



Department of Public Works

Stormwater Management Program

941 Fir Street
Waynesboro, Virginia 22980
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January 14, 2016

Department of Environmental Quality
Megan O’Gorek
DEQ Valley Regional Office
4411 Early Road
Harrisonburg, VA 22801

RE: Additional Information Requested for Permit Year 2 Annual Report for General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems, Permit # VAR04133

Mrs. O’Gorek,

The City provides the following comments to the additional information requested for the Annual Report for the Waynesboro MS-4 Program, operating under Permit VAR04133. Responses are provided in *italics*.

Permit Condition Section II. B.1.g(1) and (2)- MCM 1- Need to include estimated percentage of the target audience(s) that will be reached. For example, 75 students reached during Year 2 but out of how many students? (estimated total # of students in Waynesboro City schools)? The estimated total and estimated percentage needs to be listed for Year 2 Activities and Year 3 Goals for each BMP listed (school presentations, stormwater brochures and educational brochures).

- ***BMP – 1.1 School Presentations-*** *The long-term goal for this program is to reach students who are retained in City schools by providing educational opportunities in specific grades that have compatible curriculum. The program will not target the overall student population annually, but primarily students in 4th grade and 6th grade.*

In Permit Year 2, the program staff conducted presentations for the 4th grade at one of the four elementary schools in the City. The host school, Berkeley Glen, has approximately 20 percent of the 4th graders enrolled in City schools. In Permit Year 3, City staff will give the presentations at three of the four City elementary schools. The 6th grade stream walk reaches approximately 90 percent of the students at the only middle school in the City system. There are no plans at this time to expand school presentations to Waynesboro High School besides the presentations to Ecology students.

- **BMP – 1.2 Stormwater Webpage**- The [dedicated stormwater page](#) on the City's website allows detailed information to be available to the public including the MS4 Program Plan and Annual Report. The target audience for this information is City residents and business owners who may impact stormwater pollution. The City issued approximately 8,500 bills to property owners for a Stormwater Utility Fee in November 2015. Prior to this, the City provided information including the website address to these same property owners. In Permit Year 3, the City will include the website address on the stormwater utility bill for all property owners in the City. It is estimated by [Virginia Performs](#) that 75% of Virginia residents have internet access, so the actual target audience is 6,400.
- **BMP – 1.3 Educational Brochures**- The City is working to develop base knowledge of stormwater runoff and pollution during the first five year permit cycle. The City will attempt to distribute 1,700 brochures in Year 3 which equates to 20 percent of property owners in the City.

Permit Condition Section II.B.2.d(1)- MCM 2- Provide a web link to the MS4 Program Plan and annual report.

The hyperlink did not transfer to the report provided to DEQ. The City [MS4 Program Plan](#) and [Annual Report](#) can be found on the City's website.

Permit Condition Section II.B.4.f(1) –MCM 4– Provide total number of regulated land-disturbing activities.

*This information was provided incorrectly in the September 30, 2015 Annual Report. The City issued permits for **40** single family residences and **6** non-single family projects for land disturbance under ESC regulations. 27 of the single family residences and all of the non-single family projects also fell under VSMP regulations. Additionally, 36 single family residences and 3 non-single family projects overlapped Permit Years 1 and 2. I have updated the table included in the September 30 report with these figures below.*

BMP	Tracking Measure	Reported Number				
		2013	2014	2015	2016	2017
4.1 Erosion and Sediment Control Program	# of new sf land disturbance activities	76	40			
	# of new non-sf land disturbance activities	13	6			
	# of acres	65.66	68.29			
	# of inspections	1,501	1,254			
	# of enforcement actions	43	21			
4.2 Require VSMP Permits	# of permits		9			
	# of single family permits (CPOD)	7	27			
	# of full inspections		2			
	# of 'spot' inspections		130			
	# of CPOD inspections		54			
	# of enforcement actions		0			
	# of exemptions	0	0			

Permit Condition Section II.B.4.f(4)- MCM 4-Provide more detail on enforcement actions taken.

The City described the number and type of enforcement actions in the September 30, 2015 Annual Report. The Report stated: "From July 1, 2014 to June 30, 2015 City of Waynesboro ESC Staff issued 8 Notice to Comply documents, 10 Stop Work Orders, and 3 Letters of Enforcement."

The Report did not explicitly state that all issues leading to enforcement were resolved, but no outstanding issues remained following the corrective action period provided in the enforcement documents.

Permit Condition Section II.B.5.e- MCM 5- Is there currently a spreadsheet listing all stormwater management facilities to date?

Yes, the City participated in the Historical Data Cleanup Grant Program sponsored by DEQ that ended in September 2015. The City updated the spreadsheet listing stormwater management facilities that was in existence prior to June 30, 2015. The data provided to DEQ is the most recent and will be included via email attachment to this response. The City also updated their BMP information to include facilities installed in Permit Years 1 and 2. That information is included below.

The City Stormwater Program is still operating under the MS4 Program Plan that was approved in March 2013. No changes to the Program Plan have been made.

If you have any questions or comments, please contact me at 540-942-6624.

Thank you,
Trafford McRae
Stormwater Program Manager



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