

October 7, 2015

Mr. Scott G. Mandirola  
West Virginia Department of Environmental Protection  
Division of Water and Waste Management  
601 57<sup>th</sup> Street, SE  
Charleston, WV 25304

Dear Mr. Mandirola:

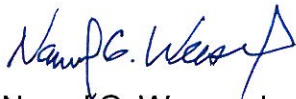
**Subject: WVU Signatory Authority Authorization**

I hereby authorize the following people of WVU Facilities and Services, Environmental Health and Safety, to sign all reports, permit applications and other correspondence as required by the West Virginia Department of Environmental Protection, Chapter 22 of the Code of West Virginia and the legislative rules and regulations promulgated thereunder.

- John Principe, Director
- Gayle Fratto, Assistant Director
- John Hando, Risk Assessment Emergency Response Coordinator
- Joyce Addison, Manager Hazardous Materials
- Brian Lemme, Environmental Health and Safety Specialist
- Paul Porter, Hazardous Materials Specialist

If you have any questions or comments, please contact Brian Lemme at (304) 293-8742 or e-mail [Brian.Lemme@mail.wvu.edu](mailto:Brian.Lemme@mail.wvu.edu).

Sincerely,



Narvel G. Weese, Jr.  
Vice President for Administration and Finance

XC: File



**National Pollutant Discharge Elimination System (NPDES)**

**Storm Water Management Program**

**Site Registration Form**

**for**

**West Virginia**

**Municipal Separate Storm Sewer Systems (MS4s)**

**General Permit WV0116025**

The site registration application (SRA) is for local governments or other regulated entities to submit the required information necessary for their Stormwater Management Program (SWMP) for compliance under the National Pollutant Discharge Elimination System (NPDES) MS4 General Permit to discharge stormwater runoff from a small municipal separate storm sewer system (MS4).

An authorized signature as required by 47CSR10 is needed to complete the application. All information should be included on this form or if needed, additional information can be attached at the end of the SRA.

**Two (2) copies** of the site registration application form shall be mailed to the address below.

**West Virginia Department of Environmental Protection  
Division of Water and Waste Management – MS4 Program  
601 57<sup>th</sup> Street, SE  
Charleston, WV 25304**

## Section I. General Information

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### MS4 Operator

Part II A.

- 1.a. Name of City, County or other public entity that operates a small MS4:  
West Virginia University (WVU)
- 1.b. Mailing Address:  
975 Rawley Lane, P.O. Box 6551, Morgantown, WV 26506

Local staff contact, person responsible for overall program implementation and coordination. (This is the person DEP will contact as the need arises for more information and/or details about your stormwater management program or general questions concerning stormwater in your community.)

- 1.c. Name Brian M. Lemme
- 1.d. Title Stormwater Specialist, Environmental Health and Safety  
975 Rawley Lane, P.O. Box 6551, Morgantown, WV 26506
- 1.e. Phone (304) 293-8742
- 1.f. E-mail address Brian.Lemme@mail.wvu.edu

- 1.c. Name Gayle Fratto
- 1.d. Title Assistant Director, Environmental Health and Safety  
975 Rawley Lane, P.O. Box 6551, Morgantown, WV 26506
- 1.e. Phone (304) 293-7396
- 1.f. E-mail address Gayle.Fratto@mail.wvu.edu

### Certification

47CSR10

By completing and submitting this application, I have reviewed and understand and agree to the terms and conditions of #WV0116025 small MS4 General Permit issued on July 11, 2014. I understand that provisions of the MS4 general permit are enforceable by law. Violations of any term and condition of the general permit and/or other applicable law or regulations can lead to enforcement action.

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 persons 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.

2.a. Authorized signature   
(Mayor or Principle Executive Officer)

2.b. Print name Brian M. Lemme

2.c. Title Environmental Health and Safety Specialist, Stormwater Specialist

2.d. Date 10-15-2015

Co-permittees (Complete this section if co-permitting with another MS4 entity)  
Part III.A.

- 3.a. Name of MS4 Operator Not applicable
- 3.b. Contact person
- 3.c. Telephone
- 3.d. Address
- 3.e. Email address
- 3.f. Have legal agreements been finalized between co-permittees?
- 3.g. If yes, provide agreement with this application. (With signatures)

**Section II. Storm Sewer System**

Description of storm sewer system

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- 4.a. Area (in acres) that drains into the MS4 from outside the corporate or jurisdictional boundaries: Approximately 320 acres (Popenoe Run) Drainage area  
Approximately 175 acres (Falling Run) Drainage
- 4.b. Area (in acres) within current corporate or jurisdictional boundaries: 1,938.97  
In the Morgantown area, WVU owns and operates the storm sewer system at 12 locations. Except for the Animal Sciences Farm, all 12 areas lie entirely within the Urbanized Area as defined by the U.S. Census Bureau. The Animal Science Farm lies partly in the Urbanized Area, but is fully included in this permit.

- Downtown Campus: 127.54 acres
- Evansdale Campus (including Core Arboretum): 322.27 acres:
- Health Sciences Center Campus (including property leased to WVUH): 225.14 acres
- Animal Sciences Farm: 565.18 acres
- Wolfe Property: 130.28 acres
- Plant Sciences Farm (Agronomy Farm): 185.86 acres
- Organic Farm: 145.87
- Motor pool: 20.22 acres
- Morgantown Airport Facility: 8.89 acres (Leased Property)
- Research Park: 97.31 acres
- Van Voorhis Property: 34.74 acres
- WVU Tech: 11 acres
- WVU Beckley: 30 acres
- Total MS4 jurisdictional acreage: 1,938.97 acres

- 4.c. For all MS4s, population (using the most recent U.S. Census data) for area served: (Universities: give current enrollment plus staff and faculty. Transportation agencies: give population of your MS4 in urbanized areas. Prisons; give current inmate plus staff population.)

Current enrollment: 30,436  
Staff: 3,432  
Faculty: 3,299  
Graduate assistants: 1,707

Total MS4 population: 38,874

Part IV.A.1.

- 4.d. Latitude and Longitude of representative outfall:  
Longitude- Degrees: 39 Minutes: 38 Seconds: 58.506  
Latitude- Degrees: -79 Minutes: 58 Seconds: 16.292

Tip: The MS4 general permit requires that you sample from one representative outfall twice a year. The location of this outfall will be in your most densely populated area.

Part IV.A.1.

- 4.e. Describe the physical location of your representative outfall. If a street address is not possible use cross street descriptions.

The representative outfall is located on the Evansdale Campus near the College of Physical Activity and Sports Science (CPASS) parking lot entrance where runoff discharges from a 48 inch storm pipe into Popenoe Run.

Part IV.A.1.

- 4.f. Describe your monitoring plan to include the frequency and parameters. WVU will comply with the stormwater monitoring standards described in Part IV.A.1.o of WVDEP General NPDES Water Pollution Control Permit WV0116025. WVU will monitor the outfall designated above once every six months. Samples will be collected from a discharge resulting from a storm event that is greater than 0.1 inches in magnitude and that occurs at least 72 hours from the previous measureable storm event (greater than 0.1 in rainfall). Samples for each six month period will be collected at least three months apart. Samples will be taken during the first thirty minutes of the discharge, but no more than sixty minutes from the start of a discharge. WVU will monitor for the following parameters:

Parameter	EPA Method No.	Method Detection Limit (mg/l)
Total Kjeldahl Nitrogen	351.2	0.03
Nitrate Nitrogen	300.0	0.002
Nitrite Nitrogen	300.0	0.004
Total Phosphorus	365.4	0.01

Total Nitrogen and total Phosphorus values will be reported on the Discharge Monitoring Report (DMRs). Total Nitrogen will be the sum of the following parameters; Total Kjeldahl Nitrogen, Nitrate, and Nitrite. If all three constituents of total nitrogen are not detected at its method detection limit (MDL), WVU will sum the actual MDLs for each constituent and report the result as less than the calculation. When calculating the sum of the constituents for total nitrogen, WVU will use actual analytical results when these results are greater than or equal to the MDL for a particular constituent and use zero for a constituent if one or two of the constituents are less than the MDL. The methods and detection levels in the table above will be used unless WVU desires to use an Environmental Protection Agency (EPA)-approved method with a detection level equal to or lower than those specified above.

### **Storm Sewer Infrastructure**

Provide the most accurate number possible.

WVU has completed mapping of the storm sewer system. The storm and sanitary systems maps are continually reviewed and updated as new buildings are constructed or improvements are made. The map is currently up to date.

5.a. Storm sewers, in feet	115,743
5.b. Open ditches, in feet	9,767
5.c. Outfalls	78
5.d.1 Drop Inlets	1091
5.d.2 Manholes	265
5.e. Detention* Facilities: 28	(Rec. Center, UGD), (Art Museum, UGD), (Downtown Chiller, UGD), (Silver Lot, UGD), (University Place, UGD), (University Place Parking Garage, UGD), (Oglebay Hall, UGD), (Life Sciences, UGD), (College Park, UGD), (Lot 72, UGD), (Lot 6, UGD), (Suncrest Center, UGD), (WVUH Facilities, UGD), (Lincoln Hall, UGD), (Honors Hall, UGD), (Lot 80&84, UGD), (BMRF, UGD), (HSC-HC, UGD), (Brooks Hall, UGD), University Middle School, UGD), (Lot 81, SDP), (Road&Grounds, SDP), (Lot 201, SDP), (Lot 200, SDP), (Lot 5, SDP), (Vandalia, SDP), (Stadium, SDP), Rec. Center Ponds, SDP)
5.f. Retention** Facilities: 8	(Downtown Library, RG), (Lot 4, RG), (Evansdale Crossing, RG), (Lot 101, RG), (ST-Lot 15, RG)
5.g. Treatment facilities: 34 (extended infiltration)	(Lot 6, BC), (Law Center, BC), (CPASS, BC), (AERB, BC), (University Park, BC), (University Place, BC), (Hydrogen Station, BC), (Agricultural Science, BC), (CAC, BC), (Evansdale Crossing, BC), (University Place Townhomes, BC), (Lot 81, BS), (Art Museum, BS), (AERB, BS), (CPASS, BS), (Evansdale Crossing, BS), (Law Center, GR), (Brooks Hall, GR)
5.h. Regional Stormwater Facilities: 1	(Erickson Alumni Center, SDP)

**(BC) Bioretention Cell, (BS) Bioretention Swale, (RG) Rain Garden, (SDP) Stormwater Detention Pond, (SRP) Stormwater Retention Pond, (UGD) Underground Detention, (GR) Green Roof**

*What's the difference between Detention and Retention?*

\*DETENTION- short-term storage of stormwater.

The objective of a detention facility is to regulate the runoff from a given rainfall event and to control discharge rates to reduce the impact on downstream stormwater systems.

\*\*RETENTION– permanent storing of stormwater indefinitely.

Water is stored until it is lost through percolation, taken in by plants, or through evaporation. Retention systems do not have any discharge of stormwater and associated pollutants.

6.a. Does your MS4 receive stormwater discharges from WVDOT storm sewer system, roads or right-of-ways?

Yes. WV 705, US 19, US 119

6.b. Does your MS4 discharge into WVDOT storm sewer systems or right-of-ways?

Yes. WV 705, US 19, US 119

7. Is your MS4 interconnected with another MS4? (Does stormwater flow into or out of your storm sewer system to or from another MS4?) If yes, describe.

Yes. The WVU MS4 is adjacent to the following MS4s: Town of Star City, City of Morgantown, City of Westover, West Virginia (WV) Division of Highways (DOH).

WVU property lies adjacent and downslope to the City of Westover. Stormwater flows from the City of Westover onto and through WVU land and storm sewer system prior to discharging to the Monongahela River. No stormwater flows from WVU to the City of Westover's MS4. The Town of Star City lies adjacent and down slope of WVU property. Stormwater flows from WVU onto and through the Town of Star City land and storm sewer system prior to discharging to the Monongahela River or Popenoe Run. In the other two jurisdictions (City of Morgantown and WVDOT), stormwater flows across MS4 boundaries from WVU to adjacent entities, and vice versa.

8. Does your municipality contain combined sewer systems?

No, WVU does not own or operate a combined sewer system. Morgantown Utility Board (MUB) owns and operates a combined sewer system located in Morgantown, WV.

9.a. What percentage is drained by Combined Sewer System?

Approximately 72% of the Downtown Campus discharges to the storm sewer system owned by MUB. WVU is unaware if this ultimately discharges to a receiving stream or connects to a combined sanitary sewer system.

9.b. What percentage is drained by separate storm sewer system?

Approximately 27% of the Downtown Campus, which is owned, operated and controlled by WVU, discharges directly to the Monongahela River.

Industrial Facilities owned by the MS4 entity

Part II.C.7.f.16

10.a. Does your MS4 own and/or operate an industrial facility that discharges stormwater into the MS4?

Yes.

Tip: These types of facilities include vehicle maintenance garages, vehicle washing or fueling areas, parks and recreational facilities that may store chemicals, pesticides and/or fertilizers, salt storage facility, waste transfer facility, wastewater treatment plants and any other industrial facility. Please note, additional information about your facilities must be provided under Minimum Control Measure #6.

10.b. If yes, how many?

Five. A discussion of these facilities is included in SRA §20.j and Table 6.2 of this application.

(Item 11 is intentionally empty)

**Map Requirements**

Please provide a legible map that identifies the following information:

Appendix A includes a map(s) with all pertinent and currently available information requested below. As a non-municipal MS4, the associated map(s) focuses on WVU's Morgantown area.

- 12.a. City, County or jurisdiction boundaries. The WVU jurisdictional boundaries are provided.
- 12.b. State or Federal operated vocational/college/university campuses and military institutions. No additional WVU campuses or military institutions exist within the extent of the map provided.
- 12.c. Urban area as defined by the 2000 Census, use 2010 Census data if available. The Urban area, as defined by the 2000 Census, is provided on the Location Map inset.
- 12.d. Municipal, County, or State wastewater treatment plants and their associated outfalls. Not applicable.
- 12.e. Landfills. Not applicable.
- 12.f. Municipal, County or State operated vehicle or fleet maintenance garages. WVU vehicle and fleet maintenance garages are provided. These are shown on the map with the number corresponding to their more detailed description in Table 6.2 of this SRA (2. Campus Support Services; 3. Facilities Management; 4. Transportation Services; 7. PRT-Engineering maintenance; 8. PRT-Main maintenance; 9. WVU Tech; 10. WVU Beckley).



- 12.g. Any other Municipal, County or State operated industrial activities, these could include; salt storage areas, parks and recreational areas, chemical storage areas, etc. In addition to the three facilities listed in §12.f, Table 6.2 includes two more facilities that operate industrial activities. These are shown on the map with the number corresponding to their more detailed description in Table 6.2 of this SRA (1. Animal Science Farm; 5. Zone Shop; 6. Downtown Facilities Support).
- 12.h. Arterial, Municipal, or State roads. Provided.
- 12.i. Stormwater discharge points and receiving streams. Provided.
- 12.j. Streams and waterways within the MS4. Provided.
- 12.k. Delineation of watershed area that drains into your MS4. Provided

Part.II.C.7.c.8.

12.l. Submit paper maps folded to 8.5” x 11”. See Appendix A.

Part.II.C.7.c.8.

12.m. Multiple maps must be of the same scale, 1:1000 or 1:2000.

**Receiving Streams and Impaired Waterbodies/TMDLs**

Part III.D.

List all named receiving waters within your MS4 jurisdiction. Indicate those identified as impaired pursuant to Clean Water Act Section 303(d). For a listing of West Virginia’s impaired water bodies and the source of impairment please use WVDEP’s most recent 303d list found at this website: [http://www.dep.wv.gov/WWE/watershed/IR/Pages/303d\\_305b.aspx](http://www.dep.wv.gov/WWE/watershed/IR/Pages/303d_305b.aspx)

Part III.D.1.

13. Locations & Pollutants of Concern

<b>Name of receiving stream</b>	<b>303(d) List? Yes or No</b>	<b>Parameters of impairment</b>	<b>Has a TMDL been established? Yes or No</b>
Deckers Creek	No		Yes – CNA-Biological (surrogate), DO, Iron, Fecal Coliform (Manganese, pH)
Falling Run	No		Yes- Fecal Coliform
Hartman Run	Yes	CNA-Biological	Yes – Fecal Coliform, Iron, (pH), (Aluminum tot)
Monongahela River	Yes	Fecal Coliform	Yes – (Aluminum tot)
Popenoe Run	No		Yes- Chloride, Fecal Coliform
West Run	Yes	CNA-Biological	Yes – Aluminum (d), Fecal Coliform, Iron, pH
Burroughs Run	No		No

Please add additional pages if needed to list your Receiving Waterbodies and any impairments.

## **\*\*IMPORTANT\*\***

MS4s that discharge into a receiving water which has been listed on the West Virginia Section 303(d) list of impaired waters, and with discharges that contain the pollutant(s) for which the water body is impaired, ***must document in the SWMP how the BMPs will control the discharge of the pollutant(s) of concern.*** They must demonstrate that there will be no increase of the pollutants of concern. As you work your way through, describing the various practices, consider how that BMP will address or control the pollutant of concern.

If your MS4 discharges into a water body with an approved TMDL, and that TMDL contains requirements for control of pollutants from the MS4 stormwater discharges, then your SWMP must include BMPs ***specifically targeted to achieve the wasteload allocations prescribed by the TMDL.*** A monitoring component to assess the effectiveness of the BMPs in achieving the wasteload allocations must also be included in the SWMP. Monitoring shall be specific for the pollutants of concern and be of sufficient frequency to determine if the stormwater BMPs are adequate to meet wasteload allocations. Monitoring can entail a number of activities including but not limited to: outfall monitoring, in-stream monitoring, and/or modeling.

- 14.a. List and quantify the BMPs you plan to implement to address each impairment. For each BMP describe how it is expected to control the pollutant of concern.

As listed in the table above, WVU drains to 3 main watersheds (Upper Monongahela River, Deckers Creek, and Upper Monongahela River). Within these 3 watersheds, WVU drains to 7 receiving streams comprised of smaller drainage areas. TMDLs addressing Aluminum, Chlorides, CNA-Biological, Fecal Coliform, Iron, Dissolved Oxygen (DO), pH, and Manganese are written for six of these. This SWMP will focus on addressing three of these pollutants, (Chlorides, Fecal Coliform, and Iron) for two reasons. First, the streams are not impaired from these pollutants based on the (2014 Draft 303(d) list, p.37-38), but TMDLs have been developed and WVU is a potential contributor to these pollutants. Second, the additional pollutants (Aluminum, CNA-Biological, DO, pH, and Manganese are not related to stormwater runoff, but other sources such as Acid Mine Drainage (AMD) from abandoned mine lands and/or other regulated point source discharges.

Hartman Run, West Run and the Monongahela River are the only water bodies to which WVU drains that are listed on the 303(d) list. Hartman Run and West Run are impaired for CNA-Biological and the Monongahela River is impaired for Fecal Coliform.

Stormwater is a potential source of Fecal Coliform and Chloride pollution from landscaped areas and impervious surfaces. Runoff from construction site can contribute to Iron pollution. As runoff from all of the WVU property ultimately drains to the Monongahela, WVU will implement BMPs that will control discharge of Fecal Coliform where elevated levels of the source pollutant are observed from runoff associated with WVU property. WVU will also implement BMPs targeted at controlling chlorides where elevated levels of the source pollutant are observed from runoff associated with WVU property for Popenoe Run. BMPs for construction activities will be implemented to control sediment runoff, which has the potential for Iron.

A preliminary assessment reveals that the potential sources of Fecal Coliform pollution could be from; pet waste, manure management, wildlife (deer, ducks, etc), leaking sanitary sewers or illegal cross connections, and combined sewer overflows (CSOs). This SWMP addresses these potential sources of Fecal Coliform in the following ways:

- Education and Outreach (BMP 1-1). Information on the above topics will be provided for eliminating or reducing sources of Fecal Coliform.
- Education and Outreach (BMP 3-2). Information on reporting hazards associated with an illicit discharge or other impacts related to sanitary sewer issues.

A preliminary assessment reveals that the potential sources of Chloride pollution could be from: deicing roadways, parking areas, sidewalks and other surfaces. Deicing policies will be developed for application rates and use of hard rock salt or a liquid salt brine solution.

- Education and Outreach (BMP 1-1) (BMP 6-1). Information on the above topics will be provided for eliminating or reducing sources of Chlorides.

A preliminary assessment reveals that the potential sources of Iron pollution could be from sediment-laden runoff from construction activities.

- Education and Outreach (BMP 4-1). Information on Erosion and Sediment (E&S) controls and the impacts from sediment transporting pollutants.

A preliminary assessment reveals that the potential sources of chemicals that could affect pH and Dissolved Oxygen (DO) could be from cooling towers.

- Education and Outreach (BMP 1-1). Information on the above topic will be provided for eliminating or reducing sources of chemicals affecting pH and DO.

Tip: BMPs for Fecal Coliform might include a robust pet waste program; sewer line inspections and repair; procedures for identifying and repairing failing septic tanks.

Your plan needs to be quantifiable. For example: how many sewer line inspections do you plan to conduct each year? How many and of what sort of outreach campaigns to the community about pet waste do you plan to conduct, etc.?

- 14.b. Describe your monitoring plan for impaired waterbodies and those with TMDLs. Give locations and frequencies.

Appendix B includes a map(s) with all pertinent and currently available information requested above. The impaired waterbodies are: Hartman Run, West Run and the Monongahela River. WVU does not possess the proper equipment to conduct background sampling of the Monongahela River to determine if a reduction in the impaired parameter Fecal Coliform is being achieved. WVU will focus on TMDLs established for the impaired streams listed above as well as Deckers Creek, Falling Run and Popenoe Run.

**HARTMAN RUN:** WVU will collect samples for Fecal Coliform and Iron from the upper most locations where WVU property discharges into an UT/Hartman Run or Hartman Run. Samples for Fecal Coliform and Iron will also be collected from within Hartman Run prior to flowing into Deckers Creek.

**DECKERS CREEK:** WVU will collect samples for Fecal Coliform and Iron from an outfall at the College Park property prior to entering the MUB storm sewer system. Samples for Fecal Coliform and Iron will also be collected from within Deckers Creek prior to flowing into the Monongahela River.

**FALLING RUN:** WVU will collect samples for Fecal Coliform from three locations within Falling Run; upper most area near WVU property below the Organic Farm, a middle location prior to the stream entering the box culvert, and a lower point from within a control structure prior to the flow being directed to the MUB Star City WWTP.

**POPENOE RUN:** WVU will collect samples Fecal Coliform and Chlorides from three locations within Popenoe Run; upper most area near Stewartstown Road outside of WVU property, a middle location prior to existing the WVU Alumni stormwater ponds, and a lower point from within Popenoe Run prior to flowing into the Monongahela River.

**WEST RUN:** WVU will collect samples for Fecal Coliform and Iron from four locations within West Run; upper most area near I-68 outside of WVU property, a middle location from an UT on WVU property, another middle location within the stream below all UTs of the Animal Science Farm, and a lower point from within West Run prior to combining with Burroughs Run.

The approximate locations of samples points can be viewed on the attached map. Within the first 24 months from approval of the SWMP, WVU will collect two rounds of samples from the identified locations to establish baseline data. These samples will be collected around the winter and summer seasons. After results have been reviewed and possible problematic areas identified a more detailed sampling plan will be established to focus on the source of pollution and a plan of action for reduction or elimination of pollutants in that area.

- 14.c. If visual documentation of removal of pollutant sources, is a component of your plan please describe fully. For example, do you plan to use before and after photos?

WVU will conduct visual inspections of identified locations with the need to reduce the discharge of pollutants of concern into the identified receiving streams. Documentation of these inspections will be performed with, but not limited to written inspections forms, field notes, before and after photos. WVU will also performed task outlined in Table 3.1 for the Illicit Discharge Detection and Elimination Program in regards to documenting pollutant source removal.

Evaluating the effectiveness of your SWMP for impaired waterbodies/TMDLs

- 14.d. Explain how your approach is expected to achieve wasteload allocations for waterbodies with established TMDLs. Discuss flow monitoring, outfall monitoring, in-stream monitoring, modeling, and/or other methodology to evaluate effectiveness.

WVU's monitoring plan listed above will create and cast a broad net over general drainage areas to start. After initial in-stream, outfall, or specific runoff sampling is conducted, WVU will categorizes specific properties that appear to contribute to pollutant wasteloads. Once problematic areas are identified a more detailed plan of action will be developed to reduce wasteload allocations using specific BMPs.

- 14.e. Explain how will you determine if your SWMP and mix of BMP's need to be modified to meet wasteload allocations?

WVU's approach to start on a large scale model and shift more towards a specific use of specialized BMPs, field inspections, sampling, and training will allow WVU to document and track certain trends towards achieving wasteload allocations for waterbodies with established TMDLs.

You are required to evaluate the effectiveness of your stormwater management program and your chosen BMP's. There are a variety of ways to do this. By identifying appropriate evaluation methods early, you then have a road map that will guide overall program implementation and BMP implementation. For example, you might analyze all your monitoring data, assess how aggressively your chosen BMPs were used, and describe any reductions in the pollutant of concern.