

## **MS4 Program Plan**

City of Radford, Virginia

The following is a list of the six minimum control measures along with specific BMP's proposed by the City of Radford to be implemented as part of the MS4 program requirements:

### **Minimum Control Measure #1 Public Education and Outreach**

Program requirements:

- Increase knowledge of citizens about the steps they can take to reduce stormwater pollution with emphasis on reducing impacts to impaired waters and other local water pollution concerns;
- Increase knowledge of citizens about hazards associated with illegal discharges and improper disposal of waste
- Implement strategies that are targeted toward audiences (commercial, industrial and institutional entities) most likely to have significant stormwater impacts

### **Minimum Control Measure #2 Public Involvement and Participation**

Program requirements:

- Maintain an updated MS4 Program Plan with updates occurring, as a minimum, once per year in conjunction with an annual report. The updated Program Plan and annual report shall be posted on the City's website within 30 days of submittal.
- Provide for the public availability of the MS4 Program Plan for public review and comment.
- Participate in local activities aimed at increasing public involvement in reducing impacts to stormwater and improving water quality.

**The City of Radford has chosen to combine MCMs 1&2 under this Program Plan.**

#### **BMP 2.1 – Pet Waste Management for Public Parks**

The City will continue to raise awareness and enforce current policies requiring pet owners to clean up after their animals while in public parks. (Website info, newsletter, literature? Part of licensing procedure?)

**Schedule and Evaluation:** The City will continue to implement current policies during next permit cycle. During the first year of the permit cycle, the City will evaluate the effectiveness of the BMP and propose any improvements for year 2.

**Responsible Party:** Radford Parks and Recreation

**Necessary Documents:** Literature handed out during licensing process, website, City newsletter.

**Measurable Goals:** The City will gather information about the effectiveness of current Pet Waste Management policies and develop ways to improve the policies and increase awareness.

**Items to be included in Annual Report:** Copies of updated written policies and literature.

### **BMP 2.2 – Identify high priority water quality issues**

The City has identified 3 issues affecting water quality that will be considered high priorities. These issues are: yard waste, road salt storage and stream bank remediation. Programs have been in place to deal with these issues. However, the City will formalize and strengthen efforts to address each issue. These efforts will include identifying the group having the most impact on each, continuing to develop relevant outreach materials and develop activities to raise awareness.

**Schedule and Evaluation:** During the first year of the permit cycle, the City will continue to implement the programs currently in place while evaluating the effectiveness of the programs. Needed improvements will be identified and strategies to implement the improvements will be formulated by the end of the first year. In year 2, the improvements will be implemented.

**Responsible Party:** City Engineer

**Necessary Documents:** Written policies and procedures

**Measureable Goals:** The City will gather information about the effectiveness of the current programs and develop ways to improve and increase awareness.

**Items to be included in the Annual Report:** Written narrative describing the results of the evaluation and improvements that were identified.

### **BMP 2.3 – Drain Marking Program**

The City will implement a storm drain marking program. This will involve performing an inventory of the storm drain locations and identifying the drains most easily accessible to the public and that may be vulnerable to illicit dumping. These drains will be considered good candidates for permanent marking.

**Schedule and Evaluation:** It is anticipated that the drain marking program will be a parallel activity with the mapping of the City's storm network. During the first year of the permit cycle,

25% of the mapping and drain inventory will be completed. Permanent drain markers will be installed as the drains are identified.

**Responsible Party:** City Engineer

**Necessary documents:** Storm drain inventory

**Measurable Goals:** Completion of the storm drain inventory and identifying the most vulnerable drains.

**Items to be included in the Annual Report:** Storm drain inventory documentation and a summary of the progress.

#### **BMP 2.4 – Enhance City website to include stormwater related information**

The City's website will be enhanced to make stormwater related information available to the General Public. Included will be links to the relevant sections of the Virginia DEQ and EPA websites. Also included will be links to the City's relevant ordinances and the MS4 Program Plan and annual reports.

**Schedule and Evaluation:** The City website will be updated during the first year of the permit cycle.

**Responsible Party:** City Engineer

**Necessary Documents:** Information described above.

**Measurable Goals:** An up to date and relevant website.

**Items to be included in the Annual Report:** A summary of the updates and/or changes to the website.

#### **BMP 2.5 – Annual stream clean-up events**

The City will sponsor, at least once per year, an event that encourages public participation in cleaning up the streams within the City Limits. Emphasis is placed on removing foreign debris, litter, etc. The event will be publicized through various media in order to have as much participation as possible.

**Schedule and Evaluation:** This is an activity that the City has been sponsoring for a number of years. This will continue, but with an increased emphasis. During the first year of the permit cycle, the City will identify ways to increase awareness of the event in order to improve participation.

**Responsible Party:** City Engineer

**Necessary Documents:** Website, newsletter, mailings

**Measurable Goals:** At least one stream clean-up event per year

**Items to be included in the Annual Report:** A summary of the stream clean-up event and its accomplishments

### **Minimum Control Measure #3 Illicit Discharge Detection and Elimination**

Permit requirements: Implement, through ordinance, a program to detect, identify and address unauthorized non-stormwater discharges to the small MS4. In addition, the City will maintain an accurate mapping of the storm sewer system including the location of all MS4 outfalls.

#### **BMP 3.1 – Implement Stormwater Ordinance**

The City will implement a Stormwater Ordinance that will prohibit illegal and illicit dumping of non-stormwater discharges. The ordinance, at a minimum, will address detection, identification of source of discharge, mechanisms to eliminate discharges, and tracking. The ordinance will facilitate public reporting of illicit discharges.

**Schedule and Evaluation:** The city is in the process of developing a Stormwater Ordinance. A draft is anticipated in July 2014. During the first year of the permit cycle, this ordinance will be fully developed and implemented through the City's formal public approval process.

**Responsible Party:** City Engineer/City Manager

**Necessary Documents:** Stormwater Ordinance

**Measurable Goals:** Proceed with the process of adopting the Stormwater Ordinance into the City Code

**Items to be included in the Annual Report:** A summary of number of outfalls screened during the period, screening results, and details of follow-up actions. Summaries of any investigations of suspected illicit discharges will also be included.

### **BMP 3.2 – Protect Sensitive Areas by use of City Code**

The City has adopted by Ordinance two “overlay districts” (Floodplain Overlay District and Riverfront Corridor Overlay District) within the City Code that protects areas within the floodplain and adjacent to the New River. (Division 15 and 16 of Chapter 120.1: Zoning)

**Schedule and Evaluation:** The City will continue to enforce these ordinances during the years of the permit cycle.

**Responsible Party:** Zoning Administrator, City Engineer, City Manager

**Necessary Documents:** Zoning Overlay Districts defined in City Code

**Measurable Goals:** Enforce ordinance sections that control development in sensitive areas

**Items to be included in the Annual Report:** Copies of the Overlay Districts with any changes highlighted.

### **Minimum Control Measure #4 Construction Site Runoff Control**

Program requirements: Implement, by ordinance, procedures to reduce pollutants generated by runoff from construction activities that result in land disturbance of areas greater than 10,000 square feet. The local ordinance may require an erosion and sediment control plan for areas less than the minimum. In addition, the local ordinance may allow for an agreement in lieu of a plan for individual residential development meeting certain criteria.

#### **BMP 4.1 – Erosion and Sediment Control Ordinance**

Adopt and maintain an ordinance in the City Code that requires compliance with the Virginia Erosion and Sediment Control regulations.

**Schedule and Evaluation:** The City has implemented an Erosion and Sediment Control ordinance (Chapter 31, Articles 1 &2) that is in compliance with the Virginia Erosion & Sediment Control regulations, requires a permit prior to beginning land disturbance, provides for inspection of land disturbing activities by the City and details available enforcement options.

**Responsible Party:** City Engineer

**Necessary Documents:** Erosion & Sediment Control ordinance, Land Disturbance Permit

**Measurable Goals:** Enforce the ordinance

**Items to be included in the Annual Report:** Number of plans approved, total number of construction sites observed, number of acres disturbed, number of inspections conducted, summary of enforcement actions taken.

**BMP 4.2 – City Staff Training**

The City staff that is involved in implementing the E&S Control Ordinance will maintain the appropriate VA DEQ certifications.

**Schedule and Evaluation:** The City will maintain a database of the certifications required of City employees. The database includes the type of certification, name of employee, expiration date of current certifications.

**Responsible Party:** City Engineer

**Necessary Documents:** Copies of certification documentation

**Measurable Goals:** All appropriate staff will maintain required certifications

**Items to be included in the Annual Report:** Total number of certified employees along with the certifications for each.

**Minimum Control Measure #5  
Post Construction Stormwater Management**

Permit requirements: Develop and enforce a program to reduce the volume and improve quality of post-construction runoff from development with land disturbance defined as large construction activities or small activities in 4VAC50-60-10.

**BMP 5.1 – Adopt a Stormwater Ordinance to control impacts of runoff**

The City will implement a Stormwater Ordinance that will address both post-construction stormwater management and illicit discharges. The ordinance, at a minimum, will comply with the Virginia Stormwater Management Program regulations.

**Schedule and Evaluation:** The city is in the process of developing a Stormwater Ordinance. A draft is anticipated in July 2014. During the first year of the permit cycle, this ordinance will be fully developed and implemented through the City's formal public approval process.

**Responsible Party:** City Engineer/City Manager

**Necessary Documents:** Stormwater Ordinance

**Measurable Goals:** Proceed with the process of adopting the Stormwater Ordinance into the City Code

**Items to be included in the Annual Report:** A copy of the Stormwater Ordinance and a summary of progress for implementation.

## **Minimum Control Measure #6 Pollution Prevention/Good Housekeeping**

Program requirements: Develop and implement a program to prevent and reduce pollutant runoff from municipal operations into the storm sewer system.

### **BMP 6.1 – Employee Training**

The City will implement an employee training program designed to raise awareness within city employees of stormwater management practices as it relates to specific tasks and assignments.

**Schedule and Evaluation:** Specific training program will be developed within first year of the permit cycle. Once the program is implemented, employees will participate in training at least annually.

**Responsible Party:** City Engineer/City Manager

**Necessary Documents:** Training materials and documentation of attendance at training sessions.

**Measurable Goals:** Each employee will participate in at least one training session per year.

**Items to be included in the Annual Report:** Number of employees attending training along with dates of attendance.

### **BMP 6.2 – Controls for reducing the discharge of pollutants from City-owned facilities and property.**

The City will continue to evaluate its operations and facilities for ways to reduce discharge of pollutants. This evaluation will include identifying potential sources of pollution, identifying and prioritizing problem areas, and determining methods to address and correct the problems. Some of these methods might include employee training, spill prevention plans, SWPPPs, implementing new procedures, etc.

**Schedule and Evaluation:** Evaluation will be ongoing throughout the permit cycle. 25% of SWPPPs will be developed within the first year of the permit cycle.

**Responsible Party:** City Engineer/City Manager

**Necessary Documents:** SWPPPs, spill prevention plans, operating procedures

**Measurable Goals:** Continue program through the years of the permit cycle.

**Items to be included in the Annual Report:** Status of evaluations, new procedures implements, updated SWPPS, training records.

**BMP 6.3 – Reduce the amount of solid waste from City-owned facilities by encouraging employees to recycle waste.**

The City has an active recycling program that encourages City employees to participate. This program will continue and be evaluated for ways to improve and expand the program.

**Schedule and Evaluation:** The City will continue to recycle all categories of waste during all years of the permit cycle.

**Responsible Party:** City Engineer/City Manager

**Necessary Documents:** Recycling Program Plan, tonnage reports

**Measurable Goals:** Continue program, including training, through the years of the permit cycle.

**Items to be included in the Annual Report:** Tonnages reports of recycled material.