ashland.
 - Note from Town of Ashland staff indicating he reached out to elementary schools in the Town so that we may provide stormwater education.
 - Information sheet provided for Town Council on the Town’s stormwater programs so that Council members may communicate better regarding stormwater issues.
 - ii. Posted the Town’s Public Education and Outreach Plan for public comment. See attachment 9 for documentation.

- c. Status of compliance with permit conditions:
 - i. The Town of Ashland is in compliance with all requirements of MCM 2.
 - d. BMP assessment:
 - i. Substantial participation from Randolph-Macon College was achieved for Macon a Difference Day.
 - ii. Elementary schools in Ashland have agreed to allow Town Staff to make stormwater presentation to classes.
 - iii. When the Town posted the Public Education Plan for public comment, the site was visited 56 times by 44 unique visitors.
 - e. Progress toward achieving measurable goal identified in the MS4 Program Plan:
 - i. The following are items the Town committed to in its MS4 Program Plan, and how they were addressed.
 - Continue communication and collaboration with Randolph Macon College (R-MC):
 - Macon a Difference Day (see Attachment 8).
 - Continuing to search for grants/funding to perform the next section of restoration for Mechumps Creek on which R-MC and the Town are Collaborating.
 - Worked with two R-MC Interns during permit period.
 - Town Engineer attended R-MC classes as guest lecturer on the Town's stormwater program.
 - Work with volunteer group to mark or stencil stormwater inlets.
 - Some of the metal storm drain markers that were previously placed have been lost or stolen. Although the Town did not find a volunteer group to mark the inlets during this permit period, one of the R-MC interns performed a cost-value analysis of stormwater inlet marks/stencils and made recommendations. The Town has since ordered the paint on stencils because they cannot be stolen; and is seeking a volunteer group to apply them.
 - Establish contact with Elementary schools:
 - Contact with local elementary schools has been established. Town staff will coordinate to make stormwater presentations for the elementary schools.
 - Provide for public participation during public education and outreach program development:
 - See item 2.b.i above.
3. MCM3 – Illicit Discharge and Elimination.
- a. Items relating to Permit Section II.B.3.f(1): *List of any written notifications of physical interconnection given by the operator to other MS4s.*
 - i. None.

- b. Items relating to Permit Section II.B.3.f(2): *The total number of outfalls screened during the reporting period, the screening results, and details for follow-up actions necessitated by the screening results.*
 - i. All the Town’s MS4 outfalls were screened during the reporting period. The total number is 38.
 - ii. Nothing unusual was noted during the outfall screening. See Attachment 10 for outfall screening evaluation sheets.
 - iii. Based on the screening results, no follow up actions were needed.
- c. Items relating to Permit Section II.B.3.f(3): *A summary of each investigation conducted by the operator of any suspected illicit discharge. The summary must include: (i) the date that the suspected discharge was observed, reported or both; (ii) how the investigation was resolved, including any follow-up, and (iii) resolution of the investigation and the date the investigation was closed.*
 - i. See Attachment 11 for IDDE investigation spreadsheet.
- d. Status of compliance with permit conditions
 - i. The Town of Ashland is in compliance with all requirement of MCM3.
- e. BMP assessment
 - i. All outfalls were screened and no illicit discharge was detected.
 - ii. All illicit discharge discovered or reported were resolved as noted in item B.3.c above.
- f. Progress toward achieving measureable goal identified in the MS4 Program Plan:
 - i. Circulate 100 flyers dedicated to eliminating illicit/ unauthorized non-stormwater discharges to the general public and/or targeted businesses.
 - Addressed under item B.1
 - ii. Begin implementing the procedures to detect, identify, and address unauthorized non-stormwater discharges, including illegal dumping as outlined in the updated “unauthorized non-stormwater discharge detection and elimination procedures”. Keep records and report as specified.
 - See Attachment 10 for outfall screening information.
 - iii. Inspect the Town’s MS4 outfalls as outlined in the updated “unauthorized non-stormwater discharge detection and elimination procedures.” Keep records and report as specified.
 - Completed as described under item B.3.c.
 - iv. According to the Town’s Stormwater Pollution Prevention Employee Training Plan, training in the recognition and reporting of illicit discharges was required for applicable field personnel during this permit period. Some training was done prior to this reporting period. See Attachment 12 for the training plan and the list of individuals who received training. The following list shows applicable staff and the year they received training:
 - Building and Grounds: FY12-13
 - Public Works Engineering Staff: FY12-13
 - Deputy Zoning Administrator: FY14-15
 - Public Works Street Crew: FY12-13
 - Ashland Police Department: Fy13-14 and FY14-15

- v. The Town hired a contractor to flush and TV monitor selected storm sewers in Town. See Attachment 13 for list of storm sewers that were flushed and monitored.

4. MCM4 – Construction Site Storm Water Runoff Control

- a. Items relating to Permit Section II.B.4.f(1): *Total number of regulated land disturbing activities.*
 - i. During the reporting period, 5 land-disturbing permits and 17 “agreements in lieu of” were issued. The Town updated its “Agreement in Lieu of” form to include erosion and sediment control, water quality and stormwater management. See Attachment 14 for “Agreement in Lieu of”
- b. Items relating to Permit Section II.B.4.f(2): *Total number of acres disturbed.*
 - i. During the reporting period, 9.7 acres of land were disturbed for construction activities.
- c. Items relating to Permit Section II.B.4.f(3): *Total number of inspections conducted.*
 - i. During the reporting period, 722 inspection were preformed.
- d. Items relating to Permit Section II.B.4.f(4): *A summary of the enforcement actions taken, including the total number and type of enforcement actions taken during the reporting period.*
 - i. During the reporting period, 112 violations were noted on erosion and sediment control inspection reports, and 1 Notice to Comply was issued. No enforcement actions were taken. All issues were resolved prior to issuing Stop Work Orders or need for escalating enforcement actions.
- e. Status of compliance with permit conditions
 - i. The Town of Ashland is in compliance with all requirement of MCM4.
- f. BMP assessment
 - i. The Town’s procedures for addressing construction activities are adequate. The Town is exploring ways to streamline the assessment of fines. Although no fines were assessed during this permit period, the Town is aware that to fine violators of erosion and sediment control requirements is arduous. We are working with the Town Attorney to streamline the process.
- g. Progress toward achieving measureable goal identified in the MS4 Program Plan.
 - i. The following are items the Town committed to in its MS4 Program Plan, and how they were addressed.
 - Maintain a consistent E&S Program in accordance with DEQ.
 - The Town’s E&SC program is consistent with DEQ standards. From July 1, 2013, through June 30, 2014, the town permitted the following land disturbing activities:

Year	Number of Land Disturbing Permits	Number of Agreements in Lieu of E&S Plan	Acres Disturbed
July 1, 2014 – June 30, 2015	5	17	9.7

- Maintain VSMP General Construction Permit inspection program.

- The Town's VSMP General Construction Permit inspection program is consistent with the Virginia laws and regulations.
 - ii. According to the Town's Stormwater Pollution Prevention Employee Training Plan, the Town must ensure that applicable employees obtain the appropriate certifications as required under the Virginia Erosion and Sediment Control Law and its attendant regulations. See Attachment 12 for the training plan.
 - Applicable Staff:
 - Public Works Engineering Staff
 - The Town employees three Professional Engineers (PEs), who are exempt from this certification requirement. The Director of Public Works, who is a PE, is the Program Administrator. See Attachment 15 for copy of the Administrator certification.
 - The Town employs three inspectors. See Attachment 15 for copies of the Inspector certifications.
 - iii. Address items required under Section II B.4.e of the 2013 MS4 General Permit.
 - The Town's Construction Compliance and Enforcement Plan is available upon request.
5. MCM5 – Post-Construction Stormwater Management
- a. Items relating to Permit Section II.B.5.e: *Stormwater management facility tracking and reporting requirements. The operator shall maintain an updated database of all known operator-owned and privately-owned stormwater management facilities that discharge to the MS4. The database shall include the following:*
 - (1) *The stormwater management facility type;*
 - (2) *A general description of the facility's location, including the address or latitude and longitude;*
 - (3) *The acres treated by the facility, including total acres, as well as the breakdown of pervious and impervious acres;*
 - (4) *The date the facility was brought online (MM/YYYY). If the date is not known, the operator shall use June 30, 2005, as the date brought online for all previously existing stormwater management facilities;*
 - (5) *The sixth order hydrologic unit code (HUC) in which the stormwater management facility is located;*
 - (6) *The name of any impaired water segments within each HUC listed in the 2010 § 305(b)/303(d) Water Quality Assessment Integrated Report to which the stormwater management facility discharges;*
 - (7) *Whether the stormwater management facility is operator-owned or privately-owned;*
 - (8) *Whether a maintenance agreement exists if the stormwater management facility is privately owned; and*
 - (9) *The date of the operator's most recent inspection of the stormwater management facility.*

In addition, the operator shall annually track and report the total number of inspections completed and, when applicable, the number of enforcement actions taken to ensure long-term maintenance.

The operator shall submit an electronic database or spreadsheet of all stormwater management facilities brought online during each reporting year with the appropriate annual report. Upon such time as the department provides the operators access to a statewide web-based reporting electronic database or spreadsheet, the operator shall utilize such database to complete the pertinent reporting requirements of this state permit.

- i. The Town maintains a database to track stormwater management facilities that meets all the requirements above. Additional information is available upon request.
 - ii. The Town caused 28 sites with a total number of 48 BMPs to be inspected. See Attachment 16 for dates inspections were completed. Although repairs were required, no enforcement actions were necessary.
 - iii. Attachment 16 also shows all stormwater management facilities. Two new BMPs on two separate sites were added during the reporting period (highlighted on spreadsheet).
 - b. Status of compliance with permit conditions
 - i. The Town of Ashland is in compliance with all requirement of MCM5.
 - c. BMP assessment
 - i. This BMP has been shown to be effective as evidenced by number of inspections completed during the permit period. The Town has a staff position assigned to administer the BMP inspection tracking database.
 - d. Progress toward achieving measureable goal identified in the MS4 Program Plan:
 - i. Continue tracking existing BMPs and enforcing inspection requirements.
 - See item B.5.a above.
 - ii. Catalog operations and maintenance plans for LIDs to distribute to developers.
 - With the advent of the BMP Clearinghouse, this is not necessary.
 - iii. Inspect Town owned BMPs in accordance with the “Town’s BMP Standard Operating Procedures”. Perform maintenance as needed.
 - Inspections were preformed during the permit period. See Attachment 17 for inspection reports.
 - Maintenance is underway.
6. MCM6 – Pollution Prevention/Good Housekeeping for Municipal Operations
- a. Items relating to Permit Section II.B.6.g(1): *A summary report on the development and implementation of the daily operational procedures.*
 - i. See Attachment 12 for the Training Plan, training attendees and the training slide show for housekeeping.
 - ii. See Attachment 18 for written procedures.
 - b. Items relating to Permit Section II.B.6.g(2): *A summary report on the development and implementation of the required SWPPPs.*

- i. The Town is developing a SWPPP for its maintenance facility, which will be in effect during the 3rd permit year (FY15-16).
- c. Items relating to Permit Section II.B.6.g(3): *A summary report on the development and implementation of the turf and landscape nutrient management plans that includes:*
 - (a) *The total acreage of lands where turf and landscape nutrient management plans are required; and*
 - (b) *The acreage of lands upon which turf and landscape nutrient management plans have been implemented.*
 - i. This is not required because the Town does not manage turf and landscaping that meets requirements in the 2013 MS4 General Permit.
- d. Items relating to Permit Section II.B.6.g(4): *A summary report on the required training, including a list of training events, the training date, the number of employees attending training and the objective of the training.*
 - i. The Town's training plan is included in Attachment 12. No trainings were required for this permit year. Next training is scheduled for permit year 3.
- e. Status of compliance with permit conditions.
 - i. The Town of Ashland is in compliance with all requirement of MCM6.
- f. BMP assessment
 - i. Through the Town's training program, awareness of pollution prevention and housekeeping has been raised for Town shop staff.
 - ii. A SWPP document to further assure pollution prevention and good housekeeping practices is in the works.
- g. Progress toward achieving measureable goal identified in the MS4 Program Plan
 - i. Continue program to keep records of the maintenance program activities at the Town Maintenance Facility.
 - See Attachment 19 for Town Shop maintenance records. These include:
 - Street Sweeping
 - Used oil and antifreeze recycling
 - Sand interceptor inspections
 - Oil-water separator inspections
 - Disposal of material removed from sand interceptor
 - Disposal for material removed from oil-water separator
 - iv. According to the Town's Stormwater Pollution Prevention Employee Training Plan, training in good housekeeping and pollution prevention practices to be employed during road, street, and parking lot maintenance was required for applicable field personnel during this permit period. See Attachment 12 for the training plan and the list of individuals who received training. The following list shows applicable staff and the year they received training:
 - Building and Grounds: FY14-15
 - Public Works Engineering Staff: FY14-15
 - Public Works Street Crew: FY14-15

- v. According to the Town's Stormwater Pollution Prevention Employee Training Plan, training in good housekeeping and pollution prevention practices to be employed in and around maintenance and public works facilities was required for applicable field personnel during this permit period. See Attachment 12 for the training plan and the list of individuals who received training. The following list shows applicable staff and the year they received training:
 - Building and Grounds: FY14-15
 - Public Works Engineering Staff: FY14-15
 - Public Works Street Crew: FY14-15
 - vi. According to the Town's Stormwater Pollution Prevention Employee Training Plan, training in good housekeeping and pollution prevention practices to be employed in and around maintenance and public works facilities was required for applicable field personnel during this permit period. See Attachment 12 for the training plan and the list of individuals who received training. The following list shows applicable staff and the year they received training:
 - Building and Grounds: FY14-15
 - Public Works Engineering Staff: FY14-15
 - Public Works Street Crew: FY14-15
 - vii. According to the Town's Stormwater Pollution Prevention Employee Training Plan, pesticide operators to become certified through the Virginia Department of Agriculture and Consumer Services (VDACS) during this permit period. See Attachment 12 for the training plan and documentation of certification. The following list shows applicable staff and the year they received training:
 - Building and Grounds: FY14-15
7. MCM7 – Mechumps Creek TMDL for E. coli
- a. Update MS4 Program to with new information on TMDL, if necessary.
 - i. Not necessary during this reporting period.
 - b. Continue public education program about picking up after pets.
 - i. See Attachment 2 for flyers and brochures.
 - ii. See Attachment 3 for TV slides
 - iii. The Town posted on website and Facebook page the link to video about picking up after pets: <https://www.youtube.com/watch?v=jDh12w-jcfs>.
 - c. Continue investigating sources of E. coli bacteria.
 - i. The Town samples quarterly. Attachment 19 contains sampling results for the permit period.
 - ii. Through the sampling protocol, the Town tracked down the probable source of high concentrations of e. coli. The Town collaborated with the property owner of the Ashland Towne Center shopping center to video the sanitary sewer line. A break was confirmed and repair were made. The sampling event following this repair showed significant decrease in e. coli concentrations.

- d. Estimate volume of stormwater and the quantity of E. coli discharged to Mechumps Creek.
- A total of 46.3” of precipitation was recorded at the Town Hall during the reporting cycle. The drainage area to Mechumps Creek, which includes Slayden Creek and Mechumps Creek, is approximately 1,880 Acres. The estimated total precipitation over this area is 3.16×10^8 C.F. Runoff is estimated to be 45% of the precipitation. Therefore, 1.42×10^8 C.F. of runoff entered Mechumps Creek. See Attachment 19.
 - The Town of Ashland collected samples from the north, middle and south branches of Mechumps Creek during the reporting period. The concentrations from the sampling events were averaged. The approximated concentration of E. coli bacteria and the approximated runoff volume were used to calculate an approximated amount of E. coli bacteria entering Mechumps Creek: 1.20×10^{13} cfu/year for the reporting period, which is lower than the Total Maximum Daily Load (TMDL) of 3.16×10^{13} cfu/yr and the non-point source Load Allocation (LA) of 3.06×10^{13} cfu/yr. The method of calculation used, assumes that e. coli is transported to the stream by stormwater runoff. The Town will continue to monitor. See Attachment 19.

C. Results of information collected and analyzed, including monitoring data, if any, during the reporting period.

The information collected during this permit year includes:

- BMP Inspection (see Item 5)
 - Street Sweeping (see Item 6)
 - Maintenance Records (see Item 6)
 - Sampling data for Mechumps Creek TMDL (see Item 7)
 - Tracking of IDDE Enforcement Activities (see Item 3)
- D. The Town updates its MS4 Program Plan in accordance with the 2013 MS4 General Permit during the next reporting cycle. Additional activities to undertake during the next reporting cycle are summarized as follows:
- Public Education and Outreach on Storm Water Impacts
 - Target an area of approximately 20% of residences in the Town to distribute flyer regarding proper pet waste disposal. Continue to post information regarding pet waste disposal on the Town’s website, TV station and social media pages.
 - Target an area of approximately 20% of residences, apartment complex owners or rental agents, and homeowner association presidents in the Town to distribute flyer regarding environmentally friendly yard care. Continue to post information regarding lawn/yard care on the Town’s website, TV station and social media pages. Meet with homeowner associations if appropriate.
 - Target 25% of restaurants to distribute flyer regarding proper disposal of cooking waste. Continue to post information regarding disposal of kitchen waste on the Town’s website, TV station and social media pages.

- Target all auto parts stores to distribute flyer regarding proper disposal of automotive fluids. Continue to post information regarding disposal of automotive fluids on the Town's website, TV station and social media pages.
- Air 4 seasonal slides on the Town's public television station.
- Articles on stormwater pollution prevention on Town website and social media. At least one each quarter.
- Continue to collaborate with RMC on Mechumps Creek Restoration project. Continue to publicize the project.
- Continue to educate property owners in CBPAs of the Town's requirements for septic tank maintenance.
- Public Involvement/Participation
 - Continue communication and collaboration with Randolph Macon College (RMC).
 - Work with volunteer group to mark or stencil stormwater inlets.
 - Make presentations on Stormwater Pollution Prevention to Elementary school classes.
 - Provide Elementary Schools with educational material for Stormwater Pollution Prevention.
 - Provide for the Town's Chesapeake Bay TMDL Action Plan.
- Illicit Discharge Detection and Elimination
 - Continue implementing the procedures to detect, identify, and address unauthorized non-stormwater discharges, including illegal dumping as outlined in the updated "unauthorized non-stormwater discharge detection and elimination procedures". Keep records and report as specified.
 - Inspect the Town's MS4 outfalls as outlined in the updated "unauthorized non-stormwater discharge detection and elimination procedures." Keep records and report as specified.
- Construction Site Storm Water Runoff Control
 - Maintain a consistent E&S Program in accordance with DEQ.
 - Maintain VSMP General Construction Permit inspection program.
- Post-Construction Storm Water Management in New Development and Redevelopment
 - Continue tracking existing BMPs and enforcing inspection requirements.
 - Complete maintenance of Town owned BMPs.
- Pollution Prevention/Good Housekeeping for Municipal Operations
 - Continue program to keep records of the maintenance program activities at the Town Maintenance Facility.
 - Continue training staff as outlined in the Town's Employee Training Plan.
- Mechumps Creek TMDL for E. coli
 - Update MS4 Program to with new information on TMDL, if necessary.
 - Continue public education program about picking up after pets.
 - Continue investigating sources of E. coli bacteria.
 - Estimate volume of stormwater and the quantity of E. coli discharged to Mechumps Creek.

E. A change in any identified best management practices or measurable goals for any of the minimum control measures including steps to be taken to address any deficiencies.

- Changes from the BMPs proposed in the June 30, 2014, update of the MS4 Program plan are:
 - The program plan was updated to comply with the 2013 MS4 General Permit. The new program plan is dated June 30, 2015. See Attachment 21. In particular the following items were added:
 - ✓ Minimum Control Measure 4 - Construction Site Stormwater Runoff Control Stormwater Management Progressive Compliance and Enforcement (Section II.B.4)
 - ✓ Minimum Control Measure 6 – Pollution Prevention/Good Housekeeping for Municipal Operations – Daily Good Housekeeping Procedures (Section II.B.6.a)
 - The Town posted educational videos instead of brochures on its website and Facebook page.
 - The Town began a retrofit project at the Ashland Police Department that includes permeable pavers and a stream restoration.

- F. The Town of Ashland does not rely on another government entity to satisfy some of the permit obligations. However, Hanover County Department of Public Utilities manages the sanitary sewer in the Town, and collaborates with the Town on issues regarding sanitary sewer.

- G. Not applicable.

- H. Information required for any applicable TMDL special condition contained in Section I of the general permit.
 - See Attachment 22 for the Mechumps Creek TMDL Action Plan for E. Coli Bacteria.

 - See Attachment 23 for the Chesapeake Bay TMDL Action Plan.

 - There is not any new information on the TMDL or WLA, which are shown in the following table. However, the Town is continuing its effort to track the source of E. coli in Mechumps Creek. Town staff collected wet and dry weather samples and tested for E. coli.

 - The Town, in collaboration with R-MC, has completed a design for a stream restoration on the reach of Mechumps Creek between Hill Carter Parkway and I-95. We have been applying for grants for construction.

 - The Town was awarded funding through a DEQ SLAF Grant and NFWF for design and construction of a permeable parking lot at the Ashland Police Department and restoration of the stream adjacent to the parking lot. Construction began during the reporting period, and will be completed during the third permit year. This stream restoration will improve the water quality in Mechumps Creek.

- The Town and RM-C continue to provide bags at the Town parks, the R-MC campus and other locations for pet owners to pick up after their pets. Educational signs are in place at the bag dispensers to inform the public on the importance of picking up after pets.

Mechumps Creek TMDL for E. coli

Segment	Parameter	TMDL (cfu/yr)	WLA (cfu/yr)	LA (cfu/yr)	MOS
Mechumps Creek	E. Coli	3.16E+13	9.86E+11	3.06E+13	Implicit

- A total of 46.3” of precipitation was recorded at the Town Hall during the reporting cycle. The drainage area to Mechumps Creek, which includes Slayden Creek and Mechumps Creek, is approximately 1,880 Acres. The estimated total precipitation over this area is 3.16×10^8 C.F. Runoff is estimated to be 45% of the precipitation. Therefore, 1.42×10^8 C.F. of runoff entered Mechumps Creek. The approximate quantity of E. coli that entered Mechumps Creek was calculated to be 6.40×10^{12} cfu/year for the reporting period, which is lower than the TMDL.

I. Signed certification statement follows the cover letter preceding this report.

Attachments: Copies of documents and samples of literature are attached as follows:

- Attachment 1: Town of Ashland MS4 Public Education and Outreach Plan
- Attachment 2: Pollution Prevention and Illicit Discharge Detection and Elimination (IDDE) Flyers
- Attachment 3: Stormwater TV Slides
- Attachment 4: Stormwater Management pages from Town Website
- Attachment 5: Press Release for Ashland Police Department Stormwater Retrofit Project
- Attachment 6: Maintenance Requirement for Septic Tanks in CBPAs Information and Tracking
- Attachment 7: Town of Ashland Presentations at Various Events
- Attachment 8: Public Participation Documentation
- Attachment 9: Information on Public Comment Received
- Attachment 10: Table of MS4 Outfalls and Outfall Screening Forms
- Attachment 11: Town of Ashland IDDE Tracking Spreadsheet
- Attachment 12: Employee Training Plan, Sign-in Sheet, and Training Presentations
- Attachment 13: List of Storm Sewers Pipes Flushed and TV Monitored
- Attachment 14: Town of Ashland Agreement in Lieu of Erosion and Sediment Control, Water Quality and Stormwater Management
- Attachment 15: Erosion and Sediment Control Staff Certification Documentation
- Attachment 16: List of BMPs in Database
- Attachment 17: Inspection Records for Town-owned BMPs
- Attachment 18: Written Procedures for Housekeeping and Pollution Prevention
- Attachment 19: Town Shop Maintenance Records
- Attachment 20: E. Coli Sampling Results and Summary
- Attachment 21: Updated MS4 Program Plan
- Attachment 22: Mechumps Creek TMDL Action Plan for E. Coli
- Attachment 23: Chesapeake Bay TMDL Action Plan