

MS4 Program Plan

Permit # VAR040135

Stormwater Discharge From Small Municipal Separate Storm Sewer Systems

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Report submitted by:

David Ridpath – City Manager

City of Radford, Virginia

10 Robertson, Street

Radford, VA 24141

P: 540.731.3603

David.Ridpath@radfordva.gov

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APPENDIX

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<https://www.radfordva.gov/1275/Resources>

- A. MS4 Organization Structure

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- E. Illicit Discharge and Detention Elimination Ordinance
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City of Radford MS4 Illicit Discharge Program Dry Weather Screening
MS4 Outfall Field Screening Inspection Report
Illicit Discharge Incident Tracking Sheet
Illicit Discharge Incident Report 2018-1

- F. Erosion and Sediment Control Ordinance
Radford VSMP Administrative Guidance Manual (Plan Review Procedures)
Radford Erosion and Sediment Control Inspection Process/Procedures

City of Radford Erosion and Sediment Plan Inspection Report
Radford Erosion & Sediment Control Compliance and Enforcement Procedure

- G. Stormwater Management Ordinance
 - Long-Term Stormwater Management Facility Maintenance Agreement
 - Radford Inspecting Stormwater Management Facilities SOP

- H. City of Radford BMP Inspection Form
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- J. Standard Operating Procedures
 - 1. Asphalt Program
 - 2. Building Maintenance
 - 3. Detention Pond Maintenance
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1.0 EXECUTIVE SUMMARY

The City of Radford is committed to the development, refinement, implementation, and enforcement of a Municipal Separate Storm Sewer System (MS4) Program Plan (Plan) to reduce the discharge of pollutants from the regulated MS4 (urbanized areas of the City) to the maximum extent practicable (MEP), as per VPDES Permit No. VAR040135. The focus of the proposed program will be to 1) protect water quality, 2) improve waters into which the regulated small MS4 discharges, and 3) meet the requirements of state and federal regulations.

The City of Radford's MS4 Organizational Structure, Version 1 dated 09/20/2018, is provided in Appendix A.

The City of Radford MS4 Program Plan includes and addresses the following minimum control measures (MCMs) and schedule for implementation:

- (1) Public Education and Outreach on Stormwater Impacts
- (2) Public Involvement and Participation
- (3) Illicit Discharge Detection and Elimination
- (4) Construction Site Stormwater Runoff Control
- (5) Post-Construction Runoff Control Management
- (6) Pollution Prevention and Good Housekeeping for Municipal Operations

Additionally, the Plan also address special conditions for approved total maximum daily loads (TMDL), when a wasteload allocation (WLA) is assigned to the City of Radford. Currently, there are no applicable WLAs assigned to the City. Any modifications to this Program Plan will be documented as part of the annual report submittals.

Included with this document is a summary of the MCMs and proposed BMPs; a list of supporting documents, existing policies, ordinances, schedules, inspection forms, written procedures, and other documents necessary for BMP implementation; the responsible parties; the objectives and expected results of each BMP; implementation schedule of each BMP; and a method that will be utilized to determine the effectiveness of each BMP.

2.0 MCM 1: PUBLIC EDUCATION & OUTREACH

This minimum control measure is intended to implement a diverse public education program to increase target audience knowledge about the steps that can be taken to reduce stormwater pollution and hazards associated with illegal discharges and improper disposal of waste.

The City of Radford MS4 Program Plan for MCM 1 will be is developed to encourage the following outcomes.

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.
3. Implement a diverse program with strategies that are targeted toward individuals or groups most likely to have significant stormwater impacts.

BMP 1.1 – Identify High Priority Water Quality Issues

The City identified three (3) high-priority water quality issues with the associated strategies for Public Education and Outreach provided in Table 1-1.

Table 1-1

High Priority Water Quality Issues	Strategies Employed	Specific Strategies
Proper disposal of pet waste	1. Traditional written materials 2. Curriculum materials	1. "Scoop the Poop" and "Be the Solution to Stormwater Pollution" brochure 2. Youth / Citizen stormwater education materials "Only Rain in the Drain" 3. Scavenger hunt / T-shirt
Collection of yard waste and leaf debris	1. Traditional written materials 2. Curriculum materials 3. Alternative materials (t-shirt)	1. "Be the Solution to Stormwater Pollution" brochure 2. Youth / Citizen stormwater education materials "Only Rain in the Drain" 3. Scavenger hunt / t-shirt
Nutrient management education	1. Traditional written materials	1. "Be the Solution to Stormwater Pollution" and "Resident's Guide for a Cleaner Environment" brochure

1. Pet Waste Disposal: "Scoop the Poop" Brochure

- a. Rationale and Description of Positive Impact on Stormwater Discharges: This program raises awareness of the need for proper disposal of pet waste to avoid release of bacteria into the stormwater system and, in turn, the New River.
- b. Target Public Audience
 - i. Pet Owners in the City of Radford
 - ii. Public Park Users in the City of Radford
 - iii. Dog Park Users in the City of Radford
- c. Time Period for Public Communication: The "Scoop the Poop" brochure is available daily at the following locations, and at special events.
 - i. Treasurer's Office following purchase of dog tags
 - ii. Local veterinarian offices on bulletin boards
 - iii. City buildings, including: City Administration, Recreation Center, Library, Courthouse
 - iv. City's Website
- d. Measurable Goal: Increase the distribution of materials 2% over the prior year through social media venues and distribution at City events and festivals. In permit year 2020-2021 9000 brochures were distributed with water bill annually.

2. Yard Waste and Leaf Debris: "Be the Solution to Stormwater Pollution"

- a. Rationale and Description of Positive Impact on Stormwater Discharges: This program educates citizens about proper disposal of yard waste (grass clippings, leaves, etc.) to reduce the amount of such waste discarded into the City's storm sewer drains. In addition, the City collects yard waste as part of a composting program that develops topsoil for City use. These educational materials help reduce clogging in the storm sewer network and reduce pollutants (i.e. fertilizers, herbicides, and pesticides) from entering the storm sewer network.
- b. Target Public Audience
 - i. Homeowners in the City of Radford
 - ii. Renters in the City of Radford
 - iii. Landscapers in the City of Radford
- c. Time Period for Public Communication: Educational materials are available daily at the following locations, and at special events.
 - i. City buildings, including: City Administration, Recreation Center, Library, Courthouse
 - ii. City's website
- d. Measurable Goal: Increase the distribution of materials 2% over the prior year through social media venues and distribution at City events and festivals. Permit year 2020-2021 9000 brochures were distributed with water bill annually.

3. Nutrient Management: “Resident’s Guide for a Cleaner Environment” Brochure

- a. Rationale and Description of Positive Impact on Stormwater Discharges: This brochure informs City staff and citizens of good nutrient management practices that will help reduce pollutants (i.e. fertilizers, herbicides, and pesticides) from entering the storm sewer network and ultimately the New River.
- b. Target Public Audience
 - i. City staff
 - ii. Homeowners in the City of Radford
 - iii. Renters in the City of Radford
 - iv. Landscapers in the City of Radford
- c. Time Period for Public Communication: The brochure is available daily at the following locations, and at special events.
 - i. City buildings, including: City Administration, Recreation Center, Library, Courthouse
 - ii. City’s website
- d. Measurable Goal: Increase the distribution of materials 2% over the prior year through social media venues and distribution at City events and festivals. Permit year 2020-2021 9000 brochures were distributed with water bill annually.

4. General Stormwater

- a. Youth Stormwater Education: “Only Rain in the Drain” Model, learning pages, and poster
This program raises awareness about the municipal stormwater system with Radford’s youth and citizens. Refer to Table 1-1 for the high priority stormwater issues covered by this strategy.
 - i. Rationale and Description of Positive Impact on Stormwater Discharges: This educational program informs City Elementary through High School aged students about the need for proper disposal of pet waste to avoid release of bacteria and yard waste / debris to help reduce clogging and reduce pollutants (i.e. fertilizers, herbicides, and pesticides) into the stormwater system and ultimately the New River.
 - ii. Target Public Audience: Elementary through High School-aged students, and citizens
 - iii. Time Period for Public Communication: This information is taught once a year to classes and materials are available daily at the libraries at 2 elementary schools, 1 intermediate school, and 1 high school. Additionally, the brochure is available daily at the City Administration/Public Safety building for all citizens.
 - iv. Measurable Goal: Continue teaching and update materials every other year, and distribute at City events and festivals.
- b. Scavenger Hunt: Scavenger Hunt to get children and youth out looking for stormwater related items in the City. For completing the scavenger hunt participants receive a Shirt, Key Chain and Bookmark.
 - i. Rationale and Description of Positive Impact on Stormwater Discharges: This educational program informs the City’s school-aged students about the need for proper disposal of pet waste to avoid release of bacteria and yard waste / debris to

help reduce clogging and reduce pollutants (i.e. fertilizers, herbicides, and pesticides) into the stormwater system and ultimately the New River.

- ii. Target Public Audience: Elementary through Intermediate aged students
- iii. Time Period for Public Communication: This event occurs every other year at 2 elementary schools and 1 intermediate school.
- iv. Measurable Goal: Continue teaching and update scavenger hunt objects yearly.

Responsible Party / City Contact: Engineering Department
<https://www.radfordva.gov/802/Stormwater-Management>
<https://www.radfordva.gov/1275/Resources>
540-617-7876

Supporting Documents: Appendix B

1. Scoop the Poop Brochure, Version 1 dated 09/30/2018
2. Be the Solution to Stormwater Pollution Poster, Version 1 dated 09/30/2018
3. Only Rain in the Drain Learning Pages, Version 1 dated 09/30/2018
4. Resident's Guide for a Cleaner Environment, Version 1 dated 09/30/2018

Items to be included in the Annual Report: A list of the high-priority stormwater issues the permittee addressed in the public education and outreach program, and a list of the strategies used to communicate each high-priority stormwater issue.

3.0 MCM 2: PUBLIC INVOLVEMENT/PARTICIPATION

This minimum control measure is intended to implement a program that encourages input from City residents about the City of Radford Stormwater Program.

The City of Radford MS4 Program Plan for MCM 2 is developed to offer the public opportunities to

1. Report potential illicit discharges, improper disposal, or spills to the MS4, complaints regarding land disturbing activities, or other potential stormwater pollution concerns;
2. Provide input on the permittee's MS4 program plan;
3. Receive public input or complaints;
4. Respond to public input received on the MS4 program plan or complaints; and
5. Maintain documentation of public input received on the MS4 program and associated MS4 program plan and the permittee's response.

BMP 2.0: City Website Stormwater Related Information

The City will continually update the website with stormwater related information and provide links for comments and reporting. The following information will be provided on the City's website <https://www.radfordva.gov/802/Stormwater-Management> as well as access to relevant sections of the Virginia DEQ and EPA websites, the City's relevant ordinances, MS4 Program Plan and annual reports.

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. Illicit Discharge Reporting: The City has a webpage designated for illicit discharge reporting. The website provides contact information and a form to directly report an illicit discharge. Each report will be investigated in accordance with the City of Radford Ordinance No. 1681 and responded to within five (5) business days.
5. Land-disturbing Complaints Reporting: The City has a webpage designated to report issues regarding land-disturbing activities. The website provides contact information and a form to report concerns. Each complaint will be reviewed and responded to within five (5) business days.
6. MS4 Program Public Input: The City has a webpage designated to MS4 Program public input. The website provides contact information and a form to directly provide input. Each comment will be reviewed and responded to within five (5) business days.
7. Other Stormwater Management Concerns: The City has a webpage designated to soliciting feedback / concerns. The website provides contact information and a form to directly provide input. Each comment will be reviewed and responded to within five (5) business days.

Measurable Goals: The City will update annually the information listed above, Virginia DEQ and EPA websites, and links to the City's relevant ordinances, MS4 Program Plan and annual reports, as changes require. Also the City will keep record of, respond to within 5 days, and report annually to DEQ any input / concerns from the public and the related follow-up action.

BMP 2.1: Restoration

- 1. Annual Stream Clean-up Events:** The City and its partner organizations will continue to sponsor clean up events that encourage the public to engage in cleaning up the streams, river and roadways within the City Limits. The program will focus on removing foreign debris, litter, etc. Events will be publicized through various media to have as much participation as possible.

Schedule: City and its partner organizations have been sponsoring these programs for several years. The City will continue to increase awareness of events to improve participation. Annual events include a regional river clean up and a Pathways cleanup events.

Measurable Goals: At least one stream clean-up event per year with at least 50 resident volunteer participants and gather at least 800 pounds of trash per year.

BMP 2.2: Educational Events

- 1. Native American Heritage Festival in Bisset Park:** This event addresses the pet waste disposal, yard waste and leaf debris, and nutrient management high-priority water quality issues. This is a City-sponsored event that includes a booth staffed by City employees to promote awareness of the City's stormwater initiatives and good land stewardship, and provide hand out literature and educational materials.
- 2. Radford Highlanders Festival in Bisset Park:** This event addresses the pet waste disposal, yard waste and leaf debris, and nutrient management high-priority water quality issues. This is a City-sponsored event that promotes river awareness and stormwater initiatives, including literature and educational materials. Portable "Doggie Spots" are placed through the event to encourage pet owners with their dogs present to clean up after their K-9.

Schedule: Each event occurs annually.

Measurable Goals: Increase the distribution of materials 2% over the prior year at each festival. Pre-COVID pandemic approximately 700 attended the Native American Heritage Festival and 5000 attended the Radford Highlanders Festival.

BMP 2.3: Pollution Prevention

- 1. Adopt A Spot Program Sign Ups:** This event addresses yard waste and leaf debris, and nutrient management high-priority water quality issues. This program encourages citizen

participation in litter cleanup of designated areas in their community at regular intervals to help keep pollutants from entering waterways.

Schedule: Year-round.

Measurable Goals: Of the 50 spots available, there are currently 27 spots adopted with 8 additional spots to be adopted within the City by June 30, 2023.

- 2. Pet Waste Management for Public Parks:** The City's Parks & Recreation Department enforces the current Pet Waste Management Program in the three heaviest used public park areas within the City's Park system: Bisset Park, Wildwood Park, and the William D. Lorton, Jr. "Sparky's Run" Dog Park. The Department will continue to evaluate the effectiveness of the program, adding or relocating the pet waste bag dispensers based on observations of their use and according to input received by the public.

Schedule: Year-round.

Measurable Goals: Increase frequency of pet waste bag removal by 5% annually.

- 3. Drain Marking Program:** The City implemented a Storm Drain Marking Program. This involved performing an inventory of the storm drain locations and identifying the drains most easily accessible to the public and vulnerable to illicit dumping.

Schedule: Year-round.

Measurable Goals: Mark new inlets within public rights-of-way within one-year of installation, and monitor 25% of the existing, marked inlets annually to determine whether re-marking is required.

Responsible Party: City's Engineering Department

Supporting Documents: Appendix C

1. Effective MS4 permit and coverage letter.

Items to be included in the Annual Report:

2. A summary of any public input on the MS4 program received (including stormwater
3. complaints) and how the permittee responded.
4. A webpage address to the permittee's MS4 program and stormwater website.
5. A description of the public involvement activities implemented by the permittee.
6. A report of the metric as defined for each activity and an evaluation as to whether or not the activity is beneficial to improving water quality.
7. The name of other MS4 permittees with whom the permittee collaborated in the public involvement opportunities.

4.0 MCM 3: ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE)

This minimum control measure is intended to detect and eliminate illicit discharges to the MS4 storm system.

The City of Radford developed the MS4 Program Plan for MCM 3 to include the following information.

1. The MS4 map and information table by reference.
2. Copies of written notifications of new physical interconnections given by the permittee to other MS4s.
3. The IDDE procedures described in Part I E 3 c.

BMP 3-1: Outfall Map and Database

The City developed and will maintain and update a Outfall Map and Database to include the following information as required by the MS4 General Permit (9VAC25-890-40).

1. A unique identifier as specified on the storm sewer system map;
2. The latitude and longitude of the outfall or point of discharge;
3. The estimated regulated acreage draining to the outfall or point of discharge;
4. The name of the receiving water;
5. The 6th Order Hydrologic Unit Code of the receiving water;
6. 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;
7. The predominant land use for each outfall discharging to an impaired water; and
8. The name of any EPA approved TMDLs for which the permittee is assigned a wasteload allocation.

Measurable Goals: Update the outfall map with any new outfalls added during the reporting year.

BMP 3-1: Illicit Discharge Ordinance

The City established a program to detect and eliminate illicit discharges in to the Municipal Separate Storm Sewer System by developing and adopting regulations and an enforcement program to prevent illegal discharges into the MS4 storm drain system.

The City implemented an Illicit Discharge Detection and Elimination Ordinance 1681 that prohibits illegal and illicit dumping of non-stormwater discharges. The ordinance addresses detection, identification of source of discharge, mechanisms to eliminate discharges, and tracking. The ordinance facilitates public reporting of illicit discharges.

Measurable Goals: Continued enforcement of Ordinance 1681.

Responsible Party: City's Engineering Department

Supporting Documents:

Appendix D

1. City of Radford MS4 Outfall, Version 2, 2021
2. City of Radford MS4 Drainage Area & Outfall Map, Version 1 dated October 12, 2018
3. Outfall Information Table

Appendix E

1. City of Radford Illicit Discharge and Detention Elimination Ordinance, Version 1, dated July 11, 2016
2. City of Radford Standard Operating Procedure: IDDE: Outfall Screening, Version 1, dated 06/30/2016
3. City of Radford MS4 Illicit Discharge Program Dry Weather Screening, Version 1, dated 06/30/2016
4. MS4 Outfall Field Screening Report, Version 1, dated 06/30/2016
5. Illicit Discharge Incident Tracking Sheet, Version 1, dated 06/30/2016
6. Illicit Discharge Incident Report 2018-1, Version 1 dated 09/30/2018

Items to be included in the Annual Report:

1. A confirmation statement that the MS4 map and information table have been updated to reflect any changes to the MS4 occurring on or before June 30 of the reporting year.
2. The total number of outfalls screened during the reporting period as part of the dry weather screening program.
3. A list of illicit discharges to the MS4 including spills reaching the MS4 with information as follows:
 - (a) The source of illicit discharge;
 - (b) The dates that the discharge was observed, reported, or both;
 - (c) Whether the discharge was discovered by the permittee during dry weather screening, reported by the public, or other method (describe);
 - (d) How the investigation was resolved;
 - (e) A description of any follow-up activities; and
 - (f) The date the investigation was closed.

5.0 MCM 4: CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

This minimum control measure is intended to reduce pollutants in stormwater runoff from land disturbing activities to the MS4 storm system.

The City of Radford previously established an Erosion and Sediment Control program, which meets the requirements of the MCM.

1. An Erosion and Sediment Control Ordinance to require erosion and sediment controls, as well as sanctions to ensure compliance, under local law for all land disturbances of 10,000 square feet or more.
2. Ordinance requirements for plan approval prior to land disturbance and construction site operators to implement appropriate erosion and sediment control best management practices.
3. Erosion and Sediment Control inspection procedures as required by the MS4 General Permit.

The City of Radford developed MS4 Program Plan for MCM 4 to meet the following criteria:

- (1) Provide a description of the legal authorities utilized to ensure compliance with the minimum control measures in Section II related to construction site stormwater runoff control such as ordinances, permits, orders, specific contract language, and inter-jurisdictional agreements;
- (2) Develop written plan review procedures and all associated documents utilized in plan review;
- (3) Develop written inspection procedures and all associated documents utilized during inspection including the inspection schedule;
- (4) Develop written procedures for compliance and enforcement, including a progressive compliance and enforcement strategy, where appropriate;
- (5) Define the roles and responsibilities of each of the operator's departments, divisions, or subdivisions; and
- (6) Develop a tracking and reporting mechanism for regulated land-disturbing activities to provide the required reporting in all subsequent annual reports.

BMP 4.0 – Erosion and Sediment Control Program

The City adopted and will maintain an ordinance in the City Code that requires compliance with the Virginia Erosion and Sediment Control regulations and a program that provides written procedures, roles and responsibilities, and legal authorities. Refer to the Erosion and Sediment Control (ESC) Ordinance (Code of Ordinances City of Radford Chapter 31, Articles 1 &2), which complies with the Virginia Erosion & Sediment Control regulations, requires evidence of coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities, as applicable, prior to beginning land disturbance, provides for inspection of land disturbing activities by the City and details available enforcement options.

Requirement: The City shall submit required monthly Land Disturbance Reports to DEQ in accordance with the Virginia Erosion and Sediment Control Law (§ 62.1-44.15:59 et seq. of the Code of Virginia) and the Virginia Erosion and Sediment Control Regulations (9VAC25-840-65), when there are active construction projects.

Measurable Goals: Continued enforcement of Ordinance 1681 the Erosion and Sediment Control Ordinance, latest edition.

Responsible Party: City's Engineering Department

Supporting Documents: Appendix F

1. Erosion and Sediment Control Ordinance (Chapter 31) / Description of Legal Authorities, Version 2, 2019
https://library.municode.com/va/radford/codes/code_of_ordinances?nodeId=PTIICOOR_CH31ERSECO
2. Radford VSMP Administrative Guidance Manual (Plan Review Procedures), Version 1, dated 09/19/14
<https://www.radfordva.gov/DocumentCenter/View/3156/Administrative-Guidance-Manual>
3. Radford Erosion and Sediment Control Inspection Process/Procedures, Version 1, dated 09/30/2018
4. City of Radford Erosion and Sediment Plan Inspection Report, Version 1, dated 09/30/2018
5. Radford Erosion & Sediment Control Compliance and Enforcement Procedure, Version 1, dated 09/30/2018

Items to be included in the Annual Report:

1. A confirmation statement that land disturbing projects that occurred during the reporting period have been conducted in accordance with the current department approved standards and specifications for erosion and sediment control.
2. If one or more of the land disturbing projects were not conducted with the department approved standards and specifications, an explanation as to why the projects did not conform to the approved standards and specifications.
3. Total number of inspections conducted.
4. The total number and type of enforcement actions implemented and the type of enforcement actions.

6.0 MCM 5: POST-CONSTRUCTION STORMWATER MANAGEMENT

This minimum control measure is intended to reduce pollutants in stormwater runoff from developed properties to the MS4 storm system. The post-construction stormwater management program includes the following elements:

- (1) A Stormwater Management Ordinance;
- (2) Written policies and procedures utilized to ensure that stormwater management facilities are designed and installed in accordance with Section II B 5 b of the MS4 General Permit;
- (3) Written inspection policies and procedures utilized in conducting inspections;
- (4) 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;
- (5) Written procedures for inspection and maintenance of operator-owned stormwater management facilities;
- (6) Roles and responsibilities for implementing MCM 5; and
- (7) A stormwater management facility tracking and reporting mechanism.

BMP 5.01 – Adopt a Stormwater Ordinance to Control Impacts of Runoff

The City's Stormwater Ordinance addresses both post-construction stormwater management and illicit discharges. The ordinance complies with the Virginia Stormwater Management Program (VSMP) regulations. Attached is the VSMP approval letter provided by the Department.

Schedule and Evaluation: The City implemented the Stormwater Management Ordinance No. 1662 on October 27, 2014 with an update on January 28, 2019

Measurable Goal: Enforcement of the Stormwater Management Ordinance.

Responsible Party: City's Engineering Department and City Administration

Supporting Documents: Appendix G, unless otherwise noted

1. Effective MS4 permit and coverage letter.
2. Stormwater Management Ordinance and Legal Authorities, Version 2, dated January 28, 2019
<https://www.radfordva.gov/DocumentCenter/View/4628/Stormwater-Management-Ordinance-ORD-1662>
3. Administrative Guidance Manual, Version 1, dated 09/19/14 (Appendix F)
<https://www.radfordva.gov/DocumentCenter/View/3156/Administrative-Guidance-Manual>
4. Long-Term Stormwater Management Facility Maintenance Agreement, Version 1, dated 09/30/2018
5. Radford Inspecting Stormwater Management Facilities SOP, Version 1, dated 09/30/2018

Items to be included in the Annual Report: Revisions to the stormwater ordinance, if any.

BMP 5-02: Stormwater Management Tracking and Reporting System

The City developed and maintains a database of all known operator-owned and privately-owned stormwater management facilities that discharge into the MS4 storm system for tracking and reporting. Database attributes for each stormwater management facility shall include the following:

1. Facility type and BMP Clearinghouse specification reference number;
2. Location (address or latitude and longitude);
3. Total area treated, including delineation of pervious and impervious area;
4. Completion date; if unknown, assume June 30, 2005;
5. The sixth order hydrologic unit code (HUC) where the facility is located;
6. Name of any impaired water segments within each HUC listed in the 2010 §305(b)/303(d) Water Quality Assessment Integrated Report to which the facility discharges;
7. Ownership information (private or public); and
8. Date of most recent inspection and name of inspector.

Schedule / Measurable Goal: The stormwater management facility database is updated no later than 30 days after any new SMF is brought online or a previously existing SMF is discovered in accordance with Part I E 5.e of the MS4 General Permit.

Responsible Party: City Engineering Department

Supporting Documents: Appendix H

1. City of Radford BMP Inspection Form Version 2, dated 2021
1. MS4 SMF Tracking Database. Version 1, dated 2017

Items to be included in the Annual Report:

1. The number of privately-owned stormwater management facility inspections conducted.
2. The number of enforcement actions initiated by the permittee to ensure long-term maintenance of privately-owned stormwater management facilities including the type of enforcement action.
3. The total number of inspections conducted on stormwater management facilities owned or operated by the permittee.
4. A description of the significant maintenance, repair, or retrofit activities performed on the stormwater management facilities owned or operated by the permittee to ensure it continues to perform as designed.
5. A confirmation statement that the permittee submitted stormwater management facility information through the Virginia Construction Stormwater General Permit database for those land disturbing activities for which the permittee was required to obtain coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities in accordance with Part I E 5 f or a statement that the permittee did not complete any projects requiring coverage under the General VPDES Permit for Discharges of Stormwater from Construction Activities.
6. A confirmation statement that the permittee electronically reported BMPs using the DEQ BMP Warehouse in accordance with Part I E 5 g and the date on which the information was submitted.

7.0 MCM 6: POLLUTION PREVENTION/GOOD HOUSEKEEPING

This minimum control measure is intended to reduce pollutants in stormwater from daily operations and maintenance activities and municipal facilities, and from turf and landscape areas. The pollution prevention/good housekeeping plan will include the following elements:

- (1) Written protocols being used to comply with the MS4 General Permit the daily operations and maintenance requirements;
- (2) A list of all municipal high-priority facilities that identifies those facilities that have a high potential for chemicals or other materials to be discharged in stormwater and a schedule that identifies the year in which an individual stormwater pollution prevention plan (SWPPP) will be developed for those facilities required to have a SWPPP;
- (3) A list of lands where nutrients are applied to a contiguous area of more than one acre;
- (4) A turf and landscape nutrient management plan (Appendix I); and
- (5) A written training plan for the next reporting cycle.

BMP 6.01 – Standard Operating Procedures and Employee Training

The City developed standard operating procedures (SOPs) and implemented an employee-training program designed to raise awareness within city employees of stormwater management practices as it relates to specific tasks and assignments. No deicing agents containing urea will be applied in accordance with Part I E.6.k of the MS4 General Permit.

Schedule and Evaluation: The City developed SOP's for employees as a guide for pollution prevention/good housekeeping. The City continually review and revise the SOPs, as needed.

Employee Training

Once per 24 months: Illicit discharge detection, good housekeeping, and pollution prevention training for City staff responsible for illicit discharge recognition and reporting; road, street, and parking lot maintenance, and maintenance at public works or recreational facilities

Within 3 months of hire: Illicit discharge detection, good housekeeping, and pollution prevention training for **new** City staff responsible for illicit discharge recognition and reporting; road, street, and parking lot maintenance, and maintenance at public works or recreational facilities

Measurable Goals: Each employee will participate in at least one training session per year; new employees will have training within three months of start date; new employees at a site with a SWPPP will have training within one month of start date.

Responsible Party: Engineering Department and City Administration

Supporting Documents: Appendix J – Standard Operating Procedures, Version 1, 2018

1. Asphalt Program (Version 2, 04/15/2022)
2. Building Maintenance
3. Detention Pond Maintenance
4. Drainageway Maintenance

5. Vehicle and Equipment Storage
6. Good Housekeeping
7. IDDE: Outfall Screening
8. Inlet, Pipe & Vault Cleaning and Disposal
9. Landscape Chemical Application
10. Disposal and Maintenance of Landscaping/Organic Waste
11. Parking Lot Sweeping and Repair
12. Recycling and Drop Center
13. Right-Of-Way (ROW) Maintenance
14. Salt and Spreader Shed Maintenance (Version 2, 04/15/2022)
15. Spill Prevention and Control
16. Street Sweeping for Water Quality Protection
17. Vehicle Maintenance
18. Vehicle Washing
19. Utility and Construction Maintenance
20. Bulk Storage (Version 1, 04/15/2022)

Items to be included in the Annual Report:

1. Date of, number of employees attending, and objective of the training event.
2. A summary of any operational procedures developed or modified in accordance with Part I E 6 a during the reporting period.

BMP 6.02 – Municipal SWPPPS

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, 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: 100% of the municipal SWPPPs are complete. 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.

Measurable Goals: Implementation of the SWPPPs and SOPs.

Responsible Party: Engineering Department

Supporting Documents:

1. Public Works Department Facility, Version 2, May 2022
2. Electric Department, Version 1, September 2018
3. Solid Waste and Recycling Drop Center (Old Park Road Incinerator Site), Version 2, January 2022
4. Ingle’s Mountain Equipment Storage Area, Version 1, September 2018

Items to be included in the Annual Report: Listing of the additional SWPPPs needed or modified, as

may be identified during the reporting period.

BMP 6.03 – Nutrient Management Plan

The City 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. The following is a list of sites to have a nutrient management plan.

- | | |
|-------------------------------|------------|
| 1. Belle Heth Field | 1.0 acres |
| 2. Bisset Park | 9.0 acres |
| 3. Dobbins Park | 1.0 acres |
| 4. Dog Park | 0.9 acres |
| 5. Havens Heights | 0.9 acres |
| 6. High School Practice | 3.6 acres |
| 7. Mcharg Field | 2.7 acres |
| 8. Medians | 10.7 acres |
| 9. New River Valley Complex | 3.6 acres |
| 10. Radford Memorial field | 2.5 acres |
| 11. Riverview Park | 1.5 acres |
| 12. Sunset Park | 1.2 acres |
| 13. Triangle Park Main Street | 0.1 acres |
| 14. Veterans Park | 3.3 acres |
| 15. Wildwood Park | 0.5 acres |

Schedule and Evaluation: The City will update by June 30 of every permit cycle the list of lands requiring a nutrient management plan.

Measurable Goals: Implementation of the nutrient management plan.

Responsible Party: Engineering Department

Supporting Documents: Appendix I – Nutrient Management Plan

Items to be included in the Annual Report: A summary of any new turf and landscape nutrient management plans developed that includes the location and the total acreage of each land area, and the date of the approved nutrient management plan.

BMP 6.03 – Certifications

The City staff and/or consultants that are involved in implementing the Erosion and Sediment Control and Stormwater Management Ordinances, and responsible for application of pesticides will maintain the appropriate Virginia certifications.

Additionally, employees and contractors who apply pesticides and herbicide must be 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

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

Measurable Goals: All appropriate staff will maintain required certifications

Responsible Party: Engineering Department

Supporting Documents: Copies of certification documentation as requested.