

**TOWN OF CHRISTIANSBURG  
STORMWATER MANAGEMENT PROGRAM**

**ADDENDUM FOR  
2008-2009 ANNUAL REPORT**

**NPDES PHASE II SMALL MS4  
VPDES PERMIT NO. VAR 040025**



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Prepared For:

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**The following is an addendum to the Town of Christiansburg MS4  
Annual Report for the 2008-2009 reporting year.**

**Minimum Control Measure No. 1: Public Education and Outreach**

**A. Status of Compliance with Permit Conditions**

For the 2008-2009 reporting year, MCM 1 was in general compliance with the permit conditions. The Town executed a public education program that distributed public education materials and conducted public outreach to inform and educate the general public about stormwater impacts. The aim of the public education program was to increase individual, household, public employee, business and general public knowledge about ways to reduce stormwater pollution and associated hazards from illegal dumping in compliance with the Town's MS4 Program Plan and permit conditions.

**B. Assessment of the Appropriateness of BMPS**

The four BMPs for this category were appropriate for MCM 1. The public education program used various methods and means to target a diverse group of audiences. The BMP 1.1 Stormwater Webpage provided self-serve education material for anyone on the internet. The BMP 1.2 Stormwater Mailer provided information to all Christiansburg addresses and P.O. Box holders. The BMP 1.3 Model Stormwater System was designed in preparation for construction next year which will serve as a full-size functioning model BMP, with appropriate informational signs. The BMP 1.4 Storm Drain Labeling practice reached into individual neighborhoods providing a No Dumping message on MS4 inlets. These various BMPs were appropriate for providing stormwater education for the Town of Christiansburg's MS4.

**C. Progress towards achieving measurable goals for the MCM**

The measurable goals for MCM1 were achieved. The Town website was maintained to provide basic stormwater education for website users. The stormwater mailer was sent to all business, residential, and commercial addresses and P.O. Boxes in Christiansburg, requiring the printing and mailing of over 10,000 mailers. An additional 100 storm drain structures were marked with No Dumping messages. All these public education items made information about stormwater, stormwater pollution, and stormwater pollution prevention readily available to everyone within the Town of Christiansburg, which were the measureable goals for MCM 1.

**Minimum Control Measure No. 2: Public Involvement / Participation**

**A. Status of Compliance with Permit Conditions**

For the 2008-2009 reporting year, MCM 2 was not in general compliance with the permit conditions due to manpower constraints. The Town did not hold the planned public involvement meetings to satisfy the MS4 Program Plan and associated permit conditions. However, the Town has since held one meeting, and is planning to host a training event for the second meeting. On 22 April 2013 at 7:00PM, the Town's Engineering Department presented at a Town of Christiansburg Planning Commission Meeting on the Town's MS4 System and TMDLs affecting the Town. This presentation was at a

regularly scheduled meeting which was duly advertized and open to the public. The presentation briefly discussed the Town's MS4 system and went on to cover the various TMDLs and associated MS4 Waste Load Allocations. The Town will also host and participate in a 2-day DCR training event in place of the second meeting that was not held. June 4<sup>th</sup> and 5<sup>th</sup> are the proposed dates for the 2-day stormwater training event. Specific topics to be covered in the training include the Virginia Stormwater Management Law and Regulations, the Stormwater Handbook, the Stormwater BMP Clearinghouse, the E-Permitting System and the roles and responsibilities of a VSMP Administrator, Plan Reviewer and Inspector. These meetings are intended to bring MCM 2 into general compliance with the MS4 Program Plan and permit conditions.

**B. Assessment of the Appropriateness of BMPS**

The two existing and one new BMPs for this category were appropriate for MCM 2. The BMP 2.1 TMDL Session is intended to involve the general public with the Town's MS4 Program and provide specific information relating to TMDLs. The BMP 2.2 Developer / Engineer Stormwater Quality Treatment Design and Construction Information Session serves to improve the dialog with the local design community about various stormwater quality design and construction issues. The BMP 2.3 Provide MS4 Annual Report at Town Council Meeting will also involve the public at large by providing this report to Town Council and the general public. Should any discussion take place this would be appropriate public involvement. Accordingly, these various BMPs were appropriate for providing public involvement / participation opportunities for the Town of Christiansburg's MS4.

**C. Progress towards achieving measurable goals for the MCM**

Minimal progress was made towards achieving the measurable goals for MCM 2 during the reporting year. In accordance with FOIA, all MS4 records and reports were available for public review and inspection; however due to manpower constrains, the public involvement meetings did not occur as planned during the reporting year. The Town has since held one meeting, on 22 April 2013. This occurred at a Town of Christiansburg Planning Commission Meeting and has resulted in substantial progress towards meeting the measurable goals for MCM 2. Furthermore, the Town is planning on hosting a 2-day training event, which will result in the Town meeting all the measurable goals for MCM 2, as contained in the MS4 Program Plan.

**Minimum Control Measure No. 3: Illicit Discharge Detection and Elimination**

**A. Status of Compliance with Permit Conditions**

For the 2008-2009 reporting year, MCM 3 was in general but not complete compliance with the permit conditions. The Town did continue to update the MS4 mapping and perform outfall reconnaissance inspections on known outfalls; however it did not finalize the draft Illicit Discharge Detection and Elimination Plan (IDDE Plan) in accordance with the MS4 program plan. This plan will rely heavily on *Article III. Illicit Discharge* of Chapter 10 of Christiansburg Town Code. This article prohibits non-stormwater discharges to the MS4 that are not otherwise called out as exempt. By not finalizing the

IDDE Plan this portion of MCM 3 was not in full compliance the MS4 Program Plan and permit conditions.

**B. Assessment of the Appropriateness of BMPS**

The two BMPs for this category were appropriate for MCM 3. By continuing to update the GIS database of MS4 infrastructure, BMP 3.1 Storm Sewer System Mapping identifies and provides the location of Town facilities for IDDE activities. The BMP 3.2 Illicit Discharge Detection and Elimination Plan will identify and address non-stormwater discharges to the MS4 system. Together, these two BMPs are appropriate for MCM 3.

**C. Progress towards achieving measurable goals for the MCM**

Substantial progress was made towards achieving the measurable goals for MCM 3. The stormwater mapping updates allow the Town to effectively focus on MS4 infrastructure for IDDE activities. Although the IDDE Plan was not formally completed, the Town operated in accordance with the draft plan. During the reporting year, 4 suspected Illicit Discharge events occurred. In each instance the Town responded with immediate verbal cease and desist orders or written warnings referencing Town Code to the local neighborhood, when the discharging party could not be conclusively identified. Furthermore, the Town performed outfall reconnaissance on 100% of known MS4 outfalls (MS4 Program plan only required 50% of outfalls) demonstrating that the Town is actively seeking to locate and address non-stormwater discharges. The result of these efforts is that the Town has made substantial progress prohibiting, preventing, and causing the termination of illicit discharges to the MS4.

**Minimum Control Measure No. 4: Construction Site Stormwater Runoff Control**

**A. Status of Compliance with Permit Conditions**

For the 2008-2009 reporting year, MCM 4 was in general compliance with the permit conditions. The Town continued to operate a DCR approved Erosion and Sediment Control (ESC) program. This program required all land disturbances of larger than 10,000 square feet to occur in accordance with an approved ESC plan. Disturbances of larger than 1 acre are also required to provide documentation of a request for VSMP permit coverage prior to issuance of a local land disturbance permit. This program operates in accordance with *Article I. Erosion and Sediment Control* of Chapter 10 of Christiansburg Town Code and Virginia ESC Law and regulations. The ESC program provides for ESC plan approval, routine site inspections, enforcement, and tracking of land disturbance activities. These activities were reported to Virginia DCR as required.

**B. Assessment of the Appropriateness of BMPS**

The BMP for this category were appropriate for MCM 4. The ESC Program addresses the required elements for MCM 4 as provided in the regulations.

**C. Progress towards achieving measurable goals for the MCM**

The measurable goals were achieved for MCM 4 for the reporting year. The Town enforced and updated as needed, the programs and procedures that reduce pollutants in stormwater runoff from land development projects larger than 10,000 square feet.

## **Control Measure No. 5: Post-Construction Stormwater Management in New Development and Redevelopment**

### **A. Status of Compliance with Permit Conditions**

For the 2008-2009 reporting year, MCM 5 was in general compliance with the permit conditions. The Town continued to implement and enforce procedures to address postdevelopment stormwater runoff for all land development project disturbing greater than 10,000 square feet. This included requiring BMPs, adequate site design, a maintenance plan and maintenance agreements for regulated projects. The Town also performed BMP inspections for Town facilities and private facilities with maintenance agreements. The Town also reported to DCR all known stormwater management facilities within Town limits, in the required format.

### **B. Assessment of the Appropriateness of BMPS**

The two BMPs for this category were appropriate for MCM 5. The Town reviewed and approved stormwater management plans that were compliant with *Article II. Stormwater Management* of Chapter 10 of Christiansburg Town Code and Virginia Stormwater Management Law and regulations. These plans included appropriate maintenance plans and long-term maintenance agreements. Furthermore, the Town inspected all Town owned / operated facilities and those facilities which have maintenance agreements. The Town requires stormwater management plans for 10,000 square foot land disturbance projects in an effort to address the various impaired waters draining from Town. This requirement is more stringent than minimum state standards and is appropriate for the 305(b)/303(d) Impaired Waters draining from and downstream of town. These actions were appropriate for MCM 5.

### **C. Progress towards achieving measurable goals for the MCM**

The measurable goals were achieved for MCM 5 for the reporting year. The Town only approved plans with adequate stormwater management components for land development projects larger than 10,000 square feet. The Town inspected all required facilities as laid out in the MS4 Program Plan. This results in meeting the MCM 5 measurable goals.

## **Minimum Control Measure No. 6: Pollution Prevention / Good Housekeeping for Municipal Operations**

### **A. Status of Compliance with Permit Conditions**

For the 2008-2009 reporting year, MCM 6 was in general but not complete compliance with the permit conditions. The Town continued to participate in an annual household hazardous waste collection event, perform employee training, sweep Town maintained streets, perform leaf pickup, perform daily operations in a stormwater conscious manner (store road-salt indoors, use vehicle wash-bays draining to sanitary sewer) clean storm sewers, and perform MS4 Program Plan updates as needed. The Town did not complete a public works facility stormwater inspection in accordance with the MS4 Program Plan therefore was not in complete compliance with permit conditions.

**B. Assessment of the Appropriateness of BMPS**

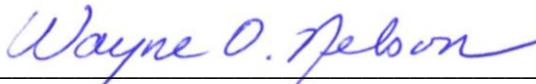
The six BMPs for this category were appropriate for MCM 6. The BMP 6.1 Household Hazardous Waste Collection event collected and properly disposed of hazardous waste that otherwise would have ended up in regular municipal garbage or being illegally dumped. The BMP 6.2 Street Sweeping Program picked up sediment, road grime, trash, and other gross pollutants which would have been washed into the nearest stream, had sweeping not occurred. The BMP 6.3 Leaf Pickup Program picked up leaves and other organic waste in an effort to properly dispose of these residential wastes. The BMP 6.4 Stormwater Pollution Prevention Measures in use during Municipal Operations provided stormwater training for municipal employees, required that road-salt be stored indoors such that it is not exposed to excess precipitation, and required that public works vehicles be cleaned in a wash facility that drains to the sanitary sewer. Also, the BMP 6.5 Storm Sewer Cleaning Program resulting in the cleaning of over 10,000 linear feet of storm sewer system, resulting in many tons of gross pollutants not being washed into receiving waters. These good housekeeping items appropriately target municipal operations to prevent unnecessary stormwater pollution. Finally, the BMP 6.6 Town's MS4 Program Updates ensured appropriate updates as required by permit, regulation, or law updates. In total, these BMPs were appropriate for MCM 6.

**C. Progress towards achieving measurable goals for the MCM**

Substantial progress was made towards achieving the measurable goals for MCM 6. The Town achieved most of the measureable goals by working to preventing unnecessary stormwater pollution by aiding in the collection and proper disposal of household waste. The Town also prevented unnecessary stormwater pollution by removing excess roadway dirt and sediment and by picking up fallen leaves. The Town did not hold the employee training by the end of the reporting year; however the required training still occurred, so the measurable goals for MCM 6 were achieved. This training took place on July 9 & 10, 2009.

**Authorized Program Signature Certification:**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those person directly responsible for gathering the information, the information submitted, is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

  
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Wayne O. Nelson, P.E.  
Director of Engineering and Special Projects  
Town of Christiansburg