

MS4 Program Plan

MS4 General Permit 2018-2023

**For the
Town of Ashland, Virginia**

April 30, 2019

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SECTION 1
MS4 PROGRAM PLAN

1.1 General

A. The Town's MS4 Program Plan is hereby updated for the 2018 General Permit. As part of the update, the following items are included in this document, incorporated by reference, or will be developed during the permit cycle if applicable:

- a. A list of the applicable legal authorities such as ordinance, state and other permits, orders, specific contract language, and interjurisdictional agreements to ensure compliance with the minimum control measures in Part I.E of the 2018 MS4 General Permit related to post-construction stormwater management in new development and development on prior developed lands;
- b. Written policies and procedures utilized to ensure that stormwater management facilities are designed and installed in accordance with Part I.B of the 2018 MS4 General Permit;
- c. Written procedures for inspection, compliance and enforcement to ensure maintenance is conducted on private stormwater facilities to ensure long-term operation in accordance with approved design;
- d. Written procedures for inspection and maintenance of Town-owned stormwater management facilities;
- e. The roles and responsibilities of each of the Town's departments, divisions, or subdivisions in implementing the minimum control measure in Part I.E related to post-construction stormwater management in new development and development on prior developed lands.

B. Documents for BMP Implementation

1. The following is a list of existing policies, ordinances, schedules, inspection forms, and written procedures necessary for BMP implementation:

- a. Environmental Protection Ordinance, Chapter 4.1
 - i. Stormwater Management Ordinance
 - ii. Chesapeake Bay Preservation Areas
 - iii. Water Quality Protection
 - iv. Municipal Separate Storm Sewer System (addresses illicit discharges)
- b. Erosion and Sediment Control Ordinance, Chapter 5
- c. Subdivision of Land Ordinance, Chapter 17
- d. Zoning Ordinance, Chapter 21
- e. Agreement in Lieu of Erosion and Sediment Control Plan for single family residential construction
- f. Agreement in Lieu of Water Quality Plan for single family residential construction
- g. Erosion and Sediment Control Inspection Report
- h. Erosion and Sediment Control Bonds/Letters of Credit
- i. Land Disturbing Permit
- j. BMP Maintenance Agreement

2. The Town of Ashland Department of Public Works is responsible for implementing the BMPs.

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1.2 Seven Minimum Control Measures Required by MS4 Phase II

The seven minimum control measures included in this MS4 Program Plan, are as follows:

- A. Public Education and Outreach
- B. Public Involvement and Participation
- C. Illicit Discharge Detection and Elimination
- D. Construction Site Storm Water Runoff Control
- E. Post-Construction Storm Water Management in New Development and Redevelopment
- F. Pollution Prevention and Good Housekeeping for Facilities Owned or Operated by the Permittee Within the MS4 Service Area
- G. Mechumps Creek TMDL for E. coli

In addition, the Town will also address the following items as part of this Program Plan.

- H. E. coli TMDL Development for The Pamunkey River and Tributaries Action Plan
- I. Chesapeake Bay TMDL Action Plan
- J. Chickahominy River and Tributaries TMDL Action Plan

This section details how the town of Ashland will address these minimum control measures and describes BMPs, measurable goals and target dates.

A. Public Education and Outreach

1. Specific Requirements

- a. *The permittee shall implement a public education and outreach program designed to: (1) Increase the public's knowledge of how to reduce stormwater pollution, placing priority on reducing impacts to impaired waters and other local water pollution concerns; (2) Increase the public's knowledge of hazards associated with illegal discharges and improper disposal of waste, including pertinent legal implications; and (3) Implement a diverse program with strategies that are targeted toward individuals or groups most likely to have significant stormwater impacts.*
- b. *The permittee shall identify no less than three high-priority stormwater issues to meet this goal of educating the public in accordance with Part I E.1.a [in the 2018 MS4 General Permit]. High-priority issues may include the following examples: Chesapeake Bay nutrients, pet wastes, local receiving water impairments, TMDLs, high-quality receiving waters, and illicit discharges from commercial sites.*
- c. *The high-priority public education and outreach program, as a whole, shall: (1) Clearly identify the high-priority stormwater issues; (2) Explain the importance of the high-priority stormwater issues; (3) Include measures or actions the public can take to minimize the impact of the high-priority stormwater issues; and (4) Provide a contact and telephone number, website, or location where the public can find out more information.*

- d. *The permittee shall use two or more of the strategies listed in Table 1 [in the 2018 MS4 General Permit] per year to communicate to the public the high-priority stormwater issues including how to reduce stormwater pollution.*
 - e. *The permittee may coordinate its public education and outreach efforts with other MS4 permittees; however, each permittee shall be individually responsible for meeting all of its state permit requirements.*
 - f. *The MS4 program plan shall include: (1) A list of the high-priority stormwater issues the permittee will communicate to the public as part of the public education and outreach program; (2) The rationale for selection of each high-priority stormwater issue and an explanation of how each education or outreach strategy is intended to have a positive impact on stormwater discharges; (3) Identification of the public audience to receive each high-priority stormwater message; (4) The strategies from Table 1 of Part I.E.1.d to be used to communicate each high-priority stormwater message; and (5) The anticipated time periods the messages will be communicated or made available to the public.*
2. For this minimum control measure, the Town proposes to use the following BMPs and strategies.
- a. High-priority stormwater issues
 - i. Pet waste
 - ii. Chesapeake Bay nutrients as found in lawn and yard care products
 - iii. Unauthorized discharges to MS4
 - b. Rationale for selection
 - i. Pet waste: E. coli bacteria has been detected in Ashland Streams. The Town is named as responsible party on two e. coli TMDLs: Mechumps Creek and Stony Run. Pet waste is a typical source of e. coli bacteria. Although pet waste may not be the only source of bacteria in the streams, it is certainly a contributor.
 - ii. Lawn and yard care: Throughout the Chesapeake Bay watershed, lawn care chemicals contribute to nutrients in the Bay. Nitrogen and Phosphorus, which are Chesapeake Bay TMDL pollutants are significant components of lawn care products. Fertilizer, herbicides and pesticides applied excessively or at the wrong time can easily wash off the lawn or garden into storm drains and flow into surface water. Elevated levels of these items are harmful to local surface waters as well as the Chesapeake Bay.
 - iii. Unauthorized discharges to MS4: Not all citizens and business owners know what is allowed and what is not allowed to be discharged to the Town's MS4. The unauthorized discharges that Town has previously identified and corrected include: cooking grease dumped from restaurants, unapproved car washing operations, leaking sewers, dumping motor oil/fluids, dumping pet waste, dumping trash etc.
 - c. Identification of the public audience to receive each high-priority stormwater message
 - i. Pet waste
 - (a) Dog owners; population size: Based on the number of dog licenses issued in the Town of Ashland, there are more than 500 dogs in the Town. However, based on research statistics from the American Veterinary Medical Association the dog population in a community with Ashland's population of 7,225 people should be approximately 1,623 dogs. Because so many dogs are not licensed, it is reasonable to target the entire population of the Ashland with messages for dog owner to assure than none are missed.

- (b) Lawn and yard care: The Town will focus on the following populations:
 - (i) Households and homeowner associations: population size: 2,626
 - (ii) Apartment Complexes, Townhomes, etc.; population size: 8 apartment complexes, 3 townhouse/condo complexes, 2 mobile home parks.
- (c) Unauthorized Discharges to MS4
 - (i) Although civic groups holding fundraiser carwashes is no longer considered unauthorize, the Town wishes to reach out to such groups to maximize their pollution prevention efforts; population size: 14 Churches, 1 High School, 1 Middle School, 1 College, estimated 5 youth organizations (e.g. Girl Scouts, Boy Scouts).
 - (ii) Restaurant; population size: approximately 40
 - (iii) Auto Parts Retailers; population size: 5
- d. The Town will make these educations efforts to encourage the public to take measures or actions to minimize the impact of these high-priority stormwater issues.
 - i. Pet waste
 - (a) Dog owners
 - (i) Message: Pick up after your pet. Dispose of pet waste appropriately. Never place pet waste in a stormwater inlet/storm sewer system, a ditch or a stream. Place pet waste in a trash receptacle or flush down the toilet.
 - ii. Lawn and Yard Care
 - (a) Households, homeowner associations, apartment complexes, and townhomes
 - (i) Message/actions: Minimize fertilizers, herbicides and pesticides; leave grass clippings on lawn or make accessible for Town pick up; do not put leaves or grass clippings in ditch or street except during leaf pick-up season; never put leaves in the storm sewer.
 - iii. Unauthorized Discharges to MS4
 - (a) Charity groups holding carwashes;
 - (i) Message/actions: If a group obtains a permit from the Town and utilizes the Town of Ashland's Wash Water Collection System, then the Town will promote the group's event on the Town's social media. The group will receive training from Town staff who will designate a location that will not drain to the storm sewer; use phosphorus-free, non-toxic, biodegradable, non-acidic products; minimize use of water; contain spills.
 - (b) Restaurants;
 - (i) Message: Dispose of waste cooking oils and other wastes appropriately. Never dispose of kitchen/cooking waste in a storm drain.
 - (c) Auto Parts Retailer;
 - (i) Message: The message will be directed to customers: Dispose of automotive fluids properly.
- e. Strategies for public education and outreach
 - i. Training Programs and Materials
 - (a) The Town distributes information regarding proper erosion and sediment control measures. This information is given to contractors at the pre-construction meeting required by the Town.
 - (b) The Town implements and will continue its training program for Operations Staff (Street, Building and Grounds, Equipment Maintenance), Deputy Zoning Administrator, and Ashland Police Department on identifying and addressing illicit discharge.

- (c) The Town implements and will continue its training program for Operations Staff (Street, Building and Grounds, Equipment Maintenance) on good housekeeping for pollution prevention.
- (d) The Town includes and will continue to include information on septic tank maintenance for property owners in Chesapeake Bay Preservation Areas on the Town's website.

ii. Mailings

- (a) The Town sends letters to remind property owners with septic tanks of requirements for septic tank maintenance and septic tank pump-out. The Town maintains a list of residents with septic tanks and sends reminders to them that they need to pump out their tanks every 5 years.

iii. Signage: Messages presented by signage, by their nature, are continuously available to the public.

- (a) The Town uses and will continue to use signage installed at the pet waste bag dispenser stations located near parks and walking trails in the Town to prominently place the message, "Pick up after your pet. Dispose of pet waste appropriately. Never place pet waste in a stormwater inlet/storm sewer system, a ditch or a stream. Place pet waste in a trash receptacle or flush down the toilet."
- (b) The Town uses and will continue to use prominently displayed educational signs at municipally owned or implemented stormwater management facilities. These include bioretention areas, permeable pavers and stream restoration projects. This will include an upcoming rain garden that will be constructed with collaboration with a Girl Scout Troop. These signs enable the Town to explain how stormwater pollution makes its way to natural waters including the Chesapeake Bay as well as how the pollution may be prevented. The signs also educate the public on the various methods used to manage/mitigate stormwater pollution, and how some of them may be implemented at private residences.
- (c) Storm drain stenciling: The Town will continue to recruit volunteer organizations and Randolph-Macon College student to mark stormwater inlets with the message that anything dumped in the inlet will drain the surface waters (including the Chesapeake Bay) without treatment.
- (d)

iv. Media Materials

- (a) The Town occasionally holds public information sessions related to stormwater projects or education. These sessions are announced on the Town's website and social media sites, and sometimes run on the public access television station. These information sessions are not regularly scheduled.
- (b) The Town runs stormwater pollution prevention educational slides on its public access television station. These slides are updated each quarter for the appropriate season and are aired frequently throughout the day.
- (c) The Town maintains a Stormwater Management page on its website. It includes information on the Town's MS4 permit, stormwater pollution prevention projects implemented by the Town, and how residents and businesses can reduce stormwater pollution. It also contains links to DEQ and EPA websites, allows residents to download educational brochures, and provides opportunity for residents to report concerns about potential stormwater pollution or illicit discharges. The Town will continue to update its

website and maintain the most current information on stormwater management.

- (d) The Town collaborates with Hanover County to publish educational messages in a widely distributed newspaper and newsletter: Ashland-Hanover Local and Hanover Review. Stormwater pollution prevention messages are included 2 to 3 times per year.
- (e) Each quarter, the Town updates posts and will continue to post educational information on social media (Facebook, Twitter, Instagram): disposing of pet-waste, applying lawn-chemicals, washing cars, changing motor-oil and proper disposal of used motor oil, disposing leftover paint and household chemicals, and illicit discharges, etc.
- (f)

v. Alternative Materials

- (a) The Town has received grants, and plans to apply for future grants, from the Chesapeake Bay Restoration Fund to purchase educational material such as pet waste bag dispensers with educational information. These types of educational material are given out at Town events and are available for free to all who visit Town Hall.
- f. The Town and Randolph-Macon College (R-MC) collaborated on two stream restoration projects for Mechumps Creek, which had been degraded due to historically uncontrolled stormwater runoff. These projects continue to provide opportunities to educate the public on stormwater pollution and how it may be mitigated. The Town and R-MC will continue to write articles, make presentations, encourage press interest, etc., regarding these projects. The Town will also collaborate with R-MC to install informational signs for the Phase 2 project.
 - g. Public Schools in the Town of Ashland are run by Hanover County. The County implements a “Watershed Education for Students” program. The County coordinates with the Hanover-Caroline Soil and Water Conservation District to provide a meaningful watershed experience for Hanover County Students. The Town supports this effort and may participate if requested.

3. Measurable goals and target dates are listed in the chart below:

Compliance Period	Measurable Goals
Year 1 2018-2019	<ul style="list-style-type: none"> ○ Identify no less than three high-priority stormwater issues to meet the goal of educating the public how to reduce stormwater pollution, increase the public's knowledge of hazards associated with illegal discharges and improper disposal of waste, and implement a diverse program with strategies that are targeted toward individuals or groups most likely to have significant stormwater impacts. ○ Coordinate with volunteers to for stormwater inlet stenciling. ○ Air 4 seasonal slides on the Town’s public television station. ○ Post information on Town’s website regarding maintenance requirements for owner of septic tanks in CBPAs. ○ Post information on the Town’s website and social media that raise awareness regarding stormwater management issues. ○ Apply for a grant from the Chesapeake Bay Restoration Fund for funds to obtain items such as individual pet waste bag

Compliance Period	Measurable Goals
	<p>dispenser with the Town's logo and the message to pick up after your pet on it.</p> <ul style="list-style-type: none"> ○ Collaborate with R-MC to design an educational sign to install near the Mechumps Creek Phase II Restoration Project.
<p>Year 2 2019-2020</p>	<ul style="list-style-type: none"> ○ Continue to address educational goals for high priority stormwater issues to reduce stormwater pollution, increase the public's knowledge of hazards associated with illegal discharges and improper disposal of waste, and implement a diverse program with strategies that are targeted toward individuals or groups most likely to have significant stormwater impacts. ○ Coordinate with volunteers to for more stormwater inlet stenciling if necessary. ○ Air 4 seasonal slides on the Town's public television station. ○ Post information on Town's website regarding maintenance requirements for owner of septic tanks in CBPAs. ○ Post information on the Town's website and social media that raise awareness regarding stormwater management issues. ○ Raise funds and/or budget for purchasing an educational sign to install near the Mechumps Creek Phase II Restoration Project.
<p>Year 3 2020-2021</p>	<ul style="list-style-type: none"> ○ Continue to address educational goals for high priority stormwater issues to reduce stormwater pollution, increase the public's knowledge of hazards associated with illegal discharges and improper disposal of waste, and implement a diverse program with strategies that are targeted toward individuals or groups most likely to have significant stormwater impacts. ○ Coordinate with volunteers to for more stormwater inlet stenciling if necessary. ○ Air 4 seasonal slides on the Town's public television station. ○ Post information on Town's website regarding maintenance requirements for owner of septic tanks in CBPAs. ○ Post information on the Town's website and social media that raise awareness regarding stormwater management issues. ○ Install educational signs near the Mechumps Creek Phase II Restoration Project. ○ May be update before June 1, 2020.
<p>Year 4 2021-2022</p>	<ul style="list-style-type: none"> ○ Continue to address educational goals for high priority stormwater issues to reduce stormwater pollution, increase the public's knowledge of hazards associated with illegal discharges and improper disposal of waste, and implement a diverse program with strategies that are targeted toward individuals or groups most likely to have significant stormwater impacts. ○ Coordinate with volunteers to for more stormwater inlet stenciling if necessary.

Compliance Period	Measurable Goals
	<ul style="list-style-type: none"> ○ Air 4 seasonal slides on the Town's public television station. ○ Post information on Town's website regarding maintenance requirements for owner of septic tanks in CBPAs. ○ Post information on the Town's website and social media that raise awareness regarding stormwater management issues. ○ May be update before June 1, 2021.
Year 5 2022-2023	<ul style="list-style-type: none"> ○ Continue to address educational goals for high priority stormwater issues to reduce stormwater pollution, increase the public's knowledge of hazards associated with illegal discharges and improper disposal of waste, and implement a diverse program with strategies that are targeted toward individuals or groups most likely to have significant stormwater impacts. ○ Coordinate with volunteers to for more stormwater inlet stenciling if necessary. ○ Air 4 seasonal slides on the Town's public television station. ○ Post information on Town's website regarding maintenance requirements for owner of septic tanks in CBPAs. ○ Post information on the Town's website and social media that raise awareness regarding stormwater management issues. ○ May be update before June 1, 2022.

B. Public Involvement and Participation

1. Specific Requirements

- a. *The permittee shall develop and implement procedures for the following: (1) The public to report potential illicit discharges, improper disposal, or spills to the MS4, complaints regarding land disturbing activities, or other potential stormwater pollution concerns; (2) The public to provide input on the permittee's MS4 program plan; (3) Receiving public input or complaints; (4) Responding to public input received on the MS4 program plan or complaints; and (5) Maintaining documentation of public input received on the MS4 program and associated MS4 program plan and the permittee's response.*
- b. *No later than three months after this permit's effective date, the permittee shall develop and maintain a webpage dedicated to the MS4 program and stormwater pollution prevention. The following information shall be posted on this webpage: (1) The effective MS4 permit and coverage letter; (2) The most current MS4 program plan or location where the MS4 program plan can be obtained; (3) The annual report for each year of the term covered by this permit no later than 30 days after submittal to the department; (4) A mechanism for the public to report potential illicit discharges, improper disposal, or spills to the MS4, complaints regarding land disturbing activities, or other potential stormwater pollution concerns in accordance with Part I E 2 a (1) [in the 2018 MS4 General Permit]; and (5) Methods for how the public can provide input on the permittee's MS4 program plan in accordance with Part I E 2 a (2) [in the 2018 MS4 General Permit].*

- c. *The permittee shall implement no less than four activities per year from two or more of the categories listed in Table 2 below [in the 2018 MS4 General Permit] to provide an opportunity for public involvement to improve water quality and support local restoration and clean-up projects.*
 - d. *The permittee may coordinate the public involvement opportunities listed in Table 2 [in the 2018 MS4 General Permit] with other MS4 permittees; however, each permittee shall be individually responsible for meeting all of the permit requirements.*
 - e. *The MS4 program plan shall include: (1) The webpage address where mechanisms for the public to report (i) potential illicit discharges, improper disposal, or spills to the MS4, (ii) complaints regarding land disturbing activities, or (iii) other potential stormwater pollution concerns; (2) The webpage address that contains the methods for how the public can provide input on the permittee's MS4 program; and (3) A description of the public involvement activities to be implemented by the permittee, the anticipated time period the activities will occur, and a metric for each activity to determine if the activity is beneficial to water quality. An example of metrics may include the weight of trash collected from a stream cleanup, the number of participants in a hazardous waste collection event, etc.*
2. For this minimum control measure, the Town of Ashland will implement the following programs:
- a. The Town has a Stormwater Management page on the Town's website that has a mechanisms for the public to report (i) potential illicit discharges, improper disposal, or spills to the MS4, (ii) complaints regarding land disturbing activities, or (iii) other potential stormwater pollution concerns that can be reached at this link: <https://www.ashlandva.gov/251/MS4-General-Permit-and-Program>.
 - b. Methods for how the public can provide input on the Town's MS4 program can be found at this Stormwater Management page as well.
 - c. The Town coordinates with and will continue to coordinate with Randolph-Macon College (R-MC) to implement stream pick-ups. These consist of volunteers walking streams and picking up litter, and often also includes a public awareness exhibit of trash collected from streams. These stream pick-ups are held at least once per year.
 - d. The Town coordinates with and will continue to coordinate with R-MC during "Macon a Difference Day", which is a service day, to implement pollution prevention projects. In the past these have included stream pick-ups, installing pet waste bag dispensers, picking up trash on streets and in parks to keep trash out of streams, etc.
 - e. The Town partners with and will continue to partner with R-MC by providing opportunities for to students to participate in Town projects. The Town's primary point of contact is the Chair of the Environmental Studies Program Dr. Charles Gowan (804-752-7293). Town staff communicates regularly with Dr. Gowan to identify new opportunities for collaboration between the Town and R-MC. Opportunities have included:
 - i. Internships to assist with the Town's stormwater program, which has included, but not limited to, locating stormwater outfalls.
 - ii. A hydrologic study to assess a major stream in the Town.
 - iii. Preliminary investigation to implement a stream restoration project in Town.
 - iv. Professors and students sampling for stream water quality.
 - v. Town Staff attends (as part of expert panel) end of semester presentations for class projects.
 - vi. Town staff makes presentations on stormwater regulations and programs to classes.

- c. Town Staff coordinates with and will continue to coordinate with youth groups and civic groups to implement stormwater management projects. In the past this has included marking stormwater inlets, stream and street pick-ups, etc.
3. Additional vehicles for public involvement/participation that may be implemented as part of this program include:
- a. Partner with local organizations such as:
 - i. VDOT – Designated as a Phase II permittee, VDOT must complete a department-wide storm water program. In addition, the department maintains an area headquarters within the Town. This affords ample opportunity for partnership in regards to the timely implementation of BMPs within the Town.
 - ii. Ashland Main Street Association
 - iii. Hanover Association of Businesses
 - iv. Hanover-Caroline Soil Conservation District
 - v. Hanover County Public Schools
 - vi. Departments of Forestry
 - vii. Department of Game and Inland Fisheries
 - viii. Girl Scouts, Boy Scouts, youth groups and other non-profit organizations

4. Measurable goals and target dates are listed in the chart below:

Compliance Period	Measurable Goals
Year 1 2018-2019	<ul style="list-style-type: none"> ○ Conduct at least one stream pick-up program and determine how many pounds of trash is collected. ○ Work with volunteer group to mark or stencil stormwater inlets and track number of inlets marked. ○ Work with volunteer group on stormwater prevention and/or educational project. ○ Collaborate with Girl Scout troop to install rain garden and count number of participants. ○ Promote use of Town of Ashland's Carwash Water Collection System for charity car washes and track how many times it is used. ○ Continue communication and collaboration with R-MC. ○ Work with at least one R-MC intern and occupy the student with stormwater related projects. ○ Provide stormwater educational material at least one Town event such as the Strawberry Faire.
Year 2 2019-2020	<ul style="list-style-type: none"> ○ Conduct at least one stream pick-up program and determine how many pounds of trash is collected. ○ Work with volunteer group to mark or stencil stormwater inlets and track number of inlets marked. ○ Work with volunteer group on stormwater prevention and/or educational project. ○ Promote use of Town of Ashland's Carwash Water Collection System for charity car washes and track how many times it is used. ○ Continue communication and collaboration with R-MC. ○ Work with at least one R-MC intern and occupy the student

	<p>with stormwater related projects.</p> <ul style="list-style-type: none"> ○ Provide stormwater educational material at least one Town event such as the Strawberry Faire. ○ Collaborate with Girl Scout Troop to design an educational sign to install near the rain garden.
<p>Year 3 2020-2021</p>	<ul style="list-style-type: none"> ○ Conduct at least one stream pick-up program during the spring and determine how many pounds of trash is collected. ○ Work with volunteer group to mark or stencil stormwater inlets and track number of inlets marked. ○ Work with volunteer group on stormwater prevention and/or educational project. ○ Promote use of Town of Ashland's Carwash Water Collection System for charity car washes and track how many times it is used. ○ Continue communication and collaboration with R-MC. ○ Work with at least one R-MC intern and occupy the student with stormwater related projects. ○ Provide stormwater educational material at least one Town event such as the Strawberry Faire. ○ May be update before June 1, 2020
<p>Year 4 2021-2022</p>	<ul style="list-style-type: none"> ○ Conduct at least one stream pick-up program during the spring and determine how many pounds of trash is collected. ○ Work with volunteer group to mark or stencil stormwater inlets and track number of inlets marked. ○ Work with volunteer group on stormwater prevention and/or educational project. ○ Promote use of Town of Ashland's Carwash Water Collection System for charity car washes and track how many times it is used. ○ Continue communication and collaboration with R-MC. ○ Work with at least one R-MC intern and occupy the student with stormwater related projects. ○ Provide stormwater educational material at least one Town event such as the Strawberry Faire. ○ May be update before June 1, 2021
<p>Year 5 2022-2023</p>	<ul style="list-style-type: none"> ○ Conduct at least one stream pick-up program during the spring and determine how many pounds of trash is collected. ○ Work with volunteer group to mark or stencil stormwater inlets and track number of inlets marked. ○ Work with volunteer group on stormwater prevention and/or educational project. ○ Promote use of Town of Ashland's Carwash Water Collection System for charity car washes and track how many times it is used. ○ Continue communication and collaboration with R-MC. ○ Work with at least one R-MC intern and occupy the student with stormwater related projects. ○ Provide stormwater educational material at least one Town event such as the Strawberry Faire.

C. Illicit Discharge Detection and Elimination

1. Specific Requirements

- a. *The permittee shall develop and maintain an accurate MS4 map and information table as follows:*
 - i. *A map of the storm sewer system owned or operated by the permittee within the census urbanized area identified by the 2010 decennial census that includes, at a minimum: (a) MS4 outfalls discharging to surface waters, except as follows: (i) In cases where the outfall is located outside of the MS4 permittee's legal responsibility, the permittee may elect to map the known point of discharge location closest to the actual outfall; and (ii) In cases where the MS4 outfall discharges to receiving water channelized underground, the permittee may elect to map the point downstream at which the receiving water emerges above ground as an outfall discharge location. If there are multiple outfalls discharging to an underground channelized receiving water, the map shall identify that an outfall discharge location represents more than one outfall. This is an option a permittee may choose to use and recognizes the difficulties in accessing outfalls to underground channelized stream conveyances for purposes of mapping, screening, or monitoring. (b) A unique identifier for each mapped item required in Part I E 3 [in the 2018 MS4 General Permit]; (c) The name and location of receiving waters to which the MS4 outfall or point of discharge discharges; (d) MS4 regulated service area; and (e) stormwater management facilities owned or operated by the permittee.*
 - ii. *The permittee shall maintain an information table associated with the storm sewer system map that includes the following information for each outfall or point of discharge for those cases in which the permittee elects to map the known point of discharge in accordance with Part I E 3 a (1) (a) [in the 2018 MS4 General Permit]: (a) A unique identifier as specified on the storm sewer system map; (b) The latitude and longitude of the outfall or point of discharge; (c) The estimated regulated acreage draining to the outfall or point of discharge; (d) The name of the receiving water; (e) The 6th Order Hydrologic Unit Code of the receiving water; (f) An indication as to whether the receiving water is listed as impaired in the Virginia 2016 305(b)/303(d) Water Quality Assessment Integrated Report; (g) The predominant land use for each outfall discharging to an impaired water; and (h) The name of any EPA approved TMDLs for which the permittee is assigned a waste load allocation.*
 - iii. *No later than July 1, 2019, the permittee shall submit to DEQ a GIS-compatible shapefile of the permittee's MS4 map as described in Part I E 3 a [in the 2018 MS4 General Permit]. If the permittee does not have an MS4 map in a GIS format, the permittee shall provide the map as a PDF document.*
 - iv. *No later than October 1 of each year, the permittee shall update the storm sewer system map and outfall information table to include any new outfalls constructed or TMDLs approved or both during the immediate preceding reporting period.*
 - v. *The permittee shall provide written notification to any downstream adjacent MS4 of any known physical interconnection established or discovered after the effective date of this permit.*

- b. *The permittee shall prohibit, through ordinance, policy, standard operating procedures, or other legal mechanism, to the extent allowable under federal, state, or local law, regulations, or ordinances, unauthorized non-stormwater discharges into the storm sewer system. Non-stormwater discharges or flows identified in 9VAC25-890-20 D 3 shall only be addressed if they are identified by the permittee as a significant contributor of pollutants discharging to the MS4. Flows that have been identified by the department as de minimis discharges are not significant sources of pollutants to surface water.*
- c. *The permittee shall maintain, implement, and enforce illicit discharge detection and elimination (IDDE) written procedures designed to detect, identify, and address unauthorized non-stormwater discharges, including illegal dumping, to the small MS4 to effectively eliminate the unauthorized discharge. Written procedures shall include:*
- (1) A description of the legal authorities, policies, standard operating procedures or other legal mechanisms available to the permittee to eliminate identified sources of ongoing illicit discharges including procedures for using legal enforcement authorities.*
 - (2) Dry weather field screening protocols to detect, identify, and eliminate illicit discharges to the MS4. The protocol shall include: (a) A prioritized schedule of field screening activities and rationale for prioritization determined by the permittee based on such criteria as age of the infrastructure, land use, historical illegal discharges, dumping or cross connections; (b) If the total number of MS4 outfalls is equal to or less than 50, a schedule to screen all outfalls annually; (c) If the total number of MS4 outfalls is greater than 50, a schedule to screen a minimum of 50 outfalls annually such that no more than 50% are screened in the previous 12-month period. The 50% criteria is not applicable if all outfalls have been screened in the previous three years; and (d) A mechanism to track the following information: (i) The unique outfall identifier; (ii) Time since the last precipitation event; (iii) The estimated quantity of the last precipitation event; (iv) Site descriptions (e.g., conveyance type and dominant watershed land uses); (v) Whether or not a discharge was observed; and (vi) If a discharge was observed, the estimated discharge rate (e.g., width and depth of discharge flow rate) and visual characteristics of the discharge (e.g., odor, color, clarity, floatables, deposits or stains, vegetation condition, structural condition, and biology).*
 - (3) A timeframe upon which to conduct an investigation to identify and locate the source of any observed unauthorized non-stormwater discharge. Priority of investigations shall be given to discharges of sanitary sewage and those believed to be a risk to human health and public safety. Discharges authorized under a separate VPDES or state permit require no further action under this permit.*
 - (4) Methodologies to determine the source of all illicit discharges. If the permittee is unable to identify the source of an illicit discharge within six months of beginning the investigation then the permittee shall document that the source remains unidentified. If the observed discharge is intermittent, the permittee shall document that attempts to observe the discharge flowing were unsuccessful.*
 - (5) Methodologies for conducting a follow-up investigation for illicit discharges that are continuous or that permittees expect to occur more frequently than a one-time discharge to verify that the discharge has been eliminated except as provided for in Part I.E.3.c(4) [in the 2018 MS4 General Permit] ;*
 - (6) A mechanism to track all illicit discharge investigations to document the following: (a) The dates that the illicit discharge was initially observed, reported, or both; (b) The results of the investigation, including the source, if identified; (c) Any follow-up to the investigation; (d) Resolution of the investigation; and (e) The date that the investigation was closed.*
- d. *The MS4 program plan shall include:*

- i. *The MS4 map and information table required by Part I.E.3.a [in the 2018 MS4 General Permit]. The map and information table may be incorporated into the MS4 program plan by reference. The map shall be made available to the department within 14 days upon request;*
 - ii. Copies of written notifications of new physical interconnections given by the permittee to other MS4s; and
 - iii. The IDDE procedures described in Part I.E.3.c [in the 2018 MS4 General Permit].
1. For this minimum control measure, the Town of Ashland will implement the following programs:
- a. The Town will review and update its MS4 map and information table as necessary to comply with the following items of the 2018 MS4 General Permit as follows:
 - i. A map of the storm sewer system owned or operated by the Town within the census urbanized area identified by the 2010 decennial census that includes, at a minimum: (a) MS4 outfalls discharging to surface waters; (b) A unique identifier for each mapped item required in Part I E 3 in the 2018 MS4 General Permit; (c) The name and location of receiving waters to which the MS4 outfall or point of discharge discharges; (d) MS4 regulated service area; and (e) stormwater management facilities owned or operated by the Town
 - b. The Town will review and update as necessary its information table associated with the storm sewer system map to include the following information for each outfall or point of discharge for those cases in which the permittee elects to map the known point of discharge in accordance with 1.a.(1) above: (a) A unique identifier as specified on the storm sewer system map; (b) The latitude and longitude of the outfall or point of discharge; (c) The estimated regulated acreage draining to the outfall or point of discharge; (d) The name of the receiving water; (e) The 6th Order Hydrologic Unit Code of the receiving water; (f) An indication as to whether the receiving water is listed as impaired in the Virginia 2016 305(b)/303(d) Water Quality Assessment Integrated Report; (g) The predominant land use for each outfall discharging to an impaired water; and (h) The name of any EPA approved TMDLs for which the permittee is assigned a waste load allocation.
 - c. There are no physical interconnections made between the Town and other MS4s.
 - d. The Town will review its IDDE procedures to verify compliance with Part.I.E.3.c in the 2018 MS4 General Permit.
 - e. Hanover County owns the sanitary sewer system in the Town of Ashland. Hanover County runs a program identify improper discharges and leaks from the sanitary sewer system.
 - f. The following chapters of the Town of Ashland's Municipal Code address this measure:
 - i. Chapter 4.1: *Environmental Protection* – This chapter includes the Chesapeake Bay Preservation Area Ordinance (CBPO) as well as the Town's Water Quality Protection Ordinance. The CBPO established requirements for septic tank inspections. It also outlines the enforcement and penalties associated with noncompliance of this chapter. This chapter also includes the Municipal Separate Storm Sewer System (MS-4) Management Program Ordinance, which establishes prohibitions associated with discharges to a storm sewer system as well as penalties for violations. The Stormwater Management Ordinance was added to this chapter in 2014 to address Virginia Stormwater Management Program requirements, which includes requirements for pollution prevention during construction.

- ii. Chapter 5: *Erosion and sediment Control* – This chapter address the Town’s Erosion and Sediment Control requirements.
- iii. Chapter 17: *Subdivision of Land* – The portions of this chapter that are relevant to illicit discharge include: Article II, Divisions 1 and 2 discuss approval of plats and standards. Both of these articles cover the suitability of the land, as well as drainage and flooding and other hazards associated with the design of subdivisions.
- g. The Town inspects all outfalls annually because there are fewer than 50 outfalls in Town.
- h. The Town trains staff in identifying and eliminating illicit discharge in accordance with Town’s Stormwater Pollution Prevention Employee Training Plan.
- i. The Town investigates illicit connections to the storm drain system in older portions of Town. Recordkeeping and code enforcement may not have been equivalent to today’s standards when these residences and businesses were first built, or undocumented modifications might have been made since construction.
- j. The Town conducts storm sewer flushing and TV monitoring of selected storm sewer pipes in Town. These are frequently conducted in older storm sewer systems.
- k. The Town will continue to review update (when appropriate) and post/distribute education and outreach material that deals with illicit discharge.
- l. The Town developed and will continue to implement, and update (when appropriate) written procedures to detect, identify, and address unauthorized non-stormwater discharges, including illegal dumping, to the Town’s MS4. These procedures include written dry weather field screening methodologies to detect and eliminate illicit discharges to the MS4 that include field observations and field screening monitoring and that provide:
 - o A prioritized schedule;
 - o The minimum number of field screening activities the Town will complete annually;
 - o Methodologies to collect the general information such as time since the last rain, the quantity of the last rain, site descriptions, estimated discharge rate and visual observations;
 - o A time frame upon which to conduct an investigation or investigations to identify and locate the source of any observed continuous or intermittent non-stormwater discharge;
 - o Methodologies to determine the source of all illicit discharges;
 - o Mechanisms to eliminate identified sources of illicit discharges;
 - o Methods for conducting a follow-up investigation; and
 - o A mechanism to track all investigations.

3. Measurable goals and target dates are listed in the chart below:

Compliance Period	Measurable Goals
Year 1 2018-2019	<ul style="list-style-type: none"> o Update the MS4 map and information table required by Part I.E.3.a in the 2018 MS4 General Permit with newly required information. o Continue implementing the Town’s written IDDE procedures designed 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.

Compliance Period	Measurable Goals
	<ul style="list-style-type: none"> ○ No later than October 1, the Town will update the storm sewer system map and outfall information table to include any new outfalls constructed or TMDLs approved or both during the immediately preceding reporting period. ○ The Town will provide written notification to any downstream adjacent MS4 of any known physical interconnection established or discovered after the effective date of the 2018 MS4 General Permit. ○ Post or distribute educational information on IDDE on Town website and social media. ○ No later than July 1, 2019, the Town will submit to DEQ a GIS-compatible shapefile of the Town's MS4 map as described in Part I.E.3.a in the 2018 MS4 General Permit. If the Town does not have an MS4 map in a GIS format, the Town will provide the map as a PDF document.
Year 2 2019-2020	<ul style="list-style-type: none"> ○ The Town will review its MS4 Ordinance to assure that it is in compliance with the current MS4 General Permit. ○ The Town will review its IDDE written procedures designed to detect, identify, and address unauthorized non-stormwater discharges, including illegal dumping, to the small MS4 to effectively eliminate the unauthorized discharge to verify it is in compliance with the 2018 MS4 General Permit. ○ No later than October 1, the Town will update the storm sewer system map and outfall information table to include any new outfalls constructed or TMDLs approved or both during the immediately preceding reporting period. ○ The Town will provide written notification to any downstream adjacent MS4 of any known physical interconnection established or discovered after the effective date of the 2018 MS4 General Permit. ○ 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. ○ Post educational information on IDDE on Town website and social media.
Year 3 2020-2021	<ul style="list-style-type: none"> ○ No later than October 1, the Town will update the storm sewer system map and outfall information table to include any new outfalls constructed or TMDLs approved or both during the immediately preceding reporting period. ○ The Town will provide written notification to any downstream adjacent MS4 of any known physical interconnection established or discovered after the effective date of the 2018 MS4 General Permit. ○ Continue implementing the procedures to detect, identify, and address unauthorized non-stormwater discharges, including

Compliance Period	Measurable Goals
	<p>illegal dumping as outlined in the updated “unauthorized non-stormwater discharge detection and elimination procedures”. Keep records and report as specified.</p> <ul style="list-style-type: none"> ○ Post educational information on IDDE on Town website and social media. ○ This list may be updated prior to June 30, 2020.
Year 4 2021-2022	<ul style="list-style-type: none"> ○ No later than October 1, the Town will update the storm sewer system map and outfall information table to include any new outfalls constructed or TMDLs approved or both during the immediately preceding reporting period. ○ The Town will provide written notification to any downstream adjacent MS4 of any known physical interconnection established or discovered after the effective date of the 2018 MS4 General Permit. ○ 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. ○ Post educational information on IDDE on Town website and social media. ○ This list may be update prior to June 30, 2021.
Year 5 2022-2023	<ul style="list-style-type: none"> ○ No later than October 1, the Town will update the storm sewer system map and outfall information table to include any new outfalls constructed or TMDLs approved or both during the immediately preceding reporting period. ○ The Town will provide written notification to any downstream adjacent MS4 of any known physical interconnection established or discovered after the effective date of the 2018 MS4 General Permit. ○ 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. ○ Post educational information on IDDE on Town website and social media. ○ This list may be updated prior to June 30, 2022.

D. Construction Site Storm Water Runoff Control

1. Specific Requirements

- a. *The permittee shall utilize its legal authority, such as ordinances, permits, orders, specific contract language, and interjurisdictional agreements, to address discharges entering the MS4 from regulated construction site stormwater runoff. The permittee shall control construction site stormwater runoff as follows: (1)*

- ii. Chapter 5 – Erosion and Sediment Control (updated in 2007). Requirements for erosion and sediment controls as well as sanctions to ensure compliance. Requirements for construction site operators to implement appropriate erosion and sediment control BMPs. Procedures for site plan review. Procedures for site inspection. Continue to formally document regulated land disturbing activities and submit the following information for the reporting period with the annual report: (the following information is currently being gathered as part of Chapter 5)
 - a) Total number of regulated land disturbing activities; and
 - b) Total disturbed acreage.
- iii. Chapter 17 – Subdivision of Land
- iv. Chapter 21 – Zoning
- d. The above referenced chapters include requirements for site plan review, erosion and sediment control construction techniques and inspections, post-construction inspections and record drawings, as well as penalties for non-compliance.
- e. The Town has a site plan checklist that includes stormwater management requirements that must be met to get an approved site plan. In addition, Town staff meets with parties that are preparing to develop a site. Information on stormwater management requirements is provided to the developer.
- f. The Town continues to implement a VSMP General Construction Permit inspection program in accordance with State requirements.

3. Measurable goals and target dates are listed in the chart below:

Compliance Period	Measurable Goals
Year 1 2018-2019	<ul style="list-style-type: none"> ○ Continue to formally document regulated land disturbing activities and submit the following information for the reporting period with the annual report: <ul style="list-style-type: none"> ○ Total number of regulated land disturbing activities; ○ Total disturbed acreage. ○ Implement VSMP General Construction Permit inspection program. ○ Maintain a consistent E&S Program in accordance with DEQ.
Year 2 2019-2020	<ul style="list-style-type: none"> ○ Continue to formally document regulated land disturbing activities and submit the following information for the reporting period with the annual report: <ul style="list-style-type: none"> ○ Total number of regulated land disturbing activities; ○ Total disturbed acreage. ○ Implement VSMP General Construction Permit inspection program. ○ Maintain a consistent E&S Program in accordance with DEQ.
Year 3 2020-2021	<ul style="list-style-type: none"> ○ Continue to formally document regulated land disturbing activities and submit the following information for the reporting period with the annual report: <ul style="list-style-type: none"> ○ Total number of regulated land disturbing activities; ○ Total disturbed acreage. ○ Implement VSMP General Construction Permit inspection program. ○ Maintain a consistent E&S Program in accordance with DEQ.

<p>Year 4 2021-2022</p>	<ul style="list-style-type: none"> ○ Continue to formally document regulated land disturbing activities and submit the following information for the reporting period with the annual report: <ul style="list-style-type: none"> ○ Total number of regulated land disturbing activities; ○ Total disturbed acreage. ○ Implement VSMP General Construction Permit inspection program. ○ Maintain a consistent E&S Program in accordance with DEQ.
<p>Year 5 2022-2023</p>	<ul style="list-style-type: none"> ○ Continue to formally document regulated land disturbing activities and submit the following information for the reporting period with the annual report: <ul style="list-style-type: none"> ○ Total number of regulated land disturbing activities; ○ Total disturbed acreage. ○ Implement VSMP General Construction Permit inspection program. ○ Maintain a consistent E&S Program in accordance with DEQ.

E. Post-Construction Stormwater Management for New Development and Development on Prior Developed Lands

1. Specific Requirements

- a. *The permittee shall address post-construction stormwater runoff that enters the MS4 from the following land disturbing activities by implementing a post-construction stormwater runoff management program as follows:*
 - i. *If the permittee is a city, county, or town, with an approved Virginia Stormwater Management Program (VSMP), the permittee shall implement the VSMP consistent with the Virginia Stormwater Management Act (§ 62.1-44.15:24 et seq. of the Code of Virginia) and VSMP Regulations (9VAC25-870) as well as develop an inspection and maintenance program in accordance with Parts I E 5 b and c [in the 2018 MS4 General Permit].*
- b. *The permittee shall implement an inspection and maintenance program for those stormwater management facilities owned or operated by the permittee that discharges to the MS4 as follows:*
 - i. *The permittee shall develop and maintain written inspection and maintenance procedures in order to ensure adequate long-term operation and maintenance of its stormwater management facilities;*
 - ii. *The permittee shall inspect stormwater management facilities owned or operated by the permittee no less than once per year. The permittee may choose to implement an alternative schedule to inspect these stormwater management facilities based on facility type and expected maintenance needs provided that the alternative schedule and rationale is included in the MS4 program plan. The alternative inspection frequency shall be no less than once per five years; and*
 - iii. *If during the inspection of the stormwater management facility conducted in accordance with Part I E 5 b (2) [in the 2018 MS4 General Permit], it is determined that maintenance is required, the permittee shall conduct the maintenance in accordance with the written procedures developed under Part I E 5 b (1) [in the 2018 MS4 General Permit].*
- c. *For those permittees described in Part I E 5 a (1) or (2) [in the 2018 MS4 General Permit], the permittee shall:*
 - i. *Implement an inspection and enforcement program for stormwater management facilities not owned by the permittee (i.e., privately owned) that includes:*

- (a) *An inspection frequency of no less than once per five years for all privately owned stormwater management facilities that discharge into the MS4; and*
- (b) *Adequate long-term operation and maintenance by the owner of the stormwater management facility by requiring the owner to develop and record a maintenance agreement, including an inspection schedule to the extent allowable under state or local law or other legal mechanism;*
- ii. *Utilize its legal authority for enforcement of the maintenance responsibilities if maintenance is neglected by the owner; and*
- iii. *The permittee may develop and implement a progressive compliance and enforcement strategy provided that the strategy is included in the MS4 program plan.*
- d. *The permittee shall maintain an electronic database or spreadsheet of all known permittee-owned or permittee-operated and privately-owned stormwater management facilities that discharge into the MS4. The database shall also include all BMPs implemented by the permittee to meet the Chesapeake Bay TMDL load reduction as required in Part II A. A database shall include the following information as applicable:*
 - i. *The stormwater management facility or BMP type;*
 - ii. *The stormwater management facility or BMPs location as latitude and longitude;*
 - iii. *The acres treated by the stormwater management facility or BMP, including total acres, pervious acres, and impervious acres;*
 - iv. *The date the facility was brought online (MM/YYYY). If the date brought online is not known, the permittee shall use June 30, 2005;*
 - v. *The 6th Order Hydrologic Unit Code in which the stormwater management facility is located;*
 - vi. *Whether the stormwater management facility or BMP is owned or operated by the permittee or privately owned;*
 - vii. *Whether or not the stormwater management facility or BMP is part of the permittee's Chesapeake Bay TMDL action plan required in Part II A or local TMDL action plan required in Part II B [in the 2018 MS4 General Permit], or both;*
 - viii. *If the stormwater management facility or BMP is privately owned, whether a maintenance agreement exists; and*
 - ix. *The date of the permittee's most recent inspection of the stormwater management facility or BMP.*
- e. *The electronic database or spreadsheet shall be updated no later than 30 days after a new stormwater management facility is brought online, a new BMP is implemented to meet a TMDL load reduction as required in Part II [in the 2018 MS4 General Permit] or discovered if it is an existing stormwater management facility.*
- f. *The permittee shall use the DEQ Construction Stormwater Database or other application as specified by the department to report each stormwater management facility installed after July 1, 2014, to address the control of post-construction runoff from land disturbing activities for which the permittee is required to obtain a General VPDES Permit for Discharges of Stormwater from Construction Activities.*
- g. *No later than October 1 of each year, the permittee shall electronically report the stormwater management facilities and BMPs implemented between July 1 and June 30 of each year using the DEQ BMP Warehouse and associated reporting template for any practices not reported in accordance with Part I E 5 f [in the 2018 MS4 General Permit] including stormwater management facilities installed to control post-development stormwater runoff from land disturbing activities less than one acre in accordance with the Chesapeake Bay Preservation Act regulations (9VAC25-830) and for which a General VPDES Permit for Discharges of Stormwater from Construction Activities was not required.*

- h. *The MS4 program plan shall include:*
 - i. *If the permittee implements a VSMP in accordance with Part I E 5 a (1) and (2) [in the 2018 MS4 General Permit]:*
 - (a) *A copy of the VSMP approval letter issued by the department;*
 - (b) *Written inspection procedures and all associated documents utilized in the inspection of privately-owned stormwater management facilities; and*
 - (c) *Written procedures for compliance and enforcement of inspection and maintenance requirements for privately owned BMPs.*
 - ii. *A description of the legal authorities utilized to ensure compliance with Part I E 5 a [in the 2018 MS4 General Permit] for post-construction stormwater runoff control such as ordinances (provide citation as appropriate), permits, orders, specific contract language, and interjurisdictional agreements;*
 - iii. *Written inspection procedures and all associated documents utilized during inspection of stormwater management facilities owned or operated by the permittee;*
 - iv. *The roles and responsibilities of each of the permittee's departments, divisions, or subdivisions in implementing the post-construction stormwater runoff control program; and*
 - v. *The stormwater management facility spreadsheet or database incorporated by reference and the location or webpage address where the spreadsheet or database can be reviewed.*

2. For this minimum control measure, the Town of Ashland will implement the following programs:

- a. The Town will continue to address (and update its program as necessary) post-construction stormwater runoff that enters the MS4 from the following land disturbing activities by implementing a post-construction stormwater runoff management program as follows: the Town will continue to implement the VSMP consistent with the Virginia Stormwater Management Act (§ 62.1-44.15:24 et seq. of the Code of Virginia) and VSMP Regulations (9VAC25-870) as well as develop an inspection and maintenance program in accordance with Parts I.E.5.b and c in the 2018 MS4 General Permit.
- b. The Town will continue to implement (and update as necessary) its inspection and maintenance program for those stormwater management facilities owned or operated by the Town that discharges to the MS4 as follows:
 - i. The Town will review and update, if necessary, its written inspection and maintenance procedures to ensure adequate long-term operation and maintenance of its stormwater management facilities;
 - ii. The Town will inspect stormwater management facilities owned or operated by the Town no less than once per year. The Town may choose to implement an alternative schedule to inspect these stormwater management facilities based on facility type and expected maintenance needs provided that the alternative schedule and rationale will be included in the MS4 program plan. The alternative inspection frequency will be no less than once per five years; and
 - iii. If during the inspection of the stormwater management facility conducted in accordance with Part I.E.5.b(2) in the 2018 MS4 General Permit, it is determined that maintenance is required, the Town will conduct the maintenance in accordance with the written procedures developed under Part I.E.5.b1) in the 2018 MS4 General Permit.
- c. The Town will continue its inspection and enforcement program for stormwater management facilities not owned by the permittee (i.e., privately-owned) that includes:

- i. An inspection frequency of no less than once per three years for all privately-owned stormwater management facilities that discharge into the MS4; and
 - ii. Adequate long-term operation and maintenance by the owner of the stormwater management facility by requiring the owner to execute and record a maintenance agreement that includes:
 - (a) an inspection schedule to the extent allowable under state or local law or other legal mechanism;
 - (b) Utilizes the Town's legal authority for enforcement of the maintenance responsibilities if maintenance is neglected by the owner; and
 - iii. The Town may choose to develop and implement a progressive compliance and enforcement strategy. If the Town does so, the strategy will be included in future updates of the MS4 program plan.
- d. The Town will continue to maintain its Arc GIS database of all known Town-owned/operated and privately-owned stormwater management facilities that discharge into the MS4. The database includes all BMPs implemented by the Town to meet the Chesapeake Bay TMDL load reduction as required in Part II.A in the 2018 MS4 General Permit. The database includes or will be updated to include the following information as applicable:
 - i. The stormwater management facility or BMP type;
 - ii. The stormwater management facility or BMPs location as latitude and longitude;
 - iii. The acres treated by the stormwater management facility or BMP, including total acres, pervious acres, and impervious acres;
 - iv. The date the facility was brought online (MM/YYYY). If the date brought online is not known, the Town shall use June 30, 2005;
 - v. The 6th Order Hydrologic Unit Code in which the stormwater management facility is located;
 - vi. The operator of the stormwater management facility or BMP (i.e., Town or privately owned);
 - vii. Whether or not the stormwater management facility or BMP is part of the Town's Chesapeake Bay TMDL action plan required in Part II.A or local TMDL action plan required in Part II.B in the 2018 MS4 General Permit, or both;
 - viii. If the stormwater management facility or BMP is privately-owned, information regarding the maintenance agreement; and
 - ix. The date of the permittee's most recent inspection of the stormwater management facility or BMP.
- e. The GIS database will be updated no later than 30 days after a new stormwater management facility is brought online, a new BMP is implemented to meet a TMDL load reduction as required in Part II or discovered if it is an existing stormwater management facility.
- f. The Town will use the DEQ Construction Stormwater Database or other application as specified by the department to report each stormwater management facility installed after July 1, 2014, to address the control of post-construction runoff from land disturbing activities for which the Town is required to obtain a General VPDES Permit for Discharges of Stormwater from Construction Activities.
- g. No later than October 1 of each year, the Town will electronically report the stormwater management facilities and BMPs implemented between July 1 and June 30 of each year using the DEQ BMP Warehouse and associated reporting template for any practices not reported in accordance with 1.f above, including stormwater management facilities installed to control post-development stormwater runoff from land disturbing activities less than one acre in accordance with the Chesapeake Bay Preservation Act regulations

(9VAC25-830) and for which a General VPDES Permit for Discharges of Stormwater from Construction Activities was not required.

- h. The Town will continue to implement its street sweeping program that includes formally documenting the hours and/or miles of sweeping completed on a weekly basis. The Town also quantifies the amount of “sweepings” by measuring the volume of material in the street sweeper hopper.
3. The MS4 Program Plan also includes the following:
- a. Since the Town implements a VSMP in accordance with Part I E 5 a (1) in the 2018 MS4 General Permit, the program plan includes by reference:
 - i. The VSMP approval letter issued by the department <https://www.ashlandva.gov/DocumentCenter/View/3121/DEQ-Approval-of-Town-Program>;
 - ii. A sample BMP maintenance agreement, which includes written inspection procedures and written procedures for compliance and enforcement of inspection and maintenance requirements for privately owned BMPs <https://www.ashlandva.gov/DocumentCenter/View/3122/MAINTENANCE-AGREEMENT-w-Maintenance-Plan>; and
 - iii. A sample BMP inspection checklist utilized in the inspection of privately-owned stormwater management facilities <https://www.ashlandva.gov/DocumentCenter/View/3123/BMPInspectionChecklist>.
 - b. The following items demonstrate the Town’s the legal authorities utilized to ensure compliance with Part I.E.5 a for post-construction stormwater runoff control:
 - i. The following chapters of the Town of Ashland’s Municipal Code [\[https://ashland.municipalcodeonline.com/book?type=code#name=Preface\]](https://ashland.municipalcodeonline.com/book?type=code#name=Preface)
 - a) Chapter 4.1 – Environmental Protection – This Chapter outlines the requirements for post construction stormwater management BMPs for new development and redevelopment. These requirements are consistent with the Chesapeake Bay Preservation Act and the Virginia Department of Environmental Quality’s requirements.
 - b) Chapter 5 – Erosion and Sediment Control
 - c) Chapter 17 – Subdivision of Land
 - d) Chapter 21 – Zoning
 - ii. The Town’s Site Plan Application and Checklist requires a BMP maintenance agreement as part of plan approval and permit issuance <https://ashlandva.gov/DocumentCenter/View/74/Site-Plan-Application--Checklist?bidId=>]. The BMP Maintenance Agreement includes an inspection schedule for structural BMPs.
 - iii. Written inspection procedures and documents utilized for inspection of stormwater management facilities owned or operated by the Town referenced above;
 - iv. The Public Works Department is the main division that has roles and responsibilities in implementing the post-construction stormwater runoff control program;
 - v. The stormwater management facility Arc GIS database incorporated by reference, which may be reviewed upon request by the public or DEQ

3. Measurable goals and target dates are listed in the chart below:

Compliance Period	Measurable Goals
Year 1 2018-2019	<ul style="list-style-type: none"> ○ Continue tracking existing BMPs and enforcing inspection requirements. ○ Inspect Town owned BMPs in accordance with the Town's BMP Maintenance Plans. Perform maintenance as needed. ○ No later than October 1, electronically report the stormwater management facilities and BMPs implemented between July 1 and June 30 using the DEQ BMP Warehouse and associated reporting template.
Year 2 2019-2020	<ul style="list-style-type: none"> ○ Continue tracking existing BMPs and enforcing inspection requirements. ○ Inspect Town owned BMPs in accordance with the Town's BMP Maintenance Plans. Perform maintenance as needed. ○ No later than October 1, electronically report the stormwater management facilities and BMPs implemented between July 1 and June 30 using the DEQ BMP Warehouse and associated reporting template.
Year 3 2020-2021	<ul style="list-style-type: none"> ○ Continue tracking existing BMPs and enforcing inspection requirements. ○ Inspect Town owned BMPs in accordance with the Town's BMP Maintenance Plans. Perform maintenance as needed. ○ No later than October 1, electronically report the stormwater management facilities and BMPs implemented between July 1 and June 30 using the DEQ BMP Warehouse and associated reporting template.
Year 4 2021-2022	<ul style="list-style-type: none"> ○ Continue tracking existing BMPs and enforcing inspection requirements. ○ Inspect Town owned BMPs in accordance with the Town's BMP Maintenance Plans. Perform maintenance as needed. ○ No later than October 1, electronically report the stormwater management facilities and BMPs implemented between July 1 and June 30 using the DEQ BMP Warehouse and associated reporting template.
Year 5 2022-2023	<ul style="list-style-type: none"> ○ Continue tracking existing BMPs and enforcing inspection requirements. ○ Inspect Town owned BMPs in accordance with the Town's BMP Maintenance Plans. Perform maintenance as needed. ○ No later than October 1, electronically report the stormwater management facilities and BMPs implemented between July 1 and June 30 using the DEQ BMP Warehouse and associated reporting template.

F. Pollution Prevention and Good Housekeeping for Facilities Owned or Operated by the Permittee within the MS4 Service Area

1. Specific Requirements

- a. *The permittee shall maintain and implement written procedures for those activities at facilities owned or operated by the permittee, such as road, street, and parking lot maintenance; equipment maintenance; and the application, storage, transport, and disposal of pesticides, herbicides, and fertilizers designed to:*
 - i. *Prevent illicit discharges;*
 - ii. *Ensure the proper disposal of waste materials, including landscape wastes;*
 - iii. *Prevent the discharge of wastewater or permittee vehicle wash water or both into the MS4 without authorization under a separate VPDES permit;*
 - iv. *Require implementation of best management practices when discharging water pumped from utility construction and maintenance activities;*
 - v. *Minimize the pollutants in stormwater runoff from bulk storage areas (e.g., salt storage, topsoil stockpiles) through the use of best management practices;*
 - vi. *Prevent pollutant discharge into the MS4 from leaking municipal automobiles and equipment; and*
 - vii. *Ensure that the application of materials, including fertilizers and pesticides, is conducted in accordance with the manufacturer's recommendations.*
- b. *The written procedures established in accordance with Part I E 6 a [in the 2018 MS4 General Permit] shall be utilized as part of the employee training program at Part I E 6 m [in the 2018 MS4 General Permit].*
- c. *Within 12 months of state permit coverage, the permittee shall identify which of the high-priority facilities have a high potential of discharging pollutants. The permittee shall maintain and implement a site-specific stormwater pollution prevention plan (SWPPP) for each facility identified. High priority facilities that have a high potential for discharging pollutants are those facilities that are not covered under a separate VPDES permit and which any of the following materials or activities occur and are expected to have exposure to stormwater resulting from rain, snow, snowmelt or runoff:*
- d. *Each SWPPP as required in Part I E 6 c [in the 2018 MS4 General Permit] shall include the following:*
 - i. *A site description that includes a site map identifying all outfalls, direction of stormwater flows, existing source controls, and receiving water bodies;*
 - ii. *A description and checklist of the potential pollutants and pollutant sources;*
 - iii. *A description of all potential nonstormwater discharges;*
 - iv. *Written procedures designed to reduce and prevent pollutant discharge;*
 - v. *A description of the applicable training as required in Part I E 6 m [in the 2018 MS4 General Permit];*
 - vi. *Procedures to conduct an annual comprehensive site compliance evaluation;*
 - vii. *An inspection frequency of no less than once per year and maintenance requirements for site specific source controls. The date of each inspection and associated findings and follow-up shall be logged in each SWPPP; and*
 - viii. *A log of each unauthorized discharge, release, or spill incident reported in accordance with Part III G [in the 2018 MS4 General Permit] including the following information:*
 - (1) *Date of incident;*
 - (2) *Material discharged, released, or spilled; and*
 - (3) *Estimated quantity discharged, released or spilled.*
- e. *No later than June 30 of each year, the permittee shall annually review any high-priority facility owned or operated by the permittee for which a SWPPP has not been developed to determine if the facility has a high potential to discharge pollutants as described in Part I E 6 c [in the 2018 MS4 General Permit]. If the facility is determined to be a high-priority facility with a high potential to discharge pollutants, the permittee shall develop a SWPPP*

meeting the requirements of Part I E 6 d [in the 2018 MS4 General Permit] no later than December 31 of that same year.

- f. The permittee shall review the contents of any site specific SWPPP no later than 30 days after any unauthorized discharge, release, or spill reported in accordance with Part III G to determine if additional measures are necessary to prevent future unauthorized discharges, releases, or spills. If necessary, the SWPPP shall be updated no later than 90 days after the unauthorized discharge.*
- g. The SWPPP shall be kept at the high-priority facility with a high potential to discharge and utilized as part of staff training required in Part I E 6 m. The SWPPP and associated documents may be maintained as a hard copy or electronically as long as the documents are available to employees at the applicable site.*
- h. If activities change at a facility such that the facility no longer meets the criteria of a high-priority facility with a high potential to discharge pollutants as described in Part I E 6 c, the permittee may remove the facility from the list of high-priority facilities with a high potential to discharge pollutants.*
- i. The permittee shall maintain and implement turf and landscape nutrient management plans that have been developed by a certified turf and landscape nutrient management planner in accordance with § 10.1-104.2 of the Code of Virginia on all lands owned or operated by the permittee where nutrients are applied to a contiguous area greater than one acre. If nutrients are being applied to achieve final stabilization of a land disturbance project, application shall follow the manufacturer's recommendations.*
- j. Permittees with lands regulated under § 10.1-104.4 of the Code of Virginia, including state agencies, state colleges and universities, and other state government entities, shall continue to implement turf and landscape nutrient management plans in accordance with this statutory requirement.*
- k. The permittee shall not apply any deicing agent containing urea or other forms of nitrogen or phosphorus to parking lots, roadways, and sidewalks, or other paved surfaces.*
- l. The permittee shall require through the use of contract language, training, standard operating procedures, or other measures within the permittee's legal authority that contractors employed by the permittee and engaging in activities with the potential to discharge pollutants use appropriate control measures to minimize the discharge of pollutants to the MS4.*
- m. The permittee shall develop a training plan in writing for applicable staff that ensures the following:*
 - i. Field personnel receive training in the recognition and reporting of illicit discharges no less than once per 24 months;*
 - ii. Employees performing road, street, and parking lot maintenance receive training in pollution prevention and good housekeeping associated with those activities no less than once per 24 months;*
 - iii. Employees working in and around maintenance, public works, or recreational facilities receive training in good housekeeping and pollution prevention practices associated with those facilities no less than once per 24 months;*
 - iv. Employees and contractors hired by the permittee who apply pesticides and herbicides are trained or certified in accordance with the Virginia Pesticide Control Act (§ 3.2-3900 et seq. of the Code of Virginia). Certification by the Virginia Department of Agriculture and Consumer Services (VCACS) Pesticide and Herbicide Applicator program shall constitute compliance with this requirement;*
 - v. Employees and contractors serving as plan reviewers, inspectors, program administrators, and construction site operators obtain the appropriate certifications as*

- required under the Virginia Erosion and Sediment Control Law and its attendant regulations;*
- vi. Employees and contractors implementing the stormwater program obtain the appropriate certifications as required under the Virginia Stormwater Management Act and its attendant regulations; and*
 - vii. Employees whose duties include emergency response have been trained in spill response. Training of emergency responders such as firefighters and law-enforcement officers on the handling of spill releases as part of a larger emergency response training shall satisfy this training requirement and be documented in the training plan.*
 - n. The permittee shall maintain documentation of each training event conducted by the permittee to fulfill the requirements of Part I E 6 m [in the 2018 MS4 General Permit] for a minimum of three years after the training event. The documentation shall include the following information:*
 - i. The date of the training event;*
 - ii. The number of employees attending the training event; and*
 - iii. The objective of the training event.*
 - o. The permittee may fulfill the training requirements in Part I E 6 m [in the 2018 MS4 General Permit], in total or in part, through regional training programs involving two or more MS4 permittees; however, the permittee shall remain responsible for ensuring compliance with the training requirements.*
 - p. The MS4 program plan shall include:*
 - i. The written procedures for the operations and maintenance activities as required by Part I E 6 a [in the 2018 MS4 General Permit];*
 - ii. A list of all high-priority facilities owned or operated by the permittee required in accordance with Part I E 6 c [in the 2018 MS4 General Permit], and whether or not the facility has a high potential to discharge;*
 - iii. A list of lands for which turf and landscape nutrient management plans are required in accordance with Part I E 6 i and j [in the 2018 MS4 General Permit], including the following information:*
 - (1) The total acreage on which nutrients are applied;*
 - (2) (The date of the most recently approved nutrient management plan for the property; and*
 - (3) The location in which the individual turf and landscape nutrient management plan is located;*
 - iv. A summary of mechanisms the permittee uses to ensure contractors working on behalf of the permittees implement the necessary good housekeeping and pollution prevention procedures, and stormwater pollution plans as appropriate; and*
 - v. The written training plan as required in Part I E 6 m [in the 2018 MS4 General Permit].*
2. For this minimum control measure, the Town of Ashland will implement the following programs:
- a. The Town has an Environmental Compliance Manual (ECM) which provides specific written instructions for the operations and maintenance activities at facilities owned or operated by the permittee, such as road, street, and parking lot maintenance; equipment maintenance; and the application, storage, transport, and disposal of pesticides, herbicides, and fertilizers designed to:
 - i. Prevent illicit discharges;
 - ii. Ensure the proper disposal of waste materials, including landscape wastes;
 - iii. Prevent the discharge of wastewater or permittee vehicle wash water or both into the MS4 without authorization under a separate VPDES permit;

- iv. Require implementation of best management practices when discharging water pumped from utility construction and maintenance activities;
 - v. Minimize the pollutants in stormwater runoff from bulk storage areas (e.g., salt storage, topsoil stockpiles) using best management practices;
 - vi. Prevent pollutant discharge into the MS4 from leaking municipal automobiles and equipment; and
 - vii. Ensure that the application of materials, including fertilizers and pesticides, is conducted
 - viii. in accordance with the manufacturer's recommendations.
 - b. A list of all high-priority facilities owned or operated by the permittee required in accordance with Part I E 6 c in the 2018 MS4 General Permit., and whether the facility has a high potential to discharge;
 - i. The Town Maintenance Facility at 100 Vaughan Road for which a site specific SWPPP is maintained and implemented.
 - c. Turf and landscape nutrient management. This is not required because the Town does not manage turf and landscaping that meets requirements in the 2018 MS4 General Permit.
 - d. The Town will develop a protocol for contractors working on behalf of the Town to assure they are implementing good housekeeping, prevention procedures and stormwater pollution plans.
 - e. The Town has a written training plan as required in Part I.E.6.m in the 2018 MS4 General Permit, which incorporated by reference into this program plan and is available for review by DEQ or the public upon request.
3. The Town of Ashland maintains the following facilities within the program area: The Town Hall, Town Hall Public Works Annex (former Fire Station), Town Police Station, Town maintenance facility, and seven recreational parks. For this minimum control measure, the Town of Ashland will implement the following programs:
- a. The Environmental Compliance Manual (ECM) provides specific instructions as to how to store, transfer, dispose or otherwise manage potentially hazardous and non-hazardous waste. The ECM covers waste materials management procedures for every activity associated with the following: Maintenance Shop Facility, Roadside Development/Landscape Facility, Fuel Storage and Dispensing Facility, Traffic Engineering Warehouse Facility, Hazardous Waste Storage Building Facility, Office Supplies Management Toner Storage Area, and Highway Chemical Storage/Handling Area. The intent of the ECM is to provide a safe work place and a protected environment by:
 - 1. Training site personnel
 - 2. Identifying people who will provide help and information
 - 3. Identifying waste generating activities
 - 4. Teaching special handling methods
 - 5. Providing special storage requirements
 - 6. Explaining how to manage spills
 - 7. Preparing for site inspections and audits
 - 8. Showing how to keep good records
 - b. The Town operates a street sweeping program. The Town keeps track of the hours and/or miles of sweeping completed on a weekly basis, and the volume of debris collected.
 - c. The Town collects leaves, brush and grass clippings throughout the year. Leaves and brush are composted or chipped into mulch for reuse by a hired contractor.

- d. The Town has two salt/material storage buildings to prevent stored salts and other materials from running off into surface water. One storage building contains only salt or snow melt material, the other a sand salt mix.
- e. The Town has a vehicle washing facility, which is drains to public sanitary sewer. Town vehicles are washed in this facility. The sand interceptor and the oil-water separator in the vehicle washing facility are inspected and pumped out regularly.
- f. The Town continues to keep records of the maintenance program activities at the Town Maintenance Facility.
- g. Based on the criteria in the General Permit Part I.E.6.c., the Town identified the Town maintenance facility as the only municipal high-priority facility within the Town.
- h. Turf and landscape management. This is not required because the Town does not manage turf and landscaping that meets requirements in the 2013 MS4 General Permit.
- i. Training Schedule and Program.
 - The Town continues to conduct training for employees. The training requirements may be fulfilled, in total or in part, through regional training programs involving two or more MS4 localities provided. Training is not required if the topic is not applicable to the Town's operations. Non-applicable topics include:
 1. Emergency response is handled by Hanover County.
 2. Water and sanitary sewer facilities are handled by Hanover County.
 - The Town continues to identify and document the applicable employees or positions to receive each type of training.
 - The Town developed an annual written training plan including a schedule of training events that ensures implementation of the training requirements as follows:
 1. Field personnel receive training in the recognition and reporting of illicit discharges no less than once per 24 months.
 2. Employees performing road, street, and parking lot maintenance receive training in pollution prevention and good housekeeping associated with those activities no less than once per 24 months.
 3. Employees working in and around maintenance, public works, or recreational facilities receive training in good housekeeping and pollution prevention practices associated with those facilities no less than once per 24 months.
 4. Employees and contractors hired by the permittee who apply pesticides and herbicides are trained or certified in accordance with the Virginia Pesticide Control Act (§ 3.2-3900 et seq. of the Code of Virginia). Certification by the Virginia Department of Agriculture and Consumer Services (VCACS) Pesticide and Herbicide Applicator program shall constitute compliance with this requirement.
 5. Employees and contractors serving as plan reviewers, inspectors, program administrators, and construction site operators obtain the appropriate certifications as required under the Virginia Erosion and Sediment Control Law and its attendant regulations.
 6. Employees and contractors implementing the stormwater program obtain the appropriate certifications as required under the Virginia Stormwater Management Act and its attendant regulations.
 7. Ensure that applicable employees obtain the appropriate certifications as required under the Virginia Erosion and Sediment Control Law and its attendant regulations.
 8. Employees whose duties include emergency response have been trained in spill response. Training of emergency responders such as firefighters and law-enforcement officers on the handling of spill releases as part of a larger

emergency response training shall satisfy this training requirement and be documented in the training plan. However, emergency response is handled by Hanover County

9. Keep documentation on each training event including the training date, the number of employees attending the training, and the objective of the training event for a period of three years after each training event.

4. Measurable goals and target dates are listed in the chart below:

Compliance Period	Measurable Goals
Year 1 2018-2019	<ul style="list-style-type: none"> ○ 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. ○ Continue implementing stormwater pollution prevention plan (SWPPP) for the Town Maintenance Facility on Vaughan Road based on the criteria in the 2018 General Permit.
Year 2 2019-2020	<ul style="list-style-type: none"> ○ 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. ○ Continue implementing stormwater pollution prevention plan (SWPPP) for the Town Maintenance Facility on Vaughan Road based on the criteria in the 2018 General Permit.
Year 3 2020-2021	<ul style="list-style-type: none"> ○ 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. ○ Continue implementing stormwater pollution prevention plan (SWPPP) for the Town Maintenance Facility on Vaughan Road based on the criteria in the 2018 General Permit.
Year 4 2021-2022	<ul style="list-style-type: none"> ○ 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. ○ Continue implementing stormwater pollution prevention plan (SWPPP) for the Town Maintenance Facility on Vaughan Road based on the criteria in the 2018 General Permit.
Year 5 2022-2023	<ul style="list-style-type: none"> ○ 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. ○ Continue implementing stormwater pollution prevention plan (SWPPP) for the Town Maintenance Facility on Vaughan Road based on the criteria in the 2018 General Permit.

G. Middle Pamunkey River TMDL (formerly Mechumps Creek) TMDL for E. coli

1. The Virginia Department of Environmental Quality (DEQ) assigned a Total Maximum Daily Load (TMDL) of 3.08×10^{13} cfu/yr and a non-point source Load Allocation (LA) of 2.98×10^{13} cfu/yr for E. coli bacteria to Mechumps Creek. This TMDL and LA were established in a document entitled "Bacteria TMDL for Mechumps Creek, Hanover County, Virginia – Submitted by Virginia Department of Environmental Quality – October 2004 (Revised)." This section was added to the Town of Ashland's MS4 Program Plan to include measurable goals, schedules, and strategies to address the Total Maximum Daily Load (TMDL) Load Allocation (LA).

The Mechumps Creek TMDL for E. coli was superseded by the Middle Pamunkey River TMDL of 1.08×10^{15} cfu/yr for E. coli bacteria. The MS4 Town of Ashland and the MS4 VDOT in Hanover County share an aggregated non-point source Waste Load Allocation (WLA) of 1.83×10^{12} cfu/yr for E. coli bacteria. This TMDL and WLA were established in a document entitled "E. coli TMDL Development for the Pamunkey River and Tributaries, Virginia – Prepared for: Virginia Department of Environmental Quality – Final Submitted: July 2014."

2. The following are measurable goals, schedules, strategies, and other best management practices (BMPs) the Town currently uses and will continue or plans to implement to assure consistency with the approved TMDL:
 - a. The following items, which are applicable to reducing the E. Coli, are currently in place in the Town of Ashland:
 - i. Program to educate pet owners about picking up pet waste.
 - ii. Provide pet waste bags and receptacles at parks and other locations around Ashland.
 - iii. Municipal Separate Storm Sewer System (MS-4) Management Program Ordinance addresses illicit discharges
 - iv. Street Sweeping
 - v. Leaf and Brush Collecting
 - vi. The Town performs dry weather monitoring for detecting illicit discharges.
 - vii. The Town performs TV monitoring of storm sewers to detect cross connections
 - viii. Hanover County Department of Public Utilities (which owns water and sanitary sewer utilities in Ashland) has been repairing and lining sanitary sewers in the Town to prevent inflow and infiltration (I&I), as well as leaking sanitary sewer lines.
 - ix. The Ashland Police Department regularly disbands homeless camps along Mechumps Creek. The homeless people, who camp along the creek, dispose of human and solid waste in the creek.
 - b. The Town continues to evaluate these existing ordinances, BMPs, programs, policies, plans, and procedures regularly to determine their effectiveness in reducing E. coli bacteria in Mechumps Creek. The evaluation will identify weakness or limitation in reducing E. coli bacteria in a manner consistent with the TMDL.
 - c. After each evaluation, the Town will develop a schedule to implement procedures and strategies that address weaknesses in the program. The schedule may include, but not be limited to, timetables to update existing ordinances and other legal authorities within two years of the issuance of the

current MS4 Phase II General Permit, BMPs, policies, plans, procedures and contracts that will better address E. coli in Mechumps Creek. Eliminating the source of E. coli will be the priority wherever possible.

- d. The Town will implement these schedules to the best of its ability.
3. The Town has developed and implements outfall reconnaissance procedures to identify potential sources of the E. coli bacteria from anthropogenic activities. The Town will conduct future reconnaissance in accordance with the following:
 - a. Inspect the Town’s MS4 outfalls as outlined in the Illicit Discharge Detection and Elimination Procedures, Town of Ashland, June 2014. Keep records and report as specified.
 4. The Town conducts an annual characterization that estimates the volume of stormwater discharged, in cubic feet, and the quantity of E. coli bacteria discharged by the MS4 to Mechumps Creek.
 5. As part of the annual evaluation, the Town will update its MS4 Program Plan to include any new information regarding the TMDL in order to ensure consistency with the TMDL.
 6. Along with other MS4 reporting requirements, the Town will include the following with each annual report:
 - a. Copies of any updates to the MS4 Program Plan completed during the reporting cycle and any new information regarding the TMDL in order to evaluate its ability to assure the consistency of its discharge with the assumptions of the TMDL WLA.
 - b. The estimate of the volume of stormwater discharged, in cubic feet, and the quantity of E. coli bacteria discharged by the Town’s MS4 to Mechumps Creek.
 7. The Town will develop and implement an action plan for E. coli TMDL Development for The Pamunkey River and Tributaries in accordance with Part II B in the 2018 MS4 General Permit.
 - a. The Town will develop and initiate implementation of the action plan no later than May 1, 2021.
 - b. The Town will select and implement at least three of the strategies listed in Table 5 in Part II B, in the 2018 MS4 General Permit, designed to reduce the load of bacteria to the MS4.

8. Measurable goals and target dates are listed in the chart below:

Compliance Period	Measurable Goals
Year 1 2018-2019	<ul style="list-style-type: none"> ○ Update MS4 Program 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.
Year 2 2019-2020	<ul style="list-style-type: none"> ○ Update MS4 Program 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. ○ Develop and write TMDL action plan for Middle Pamunkey River TMDL for E. coli.
Year 3 2020-2021	<ul style="list-style-type: none"> ○ Continue investigating sources of E. coli bacteria. ○ Estimate volume of stormwater and the quantity of E. coli discharged to Mechumps Creek. ○ Submit and initiate implementation of TMDL Action plan. ○ Report to DEQ as required.
Year 4 2021-2022	<ul style="list-style-type: none"> ○ Continue investigating sources of E. coli bacteria. ○ Estimate volume of stormwater and the quantity of E. coli discharged to Mechumps Creek. ○ Implement items in TMDL Action Plan as required. ○ Report to DEQ as required.
Year 5 2022-2023	<ul style="list-style-type: none"> ○ Continue investigating sources of E. coli bacteria. ○ Estimate volume of stormwater and the quantity of E. coli discharged to Mechumps Creek. ○ Implement items in TMDL Action Plan as required. ○ Report to DEQ as required.

H. Chesapeake Bay TMDL Action Plan

1. The Town developed a TMDL Action Plan in accordance with Section I.C of the 2013 MS4 General Permit.
 - a. The Town of Ashland Chesapeake Bay TMDL Action Plan, June 30, 2015, may be viewed on the Town's website at <http://www.ashlandva.gov/DocumentCenter/View/764/ChesapeakeBayTMDLActionPlan?bidId=>.
 - b. Chesapeake Bay TMDL Action Plan implementation. The Town will continue to implement the TMDL Action Plan according to the schedule therein.
 - c. The Town will update the Chesapeake Bay TMDL Action Plan in accordance with Part II A in the 2018 MS4 General Permit.
 - d. The Town will submit an updated Chesapeake Bay TMDL Action Plan no later than November 1, 2019.
 - e. Prior to submittal of the updated Chesapeake Bay TMDL Action Plan, the Town will provide an opportunity for public comment on the additional BMPs proposed to meet the reductions not previously approved by DEQ in the first phase Chesapeake Bay TMDL action plan for no less than 15 days.

2. Measurable goals and target dates are listed in the chart below:

Year 1 2018-2019	<ul style="list-style-type: none"> ○ Implement items in TMDL Action Plan as required. ○ Report to DEQ as required.
Year 2 2019-2020	<ul style="list-style-type: none"> ○ Implement items in TMDL Action Plan as required. ○ Submit and implement updated Chesapeake Bay TMDL Action plan. ○ Report to DEQ as required.
Year 3 2020-2021	<ul style="list-style-type: none"> ○ Implement items in TMDL Action Plan as required. ○ Report to DEQ as required.
Year 4 2021-2022	<ul style="list-style-type: none"> ○ Implement items in TMDL Action Plan as required. ○ Report to DEQ as required.
Year 5 2022-2023	<ul style="list-style-type: none"> ○ Implement items in TMDL Action Plan as required. ○ Report to DEQ as required.

I. Chickahominy River and Tributaries TMDL Action Plan

1. The Town developed a TMDL Action Plan in accordance with Section I.B of the 2013 MS4 General Permit.
 - c. The E. coli Bacteria TMDL Action Plan for Chickahominy River, Town of Ashland, Permit No. VAR040011, November 2016, may be viewed on the Town’s website at <http://www.ashlandva.gov/DocumentCenter/View/2206/Chickahominy-TMDL-Action-Plan?bidId=>.
 - d. Chickahominy River TMDL Action Plan implementation. The Town will continue to implement the TMDL Action Plan according to the schedule therein.
 - e. The Town will update the E. coli Bacteria TMDL Action Plan for Chickahominy River in accordance with Part II B in the 2018 MS4 General Permit.
 - f. The Town will submit an updated E. coli Bacteria TMDL Action Plan for the Chickahominy River no later than May 1, 2020.
 - g. The Town shall select and implement at least three of the strategies listed in Table 5 in Part II B, in the 2018 MS4 General Permit, designed to reduce the load of bacteria to the MS4.

2. Measurable goals and target dates are listed in the chart below:

Year 1 2018-2019	<ul style="list-style-type: none"> ○ Implement items in TMDL Action Plan as required. ○ Report to DEQ as required.
Year 2 2019-2020	<ul style="list-style-type: none"> ○ Implement items in TMDL Action Plan as required. ○ Report to DEQ as required. ○ Develop and implement updated TMDL action plan for Chickahominy River TMDL for E. coli.
Year 3 2020-2021	<ul style="list-style-type: none"> ○ Implement items in TMDL Action Plan as required. ○ Report to DEQ as required.

Year 4 2021-2022	<ul style="list-style-type: none">○ Implement items in TMDL Action Plan as required.○ Report to DEQ as required.
Year 5 2022-2023	<ul style="list-style-type: none">○ Implement items in TMDL Action Plan as required.○ Report to DEQ as required.

SECTION 2
PERFORMANCE SCHEDULE

2.1 Evaluation of Program

The Town of Ashland is required to evaluate and assess its own storm water management program.

A. Annual Reports

1. The Town of Ashland must submit an annual report to the department no later than October 1 of each year in a format as specified by the department. The report shall cover the previous year from July 1 to June 30. The annual report shall include the following general information:
 - a. The permittee, system name, and permit number;
 - b. The reporting period for which the annual report is being submitted;
 - c. A signed certification as per Part III K in the 2018 MS4 General Permit;
 - d. Each annual reporting item as specified in an MCM in Part I E in the 2018 MS4 General Permit; and
 - a. An evaluation of the MS4 program implementation, including a review of each MCM, to determine the MS4 program's effectiveness and whether or not changes to the MS4 program plan are necessary.

2.2 Monitoring

Stormwater discharges and BMPs are not required to be monitored for this permit.

2.3 Duty to Reapply

If the Town of Ashland wishes to continue an activity regulated by this permit after the expiration date of this permit, the Town must submit a new registration statement at least 90 days before the expiration date of the existing permit, unless permission for a later date has been granted by the Virginia State Water Control Board.