Stormwater Management Plan

National Pollutant Discharge Elimination System
West Virginia Municipal Separate Storm Sewer Systems
General Permit WV0116025
Registration: WVR030033

Huntington Stormwater Utility
P.O. Box 7578
Huntington, WV 25777

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This Plan will be posted at the Huntington Water Quality Board's website: huntingtonwqb.com

Comments may be sent via email to Sherry.Wilkins@huntingtonswu.com and David.Dennis@huntingtonswu.com

EXECUTIVE SUMMARY

The Huntington Stormwater Utility (HSU) has developed this Stormwater Management Plan (SWMP) to satisfy the requirements of the West Virginia National Pollutant Discharge Elimination System (NPDES) General Permit for Small Municipal Separate Storm Sewer Systems (MS4s), Permit No. WV0116025 (hereinafter referred to as Permit). This SWMP establishes the policies, procedures, and Best Management Practices (BMPs) that HSU will implement to reduce the discharge of pollutants to the Maximum Extent Practicable (MEP), protect water quality, and comply with applicable federal and state stormwater regulations.

The City of Huntington presents unique stormwater management challenges due to the coexistence of a regulated Municipal Separate Storm Sewer System (MS4) and an extensive combined sewer system. Approximately ninety percent (90%) of stormwater drainage within the city is conveyed to the combined sewer system operated by the Huntington Sanitary Board, while approximately ten percent (10%) is discharged through the regulated MS4 directly to local streams. As a result, this SWMP focuses on those portions of the municipal drainage system that are regulated under the MS4 permit while recognizing that many municipal operations and facilities discharge to the combined sewer system rather than the MS4.

The MS4 discharges to several receiving waters, including Fourpole Creek, the Guyandotte River, the Ohio River, Pats Branch, Krout Creek, and other tributaries. Several of these waters are listed as impaired under Section 303(d) of the Clean Water Act or are subject to approved Total Maximum Daily Loads (TMDLs) for pollutants including fecal coliform bacteria, iron, biological impairment, polychlorinated biphenyls (PCBs), and dioxins. The implementation of this SWMP is intended to reduce pollutant loading to these receiving waters and support compliance with applicable TMDLs and water quality standards.

This SWMP is organized around the six Minimum Control Measures (MCMs) required by the MS4 General Permit:

- Public Education and Outreach
- Public Involvement and Participation
- Illicit Discharge Detection and Elimination
- Construction Site Runoff Control
- Post-Construction Stormwater Management
- Pollution Prevention and Good Housekeeping for Municipal Operations

For each MCM, this SWMP identifies program objectives, legal authority, implementation procedures, measurable goals, responsible parties, and methods for evaluating program effectiveness.

In addition to meeting the minimum permit requirements, Huntington has implemented several program enhancements intended to provide greater protection of local water resources. These include local erosion and sediment control requirements for land-disturbing activities of 10,000 square feet or greater, post-construction stormwater management requirements for development creating 5,000 square feet or more of impervious surface, digital MS4 mapping and asset management, comprehensive illicit discharge response procedures, public reporting mechanisms, long-term maintenance requirements for stormwater management facilities, and an emphasis on runoff reduction through green infrastructure and low impact development practices.

The Huntington Stormwater Utility will evaluate the effectiveness of this SWMP on an ongoing basis through measurable goals, annual program reviews, inspections, maintenance activities, enforcement actions,

and public participation. The SWMP will be updated as necessary to reflect changes in permit requirements, municipal operations, development practices, and program performance. See Appendix C of this document for definitions of terms used throughout this SWMP.

Through implementation of this Stormwater Management Plan, Huntington is committed to protecting and improving the quality of its streams, rivers, and stormwater infrastructure while maintaining compliance with the Clean Water Act, the West Virginia MS4 General Permit, and all applicable state and local regulations.

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SECTION 1. INTRODUCTION AND PERMIT COVERAGE

The City of Huntington has one of the most unique municipal stormwater systems in West Virginia due to the presence of a regulated MS4, an extensive combined sewer system, and a floodwall system. This dual drainage network significantly influences how stormwater is collected, conveyed, and managed throughout the city and has shaped the development of this SWMP.

Much of Huntington's urban core was developed in the late nineteenth and early twentieth centuries, before separate stormwater collection systems became the standard for municipal infrastructure. As a result, large portions of the city were constructed with combined sewers that convey both sanitary wastewater and stormwater to the Huntington Sanitary Board's wastewater treatment facilities. Today, approximately ninety percent (90%) of the city's drainage area is served by the combined sewer system, while approximately ten percent (10%) drains through a separate MS4 that discharges directly to local streams and the Ohio River.

The City's stormwater system is also closely integrated with Huntington's flood protection system. Following devastating Ohio River floods during the first half of the twentieth century, a comprehensive floodwall, levee, pump station, and floodgate system was constructed to protect the community from river flooding. During periods of high river stages, stormwater collected within protected areas is conveyed to pump stations where it is pumped over the floodwall and discharged to the Ohio River. HSU owns, operates, and maintains this flood protection infrastructure as part of its overall stormwater management responsibilities.

Because the regulated MS4 serves only a portion of the city's drainage area, many municipal facilities that would typically be considered high-priority municipal operations under an MS4 program—including vehicle maintenance facilities, wastewater treatment operations, salt storage areas, and certain public works facilities—are located within the combined sewer service area and do not discharge stormwater to the regulated MS4. Consequently, these facilities generally do not contribute stormwater discharges subject to the requirements of the Permit, although they remain subject to other applicable federal, state, and local environmental regulations.

This distinction also affects the implementation of Huntington's SWMP. While the MS4 permit regulates only discharges from the separate storm sewer system, HSU administers many stormwater management activities citywide. Local erosion and sediment control requirements, post-construction stormwater management standards, public education efforts, illicit discharge response, and development review are implemented throughout the city regardless of whether runoff ultimately enters the MS4 or the combined sewer system. This comprehensive approach helps reduce pollutant loading, minimizes localized flooding, decreases sediment entering both drainage systems, and supports the long-term operation of the City's wastewater and flood protection infrastructure.

Recognizing the unique characteristics of Huntington's drainage system is essential for understanding the implementation of this SWMP. The BMPs, measurable goals, and program priorities described throughout this document have been developed specifically to address the City's combination of separate storm sewers, combined sewers, and flood protection infrastructure while ensuring compliance with the requirements of the Permit.

SECTION 2. ROLES AND RESPONSIBILITIES

The implementation of the requirements of the Permit and this SWMP will be conducted by representatives of the HSU. The contact information for HSU's representatives is as follows:

Name: Sherry Wilkins (Director)
Phone number: 304-781-1952
Email address: sherry.wilkins@huntingtonswu.com

Name: David Dennis (Stormwater Program Analyst)
Phone number: 304-781-1948
Email address: david.dennis@huntingtonswu.com

The Huntington Sanitary Board provides assistance in our implementation of our Minimum Control Measures. The contact information for the HSB's representative is as follows:

Name: Wes Leek (Director)
Phone number: 304-781-1912
Email address: wleek@huntingtonsb.com

The City of Huntington Public Works Department may collaborate with HSU on some projects in order to implement the Minimum Control Measures. The contact information for the Public Works representative is as follows:

Name: Mark Bates (Director)
Phone number: 304-696-4414
Email address: batesm@huntingtonwv.gov

SECTION 3. RECEIVING STREAMS AND IMPAIRED WATERBODIES/TMDL

Stream	Waterbody Extent Description	2022 Category 5 - 303 (d) List - Needs TMDL	2022 Category 4A Waters with Approved TMDL
Ohio River	Gallipolis L&D at MP 279.2 to mouth of Big Sandy at MP 317.2	Iron, Fecal Coliform	Dioxin, PCBs in fish tissue
Guyandotte River (lower)	Mouth to RM 7.2	None (See Approved TMDL)	Fecal Coliform, Iron
Fourpole Creek	Entire Length	CNA-Biology	Fecal Coliform
Hisey Fork	Entire Length	N/A	N/A
Medley Fork	Entire Length	N/A	N/A
Grapevine Branch	Entire Length	N/A	N/A
Russell Creek	Entire Length	None (See Approved TMDL)	CNA Biology, Iron, Fecal Coliform
UNT/ Russell Creek	Entire Length	CNA Biology	Iron, Fecal Coliform
Pats Branch	RM 0.2 to HW	None (See Approved TMDL)	Fecal Coliform
Krout Creek	Entire Length	CNA-Biological	Iron, Fecal Coliform
Twelvepole Creek	Mouth to RM 8.6	None (See Approved TMDL)	Iron, Fecal Coliform

Table 1 – List of receiving streams in the City of Huntington's MS4 Service Area. Parameters of impairment and completed TMDLs are shown.

In accordance with the Permit conditions, no scheduled sampling of outfalls will occur. If monitoring is conducted, samples will be collected and analyzed in accordance with all applicable rules and regulations. As mentioned previously, approximately 90% of the stormwater drainage in the city connects to combined sewers, leaving approximately 10% of drainage to enter the MS4 drainage system directly to a stream. There are no *municipal* industrial facilities that discharge into the MS4 system. In accordance with Permit requirements, a representative outfall must still be chosen, and therefore an outfall was selected on Fourpole Creek near 4th Street and North Blvd. This is located in a dense residential neighborhood adjacent to a major roadway. The outlet is located at longitude: -82.448874 and latitude: 38.406719.

SECTION 4. LEGAL AUTHORITY

The City of Huntington and the Huntington Stormwater Utility possess the legal authority necessary to implement, administer, and enforce all requirements of the Permit.

This authority is derived from the City's Codified Ordinances, applicable provisions of West Virginia law, adopted policies and procedures, development regulations, permit conditions, maintenance agreements, and other legally enforceable mechanisms.

HSU is authorized to administer the City's SWMP, review development proposals, conduct inspections, investigate potential violations, implement enforcement actions, require corrective measures, and perform other activities necessary to achieve compliance with the MS4 General Permit and protect water quality.

The City's legal authorities include, but are not limited to, the authority to:

- Prohibit illicit discharges and illicit connections to the MS4, except those specifically authorized by applicable permits or regulations.
- Investigate suspected illicit discharges through inspections, monitoring, sampling, dye testing, smoke testing, closed-circuit television (CCTV) inspections, records review, and other appropriate investigative techniques.
- Enter property, at reasonable times and in accordance with applicable law, to inspect stormwater facilities, investigate suspected violations, verify compliance, perform monitoring, or carry out enforcement activities.
- Review, approve, condition, or deny erosion and sediment control plans, Stormwater Pollution Prevention Plans (SWPPPs), and Post-Construction Stormwater Management Plans (PCSMPs).
- Require the installation, operation, maintenance, repair, replacement, inspection, and long-term preservation of permanent stormwater management practices as conditions of development approval.
- Require execution and recording of maintenance agreements and grant the city access for inspection and maintenance of privately owned stormwater management facilities when necessary.
- Require corrective actions to eliminate illicit discharges, repair deficient stormwater facilities, stabilize disturbed areas, restore damaged BMPs, or otherwise achieve compliance with applicable regulations.
- Issue notices of violation, stop-work orders, corrective action orders, administrative directives, civil penalties, cost recovery actions, and pursue other legal remedies authorized by ordinance or state law.
- Recover costs incurred by the City for emergency response, abatement of violations, restoration of public infrastructure, or corrective work performed by the City when responsible parties fail to comply.
- Adopt policies, technical standards, specifications, and administrative procedures necessary to implement this SWMP and applicable stormwater management requirements.

Implementation of this SWMP is supported by the following provisions of the Codified Ordinances of the City of Huntington, as amended:

- **Article 935 – Stormwater System of the City of Huntington** - establishes the Huntington Stormwater Utility under the Huntington Water Quality Board and gives it broad authority to manage the City's stormwater system. Its purpose is to protect public health, safety, and welfare and to protect watercourses and water supplies from pollution, excessive runoff, flooding-related impacts, and other conditions that degrade the water environment. The Article authorizes the Utility to plan, acquire, construct, inspect, operate, maintain, improve, regulate, replace, and finance stormwater infrastructure throughout its service area, including acquiring property or easements when necessary. It also establishes the Utility's authority to assess and collect stormwater/water-quality service fees and charges to fund the operation, maintenance, improvement, and administration of the stormwater system.

- **Article 969 – Illicit Discharge and Detection** - establishes prohibitions, investigation procedures, enforcement authority, and corrective action requirements for illicit discharges and illicit connections.

- **Article 970 – Erosion and Sediment Control** – establishes requirements for erosion and sediment control permits, construction-site BMPs, inspections, enforcement, and stabilization of disturbed areas.

- **Article 971 – Control of Post-Construction Stormwater Runoff -** establishes post-construction stormwater management requirements, stormwater management plan review, design standards, long-term maintenance requirements, inspection authority, and enforcement provisions for new development and redevelopment.

Where necessary, HSU coordinates implementation and enforcement activities with other City departments, the Huntington Sanitary Board, the West Virginia Department of Environmental Protection (WVDEP), the West Virginia Department of Transportation, Cabell County agencies, and other federal, state, and local entities having jurisdiction. Such coordination helps ensure consistent implementation of stormwater regulations, effective enforcement, and protection of water quality throughout the City.

The legal authorities described in this section provide the regulatory framework necessary to implement each of the six Minimum Control Measures, satisfy the requirements of the Permit, and reduce the discharge of pollutants to the MEP while protecting the water resources of the City of Huntington.

SECTION 5. PUBLIC EDUCATION AND OUTREACH– MCM #1

Objective

The objective of this Minimum Control Measure (MCM) is to increase public awareness of stormwater pollution, promote changes that protect water quality, and educate residents, businesses, developers, and other stakeholders regarding the impacts of stormwater runoff and improper disposal of pollutants.

High-Priority Stormwater Issues

The City has identified the following high-priority stormwater issues based on local water quality concerns, Total Maximum Daily Loads (TMDLs), and the potential impacts to receiving streams and stormwater infrastructure.

1. *Stormwater Management and Runoff Reduction*

Stormwater management has been identified as a high-priority stormwater issue because the City of Huntington contains both a regulated MS4 and a substantial combined sewer system. Effective stormwater management is essential not only to protect the quality of stormwater discharged from the MS4, but also to reduce the volume and rate of runoff entering the combined sewer system, where excessive stormwater can contribute to combined sewer overflows (CSOs), localized flooding, and increased demands on wastewater infrastructure. Public education and outreach will emphasize the importance of reducing impervious surface impacts, encouraging infiltration, and implementing practices that retain, reuse, or slow stormwater runoff before it reaches either storm or combined sewer systems. Target audiences will include residential property owners, commercial and industrial property owners, developers, design professionals, contractors, institutions, and community organizations involved in land development and property maintenance. Educational strategies will include utility bill inserts, the City's website and social media platforms, public workshops, informational brochures, demonstration projects, school education programs, and participation in community events. Outreach will promote practices such as rain gardens, rain barrels, native landscaping, tree planting, permeable pavement, and proper maintenance of stormwater management facilities. By increasing public understanding of how individual properties contribute to runoff, these efforts are intended to reduce pollutant loads, lessen peak stormwater flows, improve the performance of both the MS4 and combined sewer system, decrease the likelihood of localized flooding and CSOs, and protect the water quality of Huntington's receiving streams.

2. *Sediment and Erosion Control*

Sediment control has been identified as a high-priority stormwater issue because sediment is one of the most common pollutants discharged from construction sites, disturbed land, and improperly managed properties within the City of Huntington. Excess sediment transported by stormwater can clog storm drain infrastructure, reduce the capacity of drainage systems, increase maintenance costs, contribute to localized flooding, and degrade the water quality and habitat of local streams. Sediment also serves as a carrier for nutrients, metals, hydrocarbons, and other pollutants that attach to soil particles, further impacting receiving waters. Public education and outreach will emphasize the importance of preventing erosion, stabilizing disturbed soils, and implementing effective erosion and sediment control practices before, during, and after land-disturbing activities. Target audiences will include developers, contractors, engineers, landscapers, utility contractors, commercial property owners, municipal employees, and residents undertaking home improvement or landscaping projects. Educational strategies will include the City's website and social media

platforms, informational brochures, pre-construction meetings, contractor outreach, utility bill inserts, school education programs, public workshops, and participation in community events. Outreach will promote practices such as minimizing disturbed areas, protecting storm drain inlets, installing and maintaining erosion and sediment control measures, promptly stabilizing exposed soils, and complying with applicable local and state construction stormwater requirements. These educational efforts are intended to reduce sediment entering the City's MS4 and combined sewer system, improve the effectiveness of drainage infrastructure, reduce maintenance needs, protect aquatic habitat, and improve the overall quality of Huntington's receiving waters.

3. *Illicit Discharges*

Illicit discharges have been identified as a high-priority stormwater issue because they are among the most preventable yet potentially significant sources of pollution entering the City of Huntington's MS4. Unlike sanitary sewers, the MS4 conveys stormwater directly to local streams with little or no treatment. Any discharge other than stormwater—including automotive fluids, paint, wash water, household chemicals, sanitary wastewater, sediment-laden runoff, and improper commercial or industrial discharges—can quickly degrade water quality, threaten aquatic life, and impair recreational use of receiving waters. Public education and outreach will focus on increasing awareness that storm drains discharge directly to local waterways and that illicit discharges are prohibited under City ordinance and subject to enforcement actions. Target audiences will include residents, businesses, commercial property owners, contractors, municipal employees, and institutions whose activities have the greatest potential to generate illicit discharges. Educational strategies will include printed educational materials, utility bill messages, the City's website and social media platforms, public presentations, storm drain marking initiatives, school education programs, and participation in community events. These outreach efforts are intended to encourage proper waste disposal, improve reporting of suspected illicit discharges, promote compliance with local regulations, and reduce the frequency and volume of pollutants entering the City's storm sewer system, thereby protecting local waterways and improving overall water quality.

Measurable Goals

HSU will document implementation of this MCM through the following measurable goals:

- Distribute stormwater educational information through utility bill messages to approximately 26,500 customers monthly
- Participate in a minimum of two public education or outreach events annually
- Track the number of attendees and participants at outreach events
- Maintain records of educational materials distributed
- Document all public education activities and measurable results in the Annual MS4 Report

Any modifications to public education activities or BMP implementation occurring during the reporting period will be documented in the corresponding Annual Report.

SECTION 6. PUBLIC INVOLVEMENT AND PARTICIPATION – MCM #2

Objective

The objective of this Minimum Control Measure (MCM) is to provide opportunities for public involvement in the development, implementation, and review of this SWMP, increase public awareness of stormwater issues, and encourage community participation in activities that improve water quality. HSU will also provide mechanisms for the public to report potential stormwater concerns, including illicit discharges and improper disposal of pollutants.

Public Availability of Program Information

HSU maintains a dedicated MS4 webpage (https://huntingtonwqb.com/) that provides public access to key stormwater program documents. At a minimum, the following documents will be available:

- WVDEP General Permit for Small Municipal Separate Storm Sewer Systems (MS4s)
- HSU's Permit Registration and Coverage Letter
- Current Stormwater Management Program (SWMP)
- Most Recent Annual MS4 Report
- Contact information for stormwater program staff
- Information regarding stormwater pollution prevention and reporting procedures

Program documents will be updated as revisions occur to ensure current information remains available to the public.

Reporting Mechanism

HSU maintains a publicly accessible reporting mechanism through a telephone number, online reporting form, and an email address.

The reporting system will allow citizens to report:

- Illicit discharges and illegal dumping
- Spills and unauthorized releases
- Improper disposal of pollutants
- Construction-site runoff concerns
- Stormwater infrastructure issues
- Potential violations of stormwater ordinances
- Comments and recommendations regarding the SWMP and Annual Report

Reports received will be reviewed and addressed in accordance with applicable City procedures and permit requirements.

Public Involvement Activities

HSU implements the following public involvement and participation activities annually.

1. Stormwater Educational Events

HSU conducts or participates in at least one public stormwater education event annually.

Examples may include:

- Rain barrel workshops
- Rain garden demonstrations
- Storm drain art programs
- Community cleanup events
- Earth Day celebrations
- Watershed awareness events

These activities encourage residents to implement stormwater management practices and increase awareness of the impacts of stormwater runoff on local waterways.

2. School and Youth Education Programs

HSU conducts at least one stormwater presentation annually for school-age students.

Presentations may occur through:

- Local schools
- Summer camps
- Youth organizations
- Environmental education programs

Educational topics may include:

- Watersheds and stormwater runoff
- Pollution prevention
- Stream protection
- Litter reduction
- Water conservation

These activities help foster environmental stewardship and encourage students to share stormwater pollution prevention practices with their families and communities.

3. Storm Drain Marking Program

HSU continues implementation of its storm drain marking program throughout the permit term.

Storm drain markers will communicate that storm drains discharge directly to local waterways. This will remind residents that the storm drains shall only receive stormwater (see MCM #3 for allowable non-stormwater discharges).

The program helps increase public awareness of stormwater pollution prevention and discourages improper disposal of waste, chemicals, and other pollutants into the MS4.

Additional Public Participation Opportunities

HSU may conduct additional public involvement activities throughout the year as opportunities arise, including volunteer cleanup events, watershed projects, public meetings, educational campaigns, and partnerships with community organizations.

SWMP Public Comment Process

Any significant revisions to the SWMP will be made available for public review and comment for a minimum of sixty (60) days.

Notice of the public comment period will be provided through HSU's website and other appropriate communication channels.

HSU will:

- Review all written comments received during the public comment period
- Consider comments on the development or revision of the SWMP
- Prepare written responses to substantive comments received
- Maintain records of comments and responses as part of the MS4 program documentation

Measurable Goals

HSU will evaluate implementation of this MCM through the following measurable goals:

- Maintain a publicly accessible MS4 webpage throughout the permit term
- Maintain at least one public reporting mechanism for stormwater concerns
- Conduct or participate in a minimum of one public stormwater education event annually
- Conduct a minimum of one school or youth stormwater presentation annually
- Continue implementation of the storm drain marking program annually
- Track and document the number of public reports received and investigated
- Track participation levels for public events and educational activities
- Document all public involvement activities and measurable results in the Annual MS4 Report

Any modifications to public participation activities or BMP implementation occurring during the reporting period will be documented in the corresponding Annual Report.

SECTION 7. ILLICIT DISCHARGE DETECTION AND ELIMINATION – MCM #3

Objective

The objective of this Minimum Control Measure (MCM) is to implement and maintain an Illicit Discharge Detection and Elimination (IDDE) Program designed to identify, investigate, trace, and eliminate illicit discharges to the Municipal Separate Storm Sewer System (MS4) and to maintain an accurate inventory of the regulated stormwater system.

MS4 Mapping

HSU maintains its MS4 mapping system in digital format through the Cityworks asset management platform.

The map includes, to the extent known:

- Stormwater outfalls
- Receiving waters
- Storm sewer pipes
- Manholes and junction structures
- Stormwater facilities
- Major conveyance features
- Known interconnections with surrounding MS4s – Marshall University and WV Department of Transportation
- MS4 service area boundaries

Stormwater-only drainage systems are depicted on the map and are used to establish the regulated MS4 service area. The majority of the city's drainage system ultimately discharges to combined sewer infrastructure and is therefore not regulated under the MS4 permit. However, HSU applies stormwater management and erosion control requirements throughout its jurisdiction.

HSU will update the MS4 map as new infrastructure is constructed, discovered, modified, or removed.

Legal Authority

HSU shall continue implementation of an IDDE Program that prohibits illicit discharges into the MS4 except for allowable non-stormwater discharges authorized by the MS4 General Permit.

HSU enforces Article 969 of the Codified Ordinances for the City of Huntington - Illicit Discharge and Detection.

Article 969 provides HSU with legal authority to:

- Prohibit illicit discharges and illicit connections
- Conduct inspections and investigations
- Require corrective actions
- Enter property as authorized by law

- Issue notices of violation
- Assess civil penalties
- Recover costs associated with enforcement actions
- Pursue legal remedies when necessary

Allowable Non-Stormwater Discharges

The following categories of non-stormwater discharges may be allowed provided they are not significant contributors of pollutants:

- Uncontaminated water line flushing
- Landscape irrigation and lawn watering, provided all pesticides, herbicides, and fertilizers have been applied in accordance with the approved labeling
- Diverted stream flows
- Rising groundwater
- Uncontaminated groundwater infiltration, as defined at 40 CFR § 35.2005(20)
- Uncontaminated pumped groundwater
- Discharges from potable water sources managed in a manner to avoid instream impact
- Foundation or footer drains where flows are not contaminated with process materials
- Air conditioning condensation
- Springs
- Water from crawl space pumps
- Individual residential vehicle washing, or discharges from fundraising car washes if the washing uses only biodegradable, phosphate-free, water-based cleaner
- Flows from riparian habitats and wetlands
- Dechlorinated freshwater swimming pool discharges managed in a manner to avoid instream impact
- Street and pavement wash waters that do not contain cleaning additives or are otherwise managed in a manner to avoid instream impact
- Routine external building washdown provided no soaps, solvents, or detergents are used, external building surfaces do not contain hazardous substances, and the wash water is filtered, settled, or similarly treated prior to discharge
- Discharges or flows from emergency/unplanned firefighting activities including the immediate discharge of materials determined by fire department personnel or emergency management officials to be necessary to protect life or property, provided HSU takes or ensures that the responsible party takes all reasonable steps to minimize or prevent any adverse effect on human health or the environment. This authorization does not transfer liability for a spill from the party responsible for the spill to the MS4 operator or relieve the party responsible for a spill from any reporting requirements imposed by Federal, State, or Local law
- Discharges from flows of water for fire prevention or firefighting training activities managed in a manner to avoid instream impact
- Discharges authorized by a separate National Pollutant Discharge Elimination System (NPDES) permit

HSU may investigate any discharge if it is determined to be a significant contributor of pollutants.

Dry Weather Screening

HSU conducts dry weather screening activities to identify potential illicit discharges. At a minimum, fifty (50) outfalls will be screened annually. No areas within the city have been designated as high-priority illicit discharge areas based on historical data. The majority of commercial and industrial areas are within the combined sewer system and would not be discharged to an MS4 outfall if there was an illicit discharge. Screening priorities are therefore based primarily on time since last inspection to allow for all streams to be assessed in a 5-year period.

Dry Weather Screening of High-Priority Outfalls

An inspection form was created to document each outfall screening event. The inspection form has the following:

- The location and/or unique identifier for the outfall
- Time since last runoff-producing precipitation or snowmelt event
- Whether the outfall is discharging and, if so, a description of the estimated discharge rate and visual characteristics of the discharge (e.g., odor, color, clarity)
- Any observed indicators of a possible illicit discharge, including floatables, deposits, stains, and unusual vegetative conditions (e.g. dying or dead vegetation, excessive vegetative growth).
- The inspector's opinion as to whether the observed conditions indicate the potential for an ongoing or unknown past illicit discharge.

Where appropriate, upstream structures including manholes, junction boxes, and storm sewer segments may be inspected to assist in tracing suspected illicit discharges.

Investigation Procedures

HSU has established procedures for responding to suspected illicit discharges.

1. All complaints, reports, and observed illicit discharges shall be documented within HSU's tracking system.
2. Employees receiving a complaint or report shall notify the Stormwater Program Analyst (SPA) as soon as possible.
3. The SPA, in consultation with HSU's Director, shall determine whether other local, state, or federal agencies require notification.
4. City personnel shall initiate investigation activities as soon as practicable following notification. In no instance will an investigation be delayed greater than 48 hours from notification. .
5. Investigations may include site inspections, interviews, photographs, sampling, records review, dye testing, smoke testing, CCTV inspection, and other methods necessary to identify the source of the discharge.
6. Upon confirmation of an illicit discharge, HSU shall require corrective action and pursue enforcement as appropriate.

Measurable Goals

HSU shall evaluate implementation of this MCM through the following measurable goals:

- Maintain and update the MS4 map annually
- Screen a minimum of 50 outfalls annually
- Investigate 100 percent of reported illicit discharges
- Document all investigations and enforcement actions
- Eliminate confirmed illicit discharges within a reasonable timeframe based on severity and complexity
- Track the number of complaints received, investigations conducted, violations issued, and discharges eliminated
- Report IDDE activities annually in the MS4 Annual Report.

SECTION 8. CONSTRUCTION SITE RUNOFF CONTROL – MCM #4

Objective

The objective of this Minimum Control Measure (MCM) is to reduce pollutants in stormwater runoff from construction activities through implementation and enforcement of erosion and sediment control requirements for regulated construction activities.

In accordance with the conditions of the WV/NPDES Permit, regulated construction activities include (unless otherwise exempted by applicable Federal or State law):

1. Land disturbance activities resulting in the disturbance of one (1) acre or greater
2. Land disturbance activities of less than one (1) acre that are part of a larger common plan of development or sale that will ultimately disturb one (1) acre or greater;

HSU requires an Erosion and Sediment Control Permit for any land-disturbing activity of 10,000 square feet or greater pursuant to Article 970 of the Codified Ordinances. This threshold includes more projects compared to the Permit designated threshold of 1 acre. Note that sites less than 1 acre of land disturbance are not regulated by the WV/NPDES Permit conditions.

Legal Authority

HSU maintains legal authority to regulate construction-site stormwater runoff through Article 970 – Erosion and Sediment Control of the Codified Ordinances.

Article 970 establishes requirements for:

- Erosion and sediment control planning
- Construction-site best management practices (BMPs)
- Inspection and monitoring
- Enforcement and corrective actions
- Stop-work authority
- Civil penalties and cost recovery.

Plan Review and SWPPP Requirements

Prior to commencement of regulated construction activities, project operators shall submit a Stormwater Pollution Prevention Plan (SWPPP) and associated erosion and sediment control plans for review and approval.

For regulated construction activities with land disturbances of 1 acre or greater, they must provide proof of coverage under WV/NPDES permit number WV0115924 or an individual permit issued by the West Virginia Department of Environmental Protection.

Receipt of WVDEP permit authorization shall be considered evidence that applicable state permitting requirements have been met. However, HSU retains authority to review proposed construction activities for compliance with local erosion and sediment control requirements and may require additional measures necessary to comply with Article 970.

Public Reporting

HSU maintains mechanisms through which residents may report concerns regarding construction-site runoff, sediment tracking, inadequate BMPs, or other potential violations. Reports received through HSU's stormwater reporting system shall be documented and investigated as appropriate.

Construction Site Inspections

HSU will conduct inspections of regulated construction activities to evaluate compliance with approved plans, permit requirements, and ordinance provisions.

Inspection Frequency

- All regulated construction sites shall be inspected at least once during active land disturbance activities.
- High-priority construction sites shall be inspected at least once per month during active construction.

High-priority sites may include:

- Sites disturbing more than five (5) acres
- Sites discharging to impaired waters
- Sites located within TMDL watersheds
- Sites with a history of compliance issues
- Sites determined by HSU to present an elevated risk to water quality.

Inspection Documentation

Inspection reports shall document:

- Site conditions
- BMP installation and maintenance
- Compliance deficiencies
- Corrective actions required
- Follow-up inspection needs.

Inspection findings and corrective actions shall generally be communicated to the site operator within seven (7) calendar days of the inspection.

Enforcement Procedures

HSU maintains procedures for escalating enforcement actions when violations are identified.

Enforcement actions authorized under Article 970 may include:

- Verbal notification
- Written warning letters
- Notices of violation
- Corrective action orders
- Stop-work orders
- Civil penalties
- Legal action as authorized by ordinance.

Enforcement actions shall be commensurate with the severity, duration, and recurrence of violations.

Measurable Goals

HSU shall evaluate implementation of this MCM through the following measurable goals:

- Review 100 percent of submitted erosion and sediment control permit applications
- Verify WV/NPDES permit coverage for all applicable regulated construction activities
- Inspect all regulated construction sites at least once during active land disturbance
- Inspect all regulated high-priority construction sites at least monthly during active construction
- Investigate construction-related complaints received from the public
- Document all inspections, violations, and enforcement actions
- Report construction-site runoff control activities annually in the MS4 Annual Report

SECTION 9. POST-CONSTRUCTION STORMWATER MANAGEMENT – MCM #5

Objective

The objective of this Minimum Control Measure (MCM) is to reduce pollutants in stormwater runoff and minimize hydrologic impacts associated with new development and redevelopment after construction activities have been completed.

HSU shall implement and enforce a program that addresses stormwater runoff from new development and redevelopment projects. The program is intended to protect water quality, reduce sediment transport, minimize stream channel degradation, reduce localized flooding, and preserve watershed functions through the implementation of permanent stormwater management practices.

Legal Authority

HSU maintains legal authority to regulate post-construction stormwater management through applicable provisions of the Codified Ordinances – Article 971 for stormwater management requirements related to development. HSU may require installation, operation, maintenance, repair, replacement, and inspection of permanent stormwater management practices as conditions of development approval.

Applicability

For purposes of this SWMP, the regulated construction activities that require stormwater management include (unless otherwise exempted by applicable Federal or State law):

1. Land disturbance activities resulting in the disturbance of one (1) acre or greater
2. Land disturbance activities of less than one (1) acre that are part of a larger common plan of development or sale that will ultimately disturb one (1) acre or greater.

In addition to the requirements of this permit, HSU requires post-construction stormwater management for the following activities:

1. Land development that creates 5,000 square feet or more of impervious cover
2. Land development activities that are less than 5,000 square feet if such activities are part of a larger common plan of development
3. Land redevelopment activities that will result in the improvement, restoration, rebuilding or new construction on any developed property that encompasses 5,000 square feet or more of impervious surface, and has one of the following characteristics: i) Land that currently has an existing structure; ii) Land that is currently covered with an impervious surface, such as a parking lot or roof; or iii) Land that is currently degraded and is covered with sand, gravel, stones, or other non-vegetative covering.
4. The Huntington Stormwater Utility may, upon approval of city council, establish certain exemptions to the applicability of this article by regulation.

HSU may require stormwater management measures for projects with less land disturbance/impervious surface where necessary to protect public infrastructure, receiving waters, or adjacent properties. Note that sites less than 1 acre of land disturbance are not regulated by the WV/NPDES Permit conditions.

Regulated Development Projects – Post Construction Stormwater Management Standards

All regulated development projects shall implement permanent stormwater management practices designed in accordance with one of the following Standards:

- *Development Standard 1: Runoff Retention* - Development projects must be designed to retain a volume of runoff equivalent to 1.0 inch (or greater) multiplied by the total post-construction impervious surface area on the site. HSU may allow the runoff retention standard to be lowered to 0.8 inch (or greater) for high-density development (greater than 7 units per acre) or transit-oriented development projects. HSU may reject as incomplete any Post Construction Stormwater Management Plan (PCSMP) relying on Development Standard 1 that does not include a completed copy of the most current version of Department's Compliance Spreadsheet: https://dep.wv.gov/WWE/Programs/stormwater/MS4/permits/Pages/ToolsandGuidance.aspx (or alternative documentation designated by HSU) demonstrating compliance with this standard;
- *Development Standard 2: Extended Infiltration* - Development projects must be designed to treat stormwater before releasing it to surface waters by extended or engineered infiltration. Extended filtration practices that are designed to capture and manage up to one inch of rainfall may discharge through an underdrain system. HSU may reject as incomplete any PCSMP relying on Development Standard 2 that does not include calculations and other support sufficient to demonstrate compliance with this standard.
    - *Note:* If a development project utilizes an underdrain system, there will be no credit given as outlined in Development Standard 1 to lower the volume from the 1-inch capture standard.

Regulated Redevelopment Projects – Post Construction Stormwater Management Standards

Redevelopment, including brownfield development, means any construction, alteration, or improvement, including, but not limited to, the demolition or building of structures, filling, grading, paving, or excavating, where existing land use is residential, commercial, industrial, or institutional. Ordinary maintenance activities, remodeling of existing buildings, resurfacing of paved areas, and exterior changes or improvements are not considered to be redevelopment activities for the purposes of this SWMP.

All regulated redevelopment projects shall implement permanent stormwater management practices designed in accordance with one of the following Standards:

- Redevelopment Standard 1: Runoff Retention. Regulated Redevelopment Projects must be designed to retain a volume of runoff equivalent to 0.8 inch (or greater) multiplied by the total post-

construction impervious surface area on the site. HSU may allow the runoff retention standard to be lowered to 0.5 inch (or greater) for high-density development (greater than 7 units per acre), transit-oriented development, or brownfield redevelopment. HSU may reject as incomplete any PCSMP relying on Redevelopment Standard 1 that that does not include a completed copy of the most current version of Department's Compliance Spreadsheet: https://dep.wv.gov/WWE/Programs/stormwater/MS4/permits/Pages/ToolsandGuidance.aspx (or alternative documentation designated by HSU) demonstrating compliance with this standard.

- Redevelopment Standard 2: Extended Infiltration. Regulated Redevelopment Projects must be designed to treat stormwater before releasing it to surface waters by extended or engineered infiltration. Extended filtration practices that are designed to capture and manage up to one inch of rainfall may discharge through an underdrain system. HSU may reject as incomplete any PCSMP relying on Redevelopment Standard 2 that does not include calculations and other support sufficient to demonstrate compliance with this standard.
    - *Note:* If a redevelopment project utilizes an underdrain system, there will be no credit given as outlined in Redevelopment Standard 1 to lower the volume from the 1-inch capture standard.
- Redevelopment Standard 3: Impervious Area Reduction. Regulated Redevelopment Projects that produce a net decrease of 50% or more impervious surfaces within the limits of disturbance will be considered in compliance with this standard.

Regulated redevelopment projects consisting solely of the maintenance, repair, or improvement of existing roadways—including roadway widening of less than one travel lane, shoulder additions, intersection safety improvements, upgrades to existing drainage systems, resurfacing or repaving—along with existing sidewalks and parking lots, shall be in compliance with the Redevelopment Standards upon approval by HSU's Director. These projects are still encouraged to incorporate stormwater management improvements where practicable and feasible.

The aforementioned standards are designed to accomplish the following water quality benefits:

- Reduce pollutant loading
- Minimize erosion and sedimentation
- Reduce peak stormwater runoff rates
- Encourage infiltration where feasible
- Protect stream channels and aquatic habitat
- Reduce impacts to impaired waters
- Promote groundwater recharge where appropriate.

Stormwater management practices shall be designed in accordance with applicable City standards, the West Virginia Stormwater Management and Design Guidance Manual, and other accepted engineering guidance approved by HSU.

Stormwater Management Design Hierarchy

The Huntington Stormwater Utility (HSU) encourages the use of stormwater management practices that mimic natural hydrologic processes by reducing runoff volume, promoting infiltration where feasible, and treating stormwater as close to its source as practicable. Designers are expected to evaluate stormwater management alternatives using the following hierarchy of preferred BMPs. Higher-priority practices should be incorporated whenever site conditions, soil characteristics, groundwater conditions, topography, and other engineering constraints allow. HSU acknowledges that local soil constraints (e.g., clay soils, high groundwater in river-adjacent areas) will drive which practices are feasible.

Preferred Stormwater Management Hierarchy

1. Infiltration

Infiltration practices are the preferred stormwater management approach where site conditions are suitable. These practices reduce runoff volume by allowing stormwater to infiltrate into the underlying soils, thereby restoring natural groundwater recharge, reducing peak runoff rates, and removing pollutants through filtration and biological processes.

Examples include:

- Infiltration basins/ trenches
- Dry wells
- Permeable pavement with infiltration beds
- Bioretention facilities designed without underdrains

2. Green Infrastructure

Practices that return captured stormwater to the atmosphere through evaporation and plant transpiration are encouraged where appropriate. These systems reduce runoff while providing aesthetic, ecological, and urban heat island benefits.

Examples include:

- Green roofs
- Vegetated planters
- Bioretention with engineered soil media
- Tree box filters
- Urban tree planting integrated with stormwater management

3. Runoff Reuse

Where infiltration is not practical or desirable, stormwater should be captured and reused for beneficial purposes. Reuse practices reduce potable water demand while decreasing stormwater runoff volumes.

Examples include:

- Rainwater harvesting systems
- Rain barrels
- Cisterns
- Irrigation reuse systems
- Non-potable building water reuse systems

4. Extended infiltration

Where infiltration or runoff reuse cannot be fully achieved because of site limitations such as poor soil, high groundwater, contaminated soil, or bedrock, filtration practices should be utilized to remove pollutants before stormwater is discharged.

Examples include:

- Surface sand filters
- Perimeter sand filters
- Media filters
- Bioretention facilities with underdrains
- Manufactured treatment devices approved by HSU

5. Detention

Detention practices will not be permitted for stormwater management in the regulated MS4 area because they primarily reduce peak discharge rates rather than runoff volume. For developments outside of the regulated MS4 area, detention facilities may be considered where preferred BMPs cannot fully satisfy stormwater management objectives. Whenever practicable, detention facilities should be designed in conjunction with runoff reduction or water quality treatment practices. Therefore, detention practices should generally be considered the least preferred structural stormwater management option.

Examples include:

- Dry detention basins
- Extended detention basins
- Underground detention systems
- Oversized storm sewer storage systems

BMP Selection

Stormwater management facilities shall be selected and designed based upon site-specific conditions, including hydrologic soil group, groundwater elevation, topography, available space, utility conflicts, environmental constraints, and maintenance considerations. HSU recognizes that no single BMP is appropriate for every site and encourages the use of treatment trains and multiple BMPs to maximize stormwater quality and quantity benefits.

Applicants shall demonstrate that higher-priority BMPs are not feasible before considering extended infiltration or detention practices. Where infiltration or runoff reduction practices are determined to be infeasible, the design engineer shall document the basis for that determination within the Post-Construction Stormwater Management Plan (PCSMP). HSU may require additional information supporting the selection of proposed BMPs when necessary to ensure compliance with this SWMP and applicable design standards.

Long-Term Operation and Maintenance

Property owners shall be responsible for the operation, maintenance, repair, and replacement of privately owned stormwater management facilities.

Prior to final approval, applicants will complete a maintenance agreement that will be recorded with the deed at the county courthouse. This agreement includes:

- An Operation and Maintenance (O&M) Plan
- Maintenance schedules
- Responsible party information
- Inspection procedures
- Access provisions for City inspection

Inspection and Maintenance Verification

HSU maintains an inventory of known post-construction stormwater management facilities and conducts periodic inspections of stormwater facilities to verify:

- Proper operation
- Adequate maintenance
- Structural integrity
- Compliance with approved plans.

Deficiencies identified during inspections are documented and corrective actions required.

Enforcement

Failure to maintain post-construction stormwater management facilities may result in:

- Written notices of deficiency
- Corrective action orders
- Civil penalties
- Cost recovery actions
- Revocation of permits or approvals
- Other remedies as authorized by City Ordinance.

Measurable Goals

HSU evaluates implementation of this MCM through the following measurable goals:

- Review 100 percent of regulated development and redevelopment projects for post-construction stormwater management requirements
- Maintain an inventory of publicly and privately owned post-construction stormwater management facilities.
- Conduct inspections of stormwater management facilities.
- Document maintenance deficiencies and corrective actions
- Track the number and type of stormwater management facilities installed annually
- Report post-construction stormwater management activities annually in the MS4 Annual Report.

Expected Water Quality Benefits

Implementation of this program will reduce pollutant loading, decrease sediment transport, improve stream health, reduce localized flooding, and support compliance with applicable TMDLs and receiving water quality standards throughout the city.

SECTION 10. POLLUTION PREVENTION AND GOOD HOUSEKEEPING - MCM #6

Objective

The objective of this Minimum Control Measure is to implement good housekeeping procedures designed to minimize the discharge of pollutants from municipal operations and activities to the MEP standard.

The City of Huntington is served primarily by a combined sewer system operated by the Huntington Sanitary Board. Municipal facilities and operations with the greatest potential to generate stormwater pollutants, including public works maintenance operations, vehicle maintenance facilities, salt storage facilities, and wastewater treatment operations, are located within the combined sewer service area and do not discharge stormwater to the regulated MS4.

Because these facilities do not discharge to the regulated MS4, Huntington Stormwater Utility's Pollution Prevention and Good Housekeeping Program focuses on municipal activities occurring within the regulated MS4 service area, including street sweeping, storm sewer system maintenance, municipal construction and maintenance activities, and employee training.

Best Management Practices

BMP #1 - Written Pollution Prevention and Good Housekeeping Procedures

- Measurable Goal - Maintain written procedures addressing municipal activities that may impact water quality within the regulated MS4 service area.
- Procedures shall address:
    - Street sweeping
    - Storm sewer system maintenance
    - Municipal construction and maintenance activities
    - Illicit discharge reporting
    - Spill response and notification procedures
- Implementation Schedule - Existing procedures shall be reviewed annually and updated as necessary.

BMP #2 - Street Sweeping

- Measurable Goal - The Huntington Sanitary Board contracts for street sweeping activities throughout the city, including streets located within the regulated MS4 service area.
    - Records shall include:
        - Dates of sweeping activities
        - Quantity of debris collected
- Implementation Schedule - Conduct annually and document results.

BMP #3 - Storm Sewer System Maintenance

- Measurable Goal – HSB maintains publicly owned stormwater infrastructure located within the regulated MS4 service area to ensure proper operation and minimize pollutant discharges.
- Activities may include:
    - Catch basin cleaning
    - Culvert maintenance
    - Ditch maintenance
    - Storm sewer repairs
    - Debris removal
- Implementation Schedule – HSB conducts these activities as needed throughout the permit term.

BMP #4 - Municipal Construction and Maintenance Activities

- Measurable Goal - Municipal employees and contractors performing work within the regulated MS4 service area shall implement appropriate erosion and sediment control measures and good housekeeping practices.
- Implementation Schedule - Implemented continuously throughout the permit term.

BMP #5 - Employee and Contractor Training

- Measurable Goal - Provide annual stormwater training to applicable employees and contractors whose activities may affect stormwater quality.
- Training topics shall include, as applicable:
    - Good housekeeping practices
    - Proper chemical and material storage and use
    - Spill prevention and response
    - Trash management
    - Erosion and sediment control requirements
    - Stormwater pollution prevention
    - Illicit discharge detection and reporting
- New employees shall receive training within three months of hire or assignment to applicable duties.
- Implementation Schedule - Conduct annually.

BMP #6 - Annual High-Priority Facility Evaluation

- Measurable Goal - Conduct an annual review of municipal facilities and operations to determine whether any municipally owned or operated facility has become a High-Priority Facility that drains to the regulated MS4.
- Implementation Schedule - Conduct annually and document findings.

Municipal Facilities

Huntington Stormwater Utility has evaluated municipal facilities owned and operated by the City of Huntington and the Huntington Sanitary Board.

Municipal facilities with significant pollutant-generating activities, including public works maintenance operations, vehicle maintenance facilities, salt storage facilities, and wastewater treatment operations, are located within the combined sewer service area and do not discharge to the regulated MS4. Huntington Stormwater Utility shall maintain information regarding municipally owned stormwater infrastructure, right-of-way, and municipal properties located within the regulated MS4 service area.

At this time, there are no City owned High-Priority Facilities that drain to the regulated MS4.

Operation and Maintenance Program

Operation and maintenance activities conducted within the regulated MS4 service area include:

- Street sweeping
- Storm sewer system maintenance
- Drainage structure maintenance
- Debris removal
- Municipal construction and maintenance activities

These activities shall be conducted in accordance with established municipal procedures.

Pollution Prevention Plans

At this time, HSU has not identified any High-Priority Facilities that discharge to the regulated MS4 and therefore no facility-specific SWPPPs are required. An annual evaluation shall be conducted to determine whether any municipal facility becomes subject to High-Priority Facility requirements.

Program Evaluation

Program effectiveness shall be evaluated annually using:

- Number of employees trained.
- Quantity of debris removed through street sweeping.
- Number of storm sewer maintenance activities completed.
- Results of annual municipal facility evaluations.
- Identification and correction of observed pollution sources.

The results of the annual evaluation shall be used to improve the Pollution Prevention and Good Housekeeping Program as necessary.

SECTION 11. TMDL SPECIAL CONDITIONS

The City of Huntington discharges stormwater into the streams shown in Section 3 of this SWMP. Wasteload allocations have been issued to Huntington for fecal coliform and iron on several of these streams. The Minimum Control Measures are implemented throughout the city to mitigate the potential discharge of pollutants to these streams. Best management practices were chosen to reduce these pollutants. Any significant sources of pollutants that discharge into the MS4 will be identified and eliminated if not approved or covered under a separate NPDES Permit.

Bacterial TMDLs

HSU will implement the following three strategies to reduce the load of bacteria to the receiving streams that receive stormwater from the MS4's jurisdiction.

1. HSU provides signage to pick up dog waste, provide waste bags or provide disposal containers to citizens or organizations through public education events or direct donations.

2. HSU (through partnership with the Huntington Sanitary Board) cleans out storm drains to remove accumulated organic debris, sediment, and potential bacterial sources from storm drain infrastructure.

3. HSU implements a stormwater management program for land disturbance activities that create 5,000 square feet or greater of impervious surface. This exceeds the Permit requirements and contributes to a reduction in bacterial loads to receiving streams.

Local Sediment, Metals, and Nutrients TMDLs

HSU implements the following BMPs to reduce the loads of associated sediment, metals (such as iron), and nutrients on receiving streams.

- HSU, in conjunction with HSB, implements routine catch basin cleaning to remove debris (including sediment, metal and nutrients).
- HSU continues to implement Ordinance 970 which controls and mitigates erosion of soil and sediment within the City of Huntington.

PCB TMDLs

HSU does not have any known significant sources of PCBs that drain to the MS4. If sources are identified, an inventory will be created with the following information:

- Location of the potential source
- Whether or not the potential source is from current site activities or activities previously conducted at the site that have been terminated (i.e., legacy activities).
- A description of any measures, if known, being implemented or to be implemented to prevent exposure to stormwater and the discharge of PCBs from the site.

If at any time during the term of this general permit, HSU discovers a previously unidentified significant source of PCBs within the MS4 Service Area, HSU shall notify the Department in writing within 30 days of discovery.

Dioxin TMDLs

A TMDL for dioxin has been developed for the City of Huntington, however, no wasteload allocations have been given. Potential sources of dioxins are from contaminated sediment, atmospheric deposition from combustion, and industrial areas with contamination. There are no known discrete sources of dioxin in the city at this time.

The following practices will be utilized to minimize potential nonpoint sources of dioxin:

- Prohibit and enforce no burning of solid waste in the city. The City's Ordinance 951.13 prohibits any person from burning rubbish or industrial, or commercial waste.
- HSU, in conjunction with the HSB, will continue to street sweep the city yearly and clean out catch basins of debris that potentially could be contaminated with dioxin.

SECTION 12. RECORDKEEPING, REPORTING, AND PROGRAM EVALUATION

Recordkeeping

- Record Retention
  - HSU maintains records to demonstrate compliance with the MS4 Permit and the SWMP.
  - Records shall be retained for a minimum of three (3) years beyond the expiration date of the permit and any authorized permit continuation period.

- Availability of Records - Records related to implementation of the SWMP and compliance with the Permit shall be made available to the WVDEP upon request.
  - Records shall also be made available to the public in accordance with applicable Freedom of Information Act (FOIA) requirements and state public records laws.

- Electronic Recordkeeping
  - HSU may maintain records electronically through Cityworks, GIS databases, document management systems, spreadsheets, inspection databases, or other electronic recordkeeping systems.
  - Electronic records are organized and maintained to allow efficient retrieval during annual reporting, permit audits, compliance inspections, and public records requests.

- Records Maintained
  - As applicable, HSU shall maintain records associated with implementation of each Minimum Control Measure (MCM), including but not limited to:
    - Public education and outreach materials and activities
    - Public involvement and participation activities
    - Illicit discharge detection and elimination investigations and enforcement actions
    - Construction site runoff control inspections and enforcement actions
    - Post-construction stormwater management reviews, approvals, inspections, and maintenance documentation
    - Municipal operations and good housekeeping activities
    - Employee training records
    - Street sweeping records
    - Storm sewer system inspection and maintenance records
    - Facility inspections and evaluations
    - Mapping updates
    - Complaints and responses
    - Corrective action
    - Annual program evaluations
    - Annual reports submitted to WVDEP

Annual Program Evaluation

HSU shall conduct an annual evaluation of the Stormwater Management Program to determine the effectiveness of each Minimum Control Measure and evaluate whether modifications to the SWMP are necessary.

The annual evaluation shall consider:

- Progress toward measurable goals
- Completion of implementation schedules
- BMP effectiveness
- Compliance with permit requirements
- Identified program deficiencies
- Corrective actions completed
- Recommended program improvements

The results of the evaluation shall be documented and used to improve future implementation of the SWMP.

Annual Reporting

- Reporting Period - The reporting period shall extend from July 1 through June 30 of each year.
- Annual Report Submission - HSU shall submit an Annual Report to WVDEP no later than October 1 of each year using the Department's Electronic Submission System (ESS) or other reporting mechanism specified by WVDEP

The Annual Report shall include, at a minimum:

- Permittee name, permit number, and registration number
- The reporting period covered by the report
- The certification statement required by applicable state regulations
- Documentation of activities completed under each of the six Minimum Control Measures
- Progress toward achieving measurable goals established in the SWMP
- A summary of BMP implementation during the reporting period
- A description of any modifications made to the SWMP
- A summary of compliance activities, inspections, maintenance activities, and enforcement actions completed during the reporting period
- An evaluation of the effectiveness of each MCM and the overall Stormwater Management Program
- A determination regarding whether revisions to the SWMP are necessary to maintain compliance with permit requirements and achieve water quality objectives

TMDL Reporting

If applicable, HSU shall include in the Annual Report a summary of activities performed to implement any approved TMDL-related BMPs required by the MS4 General Permit, including progress toward pollutant reduction goals and implementation schedules identified in the SWMP.

Program Review and Continuous Improvement

HSU shall periodically review SWMP implementation throughout the permit term and make adjustments as necessary to improve program effectiveness, maintain permit compliance, and protect water quality.

Program modifications identified through annual evaluations, inspections, audits, enforcement activities, citizen complaints, or changing regulatory requirements shall be incorporated into the SWMP as appropriate.

SECTION 13. DOCUMENTS INCORPORATED BY REFERENCE

APPENDIX A – DRY WEATHER RECONNAISSANCE FORM – OUTFALLS WITHIN CITY OF HUNTINGTON

DRY WEATHER RECONNAISSANCE FORM - OUTFALLS WITHIN CITY OF HUNTINGTON

Location (Describe)	Outfall Pipe Description	Image #	Discharging? If so, describe volume and visual characteristics.	Recent or Past Illicit Discharge Indicators? Deposits, stains, dead vegetation.	Time - Last Runoff

APPENDIX B – COMPLAINT AND ILLICIT DISCHARGE TRACKING FORM

Huntington Stormwater Utility
P.O. Box 7578
Huntington, WV 25777
304-696-5564

Complaint and IDDE Tracker

Date Reported or Known	Summary of complaint or illicit discharge (who reported and pertinent details)	Results of Investigation - Identify Source?	Resolution - Remediation - Enforcement Actions	Date Closed

Appendix C - DEFINITIONS

Unless the context in which used clearly requires a different meaning, as used in this general permit:

"Annual Report" means a document submitted to the Department of Environmental Protection no later than October **1** of each year in an electronic format via the Department's Electronic Submittal System that summarizes and evaluates the HSU's implementation of this SWMP during the reporting year.

"Best management practices" or "BMPs" means schedules of activities, prohibitions of practices, maintenance procedures, policies, and other management practices to prevent or reduce the pollution of waters of the State of West Virginia. BMPs also include treatment requirements, operating procedures, and practices to control site runoff, spillage or leaks, waste disposal or drainage from material storage. BMP's can include structural as well as non-structural practices.

"Common Plan of Development" is a contiguous construction project where multiple separate and distinct construction activities may be taking place at different times on different schedules but under one plan. The "plan" is broadly defined as any announcement or piece of documentation or physical demarcation indicating construction activities may occur on a specific plot; included in this definition are most subdivisions and industrial parks.

"Dry Weather" means a period in which there has not been a measurable precipitation or snowmelt event within a twenty-four (24) hour period.

"Dry Weather Screenings" are on-site inspections of storm water outfalls during dry periods for the purpose of locating and evaluating the quality of discharges in an effort to reduce or eliminate pollution.

"Illicit Discharge" means any discharge to a municipal separate storm sewer that is not composed entirely of storm water except (1) discharges pursuant to a NPDES permit (other than the NPDES permit for discharges from the municipal separate storm sewer) and (2) non-stormwater discharges listed in Section 7 - ILLICIT DISCHARGE DETECTION AND ELIMINATION – MCM #3.

"Impervious" means a surface composed of material that significantly impedes or prevents natural infiltration of water into soil.

"Maintenance Agreements" means a formal written agreement or contract between the Huntington Stormwater Utility and a property owner that obligates the owner and its successors and assigns to inspect and maintain stormwater management facilities installed in accordance with this general permit in perpetuity.

"Maximum Extent Practicable" HSU selects appropriate Best Management Practices (BMPs) based on an evaluative process which includes the following: public input and acceptance, consideration of the receiving water, technical feasibility of selected BMP, cost of implementation, regulatory compliance, and effectiveness.

"Minimum Control Measure" or "MCM" means the six programmatic elements of this Stormwater Management Plan and which are designed to result in the reduction of the discharge of pollutants from the regulated Small MS4. The programmatic elements include: (1) Public Education and Outreach, (2) Public Involvement and Participation, (3) Illicit Discharge Detection and Elimination, (4) Controlling Runoff from Construction Sites, (5) Post-Construction Stormwater Management, (6) Pollution Prevention and Good Housekeeping.

"Municipal Separate Storm Sewer System" or "MS4" means a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains) owned or operated by any municipality, sewer or sewage board, State agency or Federal agency or other public entity that discharges directly to surface waters of the State of West Virginia that is designed or used for collecting or conveying storm water but which is not a combined sewer or part of a publicly owned treatment works.

"MS4 Service Area" is the drainage area in the City of Huntington that flows directly to waters of the State and is therefore a subjected to the regulated requirements of the Permit WV0116025.

"National Pollutant Discharge Elimination System" or "NPDES" means a provision of the Clean Water Act which regulates the discharge of pollutants into waters of the United States. This federally mandated permit program regulating point source discharges.

"Outfall" means a point source as defined by 40 CFR § 122.2 at the point where a municipal separate storm sewer discharges to waters of the State of West Virginia and does not include open conveyances connecting two municipal separate storm sewers, or pipes, tunnels or other conveyances which connect segments of the same stream or other waters of the State and are used to convey waters of the State.

"Pollutant of concern" means a pollutant which cause a water body to be placed on the Section 303(d) list of impaired waters and for which a wasteload allocation has been designated in an applicable Total Maximum Daily Load.

"Receiving water" means a surface water of the State of West Virginia into which stormwater is discharged from an outfall.

"Redevelopment," including brownfield development, means any construction, alteration, or improvement, including, but not limited to, the demolition or building of structures, filling, grading, paving, or excavating, where existing land use is residential, commercial, industrial, or institutional. Ordinary maintenance activities, remodeling of existing buildings, resurfacing of paved areas, and exterior changes or improvements are not considered to be redevelopment activities for the purposes of this SWMP.

"Regulated Construction Activity" means a construction activity in the MS4 Service Area that results in a land disturbance of (i) one acre or greater or (ii) less than an acre if part of a larger common plan of development or sale that will result in land disturbance of one acre or greater, unless such activities are exempt from NPDES permitting requirements by Federal or State law.

"Regulated Development Project" means a development project in the MS4 Service Area that has a land disturbance area of (i) one acre or greater or (ii) less than an acre if part of a larger common plan of development or sale that will result in land disturbance of one acre or greater.

"Regulated Redevelopment Project" means a redevelopment project in the MS4 Service Area that has a land disturbance area of (i) one acre or greater or (ii) less than an acre if part of a larger common plan of development or sale that will result in land disturbance of one acre or greater.

"Stormwater Management Program" or "SWMP" means a document describing the management program that involves public participation and intergovernmental coordination to reduce the discharge of pollutants to the maximum extent practicable, to protect water quality, and to satisfy the appropriate water quality

requirements of the CWA and regulations and the State law and its attendant regulations, using management practices, control techniques, and system, design, and engineering methods, and such other provisions that are appropriate.

"Stormwater Pollution Prevention Plan" or "SWPPP" means a document that is prepared in accordance with good engineering practices and that identifies potential sources of pollutants that may reasonably be expected to affect the quality of stormwater discharges and required measures to minimize the water quality impacts from those discharges. In the context of stormwater associated with a construction project or land-disturbing activity, a SWPPP consists of an approved erosion and sediment control plan, approved post-construction stormwater management plan, and other provisions.

"Total Maximum Daily Load" or "TMDL" means the sum of the individual wasteload allocations for point sources, load allocations (LAs) for nonpoint sources, natural background loading, and a margin of safety calculated the pollutant loading that a waterbody can receive and still safely meet water quality standards.