

**E. coli Bacteria TMDL Action Plan
for Chickahominy River
Town of Ashland
Permit No. VAR040011
Updated June 2020**

1. **The TMDL project name** (*General Permit Part II B 3 (a)*);
2. **The EPA approval date of the TMDL** (*General Permit Part II B 3 (b)*);

E. coli TMDL Development for Chickahominy River and Tributaries
– EPA approval 9/19/2012, SWCB approval 3/25/2013

Bacterial Implementation Plan Development for the Chickahominy River and Tributaries
– EPA approval 9/2/2014, SWCB approval 2/25/2016

3. **The wasteload allocated to the permittee** (*General Permit Part II B 3 (c)*);

The final **annual** in-stream E. coli bacterial load modeled after TMDL allocation at the outlet of the entire Chickahominy River study area aggregated with Hanover County, Town of Ashland, and VDOT in Hanover County is 3.43E+10 cfu/yr.

The final **daily** in-stream E. coli bacterial load modeled after TMDL allocation at the outlet of the entire Chickahominy River study area aggregated with Hanover County, Town of Ashland, and VDOT in Hanover County is 9.38E+07 cfu/day.

4. **Identification of the significant sources of the pollutants of concern discharging to the permittee's MS4 and that are not covered under a separate VPDES permit. For the purposes of this requirement, a significant source of pollutants means a discharge where the expected pollutant loading is greater than the average pollutant loading for the land use identified in the TMDL** (*General Permit Part II B 3 (d)*);
 - Residential street run off to MS4 from areas where pet owners walk dogs.
 - Although the sanitary sewer system is owned by Hanover County Department of Public Utilities (DPU) and not owned by the Town of Ashland, leaking sanitary sewers are potential significant sources.

5. **Management practices and strategies used to reduce the pollutants of concern.**(*General Permit Part II B 3 (e)*);

- Education and outreach programs (dog waste disposal, stormwater pollution) have been implemented and are ongoing.
 - Provide signage to pick up dog waste, providing pet waste bags and disposal containers.
- A program of flushing and TV inspection of Town owned stormwater pipes has been implemented and is ongoing
 - Clean out storm drains to remove waste from urban wildlife

- Low Impact Design (LID) Town projects implemented in the Stony Run watershed:
 - Duncan Street: Filterra Bioretention Units (2)
 - Municipal Parking Lot: Permeable Pavers and Bioretention Area
 - Railroad Avenue Streetscape Phase I: Permeable Pavers and Bioretention
- Additional Town projects that are being considered for the future:
 - Stream Restoration for Licking Hole Creek by June 30, 2023;
 - Stream Restoration for Stony Run by June 30, 2023; and/or
 - Maple Street/Carter Park BMP by June 30, 2023 (beginning study in 2020).
- Street Sweeping has been implemented and is ongoing.
- State law requires that septic tanks located in a Chesapeake Bay Preservation Area be pumped out at least once every 5 years. The Town of Ashland sends reminders to residents with septic tanks reminding them that they need to be pumped out every 5 years.
- As mentioned earlier, Hanover County DPU owns the sanitary sewer system in the Town. The Hanover DPU maintains “on-call” capabilities and strives for a response time of no more than one hour. On-call DPU staff responds to all utility related issues including SSOs and pump station alarms to effectively minimize the length of SSO events.

Hanover County provides regular funding via its Capital Improvement Program and Operation & Maintenance budgets for sewer rehabilitation with the goals of extending asset life and minimizing the risk of SSO events.
- Ashland maintains a list of legal authorities aimed at reducing the pollutant identified in the WLA. Applicable ordinances include Chapter 4.1(Virginia code §§ 62.1-44.15:24) – Environmental Protection and Chapter 5 – Erosion and Sediment Control (Virginia code §§ 21-89.1—21-89.15).

Ashland received VSMP program approval from DEQ on July 1, 2013 and maintains a compliant Municipal Separate Storm Sewer System (MS4) Permit (VAR040011).

6. Any calculations required in accordance with management practices and strategies. (General Permit Part II B 3 (f));

No calculations were required.

7. Outreach strategy to enhance the public's education (including employees) on methods to eliminate and reduce discharges of the pollutants (General Permit Part II B 3 (g)); and

- Stormwater management and educational materials on Town website.
- Circulate fliers or post on social media quarterly on stormwater pollution prevention and pet waste cleanup.

- The Town coordinates with Randolph-Macon College annually on Macon a Difference Day (MaDD) for Earth Day. Randolph Macon College students volunteer, participate and engage the community in various activities such as:
 - stream cleanup,
 - storm drain marking,
 - circulate education fliers
 - demonstrate how to make rain barrels
 - BMP maintenance
 - installing and restocking pet waste stations
 - clean up litter in parks
 - and other water pollution prevention awareness activities
- Employee Training: Town staff trained on Illicit Discharge, Detection, and Elimination in accordance with the Town’s Stormwater Pollution Prevention Employee Training Plan dated June 2014.
- Employee Training: Town staff trained on Good Housekeeping procedures in accordance with the Town’s Stormwater Pollution Prevention Employee Training Plan dated June 2014.
- Town of Ashland Public Education and Outreach Plan.

8. A schedule of anticipated actions planned for implementation during this permit term (General Permit Part II B 3 (h)).

Practices	Implementation	Milestone
Education and outreach	On-going	Continuous
Pet waste disposal	On-going	Continuous
Illicit discharge, detection and elimination	On-going	Continuous
Stormwater pipe flushing and TV inspection	On-going	Continuous
Duncan Street: 2 Filterra Bioretention Units	Completed	--
Municipal Parking Lot: Permeable Pavers & Bioretention	Completed	--
Railroad Avenue Streetscape Phase I: Permeable Pavers & Bioretention	Completed	--
Licking Hole Creek Stream Restoration	June 30, 2023	June 30, 2023
Stony Run Stream Restoration	June 30, 2023	June 30, 2023
Maple Street/Carter Park BMP	June 30, 2023	June 30, 2023
Street sweeping	On-going	Continuous
Septic System Pump-outs, Maintenance Every 5 Years	On-going	Continuous
Employee training	On-going	Continuous
Town Code, Chapters 4 and 5	Completed	--
MS4 Permit VAR040011	On-going	Per Requirements

9. Provide an opportunity for public comment proposed on the local TMDL action plan. (General Permit Part II B 7)

Prior to submittal of the action plan required in Part II B 1, the permittee shall provide an opportunity for public comment proposed to meet the local TMDL action plan requirements for no less than 15 days.

The draft Chickahominy River and Tributaries TMDL Action Plan was posted on the Town's website for public comment for 15 days. At the conclusion of the 15 days, no comments were received. The Town will continue to post the Action Plan on the website, and will give consideration to any further comments received.