

**Middle Pamunkey River  
Bacteria Total Maximum Daily Load (TMDL)  
Action Plan  
Town of Ashland  
Permit No. VAR040011  
July 2021**

1. **The TMDL project name** (*General Permit Part II B 3 (a)*):

E.coli TMDL Development for The Pamunkey River and Tributaries

2. **The EPA approval date of the TMDL** (*General Permit Part II B 3 (b)*):

– EPA approval 4/27/2015, SWCB approval 12/11/2014

3. **The wasteload allocated to the permittee** (*General Permit Part II B 3 (c)*):

The final average **annual** in-stream *E. coli* bacterial load modeled after TMDL allocation in the Middle Pamunkey River TMDL watershed unit, aggregated with Hanover County, Town of Ashland, and VDOT in Hanover County is 1.83E+12 cfu/yr.

The final average **daily** in-stream *E. coli* bacterial load modeled after TMDL allocation in the Middle Pamunkey River TMDL watershed unit, aggregated with Hanover County, Town of Ashland, and VDOT in Hanover County is 5.00E+09 cfu/day.

4. **Identification of the significant sources of the pollutants of concern discharging to the permittee's MS4 and that are not covered under a separate VPDES permit. For the purposes of this requirement, a significant source of pollutants means a discharge where the expected pollutant loading is greater than the average pollutant loading for the land use identified in the TMDL** (*General Permit Part II B 3 (d)*):

- Residential street run off to MS4 from areas where pet owners walk dogs.
- Although the sanitary sewer system is owned by Hanover County Department of Public Utilities (DPU) and not owned by the Town of Ashland, leaking sanitary sewers are potential significant sources.
- Direct and indirect wildlife sources.

5. **Management practices and strategies used to reduce the pollutants of concern.** (*General Permit Part II B 3 (e)*):

- Education and outreach programs (dog waste disposal, stormwater pollution prevention) have been implemented and are ongoing.
  - Provide signage to pick up dog waste, provide pet waste bags and disposal containers.

- Collaborate with partners (Randolph-Macon College, civic and youth groups, etc.) on outreach opportunities.
- A program of flushing of Town owned stormwater pipes has been implemented and is ongoing
  - Clean out storm drains to remove waste from urban wildlife
- A program of TV Monitoring of storm sewer pipes has been implemented and is ongoing
  - Look for potential inflow through cracks or joins from potential bacterial sources
  - Look for cross connections.
- Low Impact Design (LID) Town projects implemented in the Mechumps Creek watershed:
  - College Park: Permeable Paver & Rain Garden Treatment Train
  - Ashland Police Department: Permeable Pavers
  - Railroad Avenue Streetscape Phase II: Permeable Pavers
- Stream Restoration projects implemented by the Town in the Mechumps Creek watershed:
  - Mechumps Creek Phase I
  - Mechumps Creek by Ashland Police Department
  - Mechumps Creek Phase II
- Retrofit projects implemented by the Town in the Mechumps Creek watershed:
  - New Extended Detention Basins at Town's Maintenance Facility on Vaughan Road
- Street Sweeping has been implemented and is ongoing.
- State law requires that septic tanks located in a Chesapeake Bay Preservation Area be pumped out at least once every 5 years. The Town of Ashland sends reminders to residents with septic tanks reminding them that they need to be pumped out every 5 years.
- As mentioned earlier, Hanover County DPU owns the sanitary sewer system in the Town. The Hanover DPU maintains "on-call" capabilities and strives for a response time of no more than one hour. On-call DPU staff responds to all utility related issues including sanitary sewer overflows (SSO)s and pump station alarms to effectively minimize the length of SSO events.

Hanover County provides regular funding via its Capital Improvement Program and Operation & Maintenance budgets for sewer rehabilitation with the goals of extending asset life and minimizing the risk of SSO events.
- Ashland maintains a list of legal authorities aimed at reducing the pollutant identified in the WLA. Applicable ordinances include Chapter 4.1(Virginia code §§ 62.1-44.15:24) – Environmental Protection and Chapter 5 – Erosion and Sediment Control (Virginia code §§ 21-89.1—21-89.15).

Ashland received VSMP program approval from DEQ on July 1, 2013, and maintains a compliant Municipal Separate Storm Sewer System (MS4) Permit (VAR040011).

**6. Any calculations required in accordance with management practices and strategies.**  
*(General Permit Part II B 3 (f)):*

- Calculations are not currently required.
- Town collects and test water samples from Mechumps Creek for e. coli for screening purposes and calculates the average annual load of e. coli to the creek.

**7. Outreach strategy to enhance the public's education (including employees) on methods to eliminate and reduce discharges of the pollutants** *(General Permit Part II B 3 (g)):*

- Stormwater management and educational materials on Town website
- Public Outreach projects to involve residents in the public education process
  - Creating community videos about picking up after your pet
  - Painting stormwater inlets with pollution prevention designs
- Circulate fliers or post on social media quarterly on stormwater pollution prevention and pet waste cleanup.
- The Town coordinates with Randolph-Macon College annually on Macon a Difference Day (MaDD) for Earth Day. Randolph Macon College students volunteer, participate and engage the community in various activities such as:
  - stream cleanup,
  - storm drain marking,
  - circulate education fliers
  - demonstrate how to make rain barrels
  - BMP maintenance
  - installing and restocking pet waste stations
  - clean up litter in parks
  - and other water pollution prevention awareness activities
- Employee Training: Town staff trained on Illicit Discharge, Detection, and Elimination in accordance with the Town’s Stormwater Pollution Prevention Employee Training Plan dated June 2014.
- Employee Training: Town staff trained on Good Housekeeping procedures in accordance with the Town’s Stormwater Pollution Prevention Employee Training Plan dated June 2014.
- Town of Ashland Public Education and Outreach Plan.

**8. A schedule of anticipated actions planned for implementation during this permit term** *(General Permit Part II B 3 (h)).*

<b>Practices</b>	<b>Implementation</b>	<b>Milestone</b>
Education and outreach	On-going	Continuous
Pet waste disposal education	On-going	Continuous

Illicit discharge, detection, and elimination monitoring	On-going	Continuous
Storm sewer pipe flushing	On-going	Continuous
Storm sewer pipe TV inspections	On-going	Continuous
College Park: Permeable Paver & Rain Garden Treatment Train	Completed	--
Ashland Police Department: Permeable Pavers	Completed	--
Railroad Avenue Streetscape Phase II: Permeable Pavers	Completed	--
Mechumps Creek Phase I Stream Restoration	Completed	--
Mechumps Creek Stream Restoration by Ashland Police Department	Completed	--
Mechumps Creek Phase II Stream Restoration	Completed	--
Used Grant Award from Chesapeake Bay License Plate Fund to Create Several Educational Music Videos to Remind Residents to Pick Up After Their Dogs.	Completed	--
Coordinated with Local Summer Art Camp to Paint Pollution Prevention Designs on Stormwater Inlets	Completed	--
Coordination with Girl Scout Troop to Paint Pollution Prevention Designs on Stormwater Inlets	On-going	--
Street sweeping	On-going	Continuous
Septic System Pump-outs, Maintenance Every 5 Years	On-going	Continuous
Employee training	On-going	Continuous
Town Code, Chapters 4 and 5 updates	Completed	--
MS4 Permit VAR040011 compliance	On-going	Per Requirements

9. **Provide an opportunity for public comment proposed on the local TMDL action plan. Prior to submittal of the action plan required in General Permit Part II B 1, the permittee shall provide an opportunity for public comment proposed to meet the local TMDL action plan requirements for no less than 15 days. (General Permit Part II B 7)**

The draft Pamunkey River and Tributaries TMDL Action Plan will be posted on the Town’s website for public comment for 15 days. At the conclusion of the 15 days, comments received will be taken into consideration when developing the final version of the Action Plan. The Town will continue to post the Action Plan on the website, and will give consideration to any further comments received.