west virginia department of environmental protection

Division of Water and Waste Management
601 57th Street, SE
Charleston, WV 25304
Phone: 304-926-0495 / Fax: 304-926-0463

Harold D. Ward, Cabinet Secretary
dep.wv.gov

MEMORANDUM

To: Water Development Authority
Meredith J. Vance, Director, Environmental Engineering Division, BPH

From: Katheryn Emery, P.E., Program Manager
Sewer Technical Review Committee

Date: July 21, 2026

Subject: Greenbrier County PSD #2
IJDC Application - 2026W-2791
Alternate Raw Water Source

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1. This committee has reviewed the preliminary application and engineering report submitted for the above referenced project in accordance with Chapter 31, Article 15A. It has been determined that the proposed project is:

   a. √ Consistent with the intent of the Infrastructure and Jobs Development Act and is the most cost-effective, environmentally sound alternative for solving the water needs in this area.

   b. __ Not consistent with the Act and may not be the most cost effective, environmentally sound alternative for solving the wastewater needs in this area.

   c. __ Same as (a) above except that certain issues need to be addressed prior to design and construction as the attached comments indicate.

2. Our recommendation is that:

   a. √ The Funding Committee needs to review the proposed sources of funding to determine the best mix of grant and/or loan funds in accordance with applicable guidelines.

   b. __ The Funding Committee should recommend that the Council approve the proposed project and its funding plan.

c. ___ The Funding Committee does not need to review the funding assumptions on this project because of deficiencies in the engineering report. The proposed project should be tabled for the consultant to address technical comments.

d. ___ This project should be referred to the Consolidation Committee.

3. Other remarks:

The proposed project intends to add an additional raw water source from a local abandoned mine that produces high quality raw water to serve as an alternate source. This source will be an additional source of water, and serve as a backup, the additional flow will supplement low flows during the summer months. The project will also include upgrades to the WTP to provide improved metals removal.

The proposed total cost for this project is $5,420,000.00 and the District intends to pursue a $1,500,000 DWTRF Loan 0.0% interest, 40-year, 0.25% admin fee), $1,500,000 DWTRF principal forgiveness, $1,000,000 IJDC grant, and a $1,420,000 AMLER grant.

DWTRF does not offer a 0%, 40-year loan. The project will qualify for a 0.25%, 0.25% admin. fee, 40-year loan. In addition, if the project does not submit an approvable BCL request by June 30, 2027, it will only be eligible for $1,000,000 in principle forgiveness.

The provided 5G documentation is from 2013 and does not appear to reference any water treatment plant or raw water source project scope. This will need to be addressed prior to receiving a commitment of funds.

The project is not eligible for AML funding but appears eligible to apply for AMLER funding.

The project will need to seek a Total Engineering Fee waiver.

<u>Preliminary Project Ratings:</u>

Public Health Benefits: 5
Compliance with Standards: 5

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Harold D. Ward, Cabinet Secretary
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MEMORANDUM

TO: Katheryn Emery, P.E., Program Manager, DWWM

FROM: Justin Moffitt, P.E., Engineer Associate, DWWM

DATE: July 10, 2026

SUBJECT: Greenbrier County PSD #2
IJDC Application - 2026W-2791
Alternate Raw Water Source

RECOMMENDATION

The IJDC Application and Preliminary Engineering Report (PER) prepared by The Thrasher Group, Inc. for the above referenced project have been reviewed and are technically feasible.

PROJECT DESCRIPTION

The Greenbrier County Public Service District #2 (District), located in Greenbrier County, owns and operates a Class B water utility and is permitted to operate under Public Water System Identification (PWSID) # WV3301302. The District serves 632 residential customers and 25 commercial customers through a distribution system consisting of 79 miles of line, 125 fire hydrants, 127 gate valves, three (3) storage tanks with a combined capacity of 433,000 gallons, one (1) booster station, three (3) pressure reducing valves (PRVs) and all necessary appurtenances. The plant currently utilizes three (3) abandoned mine sources from the Upper Mine and New Mine areas, as well as a main backup well in Leslie. There are two wells at the water plant, but are not often used, as one produces water with excess iron and the other has been non-functional since the water plant was upgraded in 2017.

The proposed project intends to add an additional raw water source from a local abandoned mine in the Leslie (Nelson) Draining Portals (AML Pad Number WV005167) area that produces high quality raw water to serve as an alternate source. Raw water would be collected in a concrete wetwell, then flow by gravity through approximately 10,000 linear feet of 6-inch C900 PVC DR-18 pipe to the existing WTP by following existing rights-of-way. This source will be an additional source of water, and serve as a backup, the additional flow shall be adequate to bolster the flow of raw water to the plant. The project will also include a 250,000-gallon water settling basin, chemical feed equipment, a booster pump station and the replacement of the filter media. This additional equipment will provide improved metals removal.

The proposed total cost for this project is $5,420,000.00 and the District intends to pursue a $1,500,000 DWTRF Loan 0.0% interest, 40-year, 0.25% admin fee), $1,500,000 DWTRF principal forgiveness, $1,000,000 IJDC grant, and $1,420,000 AMLER grant. Conflicting data was given on monthly rates and MHI% but in either scenario MHI% is above 2.0%.

NEED FOR PROJECT

The need for this project stems from the area experiencing limited water in the late summer and fall, paired with recent extensions and proposed extensions, as the demand for water has already increased. Consequently, an alternate water source must be implemented to allow the plant to meet the demand, particularly in the dry season.

DEFICIENCIES/COMMENTS

- Two wells are referenced at the WTP site, one has high iron and the other is not functional. Evaluate putting non-functional well back in service as an alternative.
- Three wells are referenced as available for use as raw water sources with a total flow of 400 gpm. This is the capacity of the plant and can meet proposed future demand in 4 hours. This would seem an adequate source of water for backup. Clarify the need for further water supply.
- Funding scenario has listed a 40-year DW SRF Loan at 0.0% interest.
- AML funding rejected due to ineligible requests.
- MHI and monthly rates are different on preliminary application and PER.
- Using the Combined Application, the Design fees appear to be under, and Total Engineering fees appear to be significantly above the ASCE curve.

Preliminary Project Ratings:
Public Health Benefits: 5
Compliance with Standards: 5

Public Service Commission
of West Virginia

201 Brooks Street, P.O. Box 812
Charleston, West Virginia 25323

Phone: (304) 340-0300
Fax: (304) 340-0325

July 15, 2026

Katheryn Emery, P.E., Program Manager
CWSRF & DWTRF, Division of Water and Waste Management, WVDEP
Meredith Vance, Director
Environmental Engineering Division, WVBPH

Re: Public Service Commission Staff Review Comments
Application No. 2026W-2791
Greenbrier PSD #2 – Alternate Raw Water Source
& Water Treatment Plant Improvements
Infrastructure Preliminary Application

As requested, the Technical Staff of the Public Service Commission of West Virginia has completed its review of the above-referenced Infrastructure application. In light of Technical Staff's comments enclosed herewith, we are recommending the application be:

__X__ Forwarded to the Funding Committee

_____ Forwarded to the Consolidation Committee

_____ Returned to the Applicant

Please advise if you have any questions.

Sincerely,

Brandon Crace

Brandon Crace
Engineering Division

Enclosures

PUBLIC SERVICE COMMISSION STAFF
TECHNICAL REVIEW

DATE:	July 15, 2026
PROJECT SPONSOR:	**GREENBRIER COUNTY PUBLIC SERVICE DISTRICT #2 – (WATER)**
PROJECT SUMMARY:	The Greenbrier County PSD #2 is proposing to construct a 250,000-gallon raw water settling basin, replace existing filter media, and construct a new raw water source at an abandoned underground mine.

PROPOSED FUNDING:

DWTRF Principal Forgiveness	$1,500,000
DWTRF Loan (0%, .25% AF, 40 yrs.)	1,500,000
IJDC Grant	1,000,000
AML Grant	1,420,000
Total	$ 5,420,000

CURRENT RATES:

$79.17	3,400 gallons
$92.31	4,000 gallons

PROPOSED RATES:

$83.69	3,400 gallons
$97.57	4,000 gallons

Application No.2026W-2791

RECOMMENDATION:
__X__ Forward to the Funding Committee
____ Forward to the Consolidation Committee
____ Return to the Applicant

FINANCIAL: Nathan Nelson

1. Current rates ($79.17 for 3,400 gallons) are above the rates attributable to 1.25% ($42.98), 1.5% ($51.58), 1.75% ($60.17) and 2.0% ($68.77) of the Median Household Income.

2. Using Scenario 1, the preferred funding package consisting of DWTRF Principal Forgiveness of $1,500,000, a DWTRF Loan of $1,500,000 at 0%, with a .25% Administrative Fee, for 40 years (paid back over 38 years), an IJDC Grant of $1,000,000, and an AML Grant of $1,420,000, proposed rates

($83.69 for 3,400 gallons) will provide a cash flow surplus of $20,126 and debt service coverage of 136.77%.

3. Using the Scenario 2 alternate loan package of $5,420,000 (in uncommitted funds) at 5% for 40 years (paid back over 38 years), proposed rates ($111.42 for 3,400 gallons) will provide a cash flow surplus of $15,847 and debt service coverage of 125.64%.

4. Notes to Comments:

   A. Staff's detailed adjustments are listed on Attachment A for Scenario 1 (Preferred Funding Package) and Attachment B for Scenario 2 (Loan Package).

   B. Staff prepared the attached Cash Flow Analysis utilizing information from the Annual Report for the Fiscal Year Ended June 30, 2025, and the applicant's Rule 42 Exhibit submitted with the application.

   C. Staff notes the Applicant's cash flow analyses include going level rates of $77.38 (for 3,400 gallons). However, these rates are the approved Step 2 rates that are effective upon substantial completion of a project under construction to serve 200 new customers and are not yet in effect. Thus, the District's current rates of $79.17 (for 3,400 gallons), are the Step 1 rates approved in Case No. 25-0556-PWD-19A and effective for all service rendered on and after January 5, 2026. The Step 2 rates $77.38 (for 3,400 gallons) are slightly lower than the current Step 1 rates and the Applicant's cash flow analysis does not take the current Step 1 rates into account, but rather reflects the Step 2 rates at going level. Staff's analysis reflects the revenue adjustments for both the Step 1 and Step 2 rates.

   D. Staff has included a Scenario 3 analysis. Staff notes that the project sponsor is proposing a DWTRF Loan at 0% interest, .25% Administrative fee, for 40 years. Staff has confirmed that there are no DWTRF loans available at 0% interest. The District would be eligible for a DWTRF loan of .25% interest, .25% Administrative Fee, for 40 years (paid back over 38 years), for the preferred funding package. If the preferred funding package is adjusted for this change, proposed target rates ($83.69 for 3,400 gallons) would provide a cash flow surplus of $17,977 and debt service coverage of 136.04%.

E. Senate Bill 234, effective June 12, 2015, required water and sewer utilities that are political subdivisions of the state to maintain a cash working capital reserve in an amount of no less than one-eighth (1/8) of actual annual operation and maintenance expenses. It should be noted that the cash flows provided by the project sponsor include funding for the 1/8 cash working capital reserve. Staff accepted that amount in its analyses. However, this amount may be reviewed by the Commission in future filings in accordance with Public Service Commission General Order 183.11.

ENGINEERING: Brandon Crace

1. Pursuant to House Bill 2742 passed in the 2025 Legislative Session, this project will not require a Certificate of Convenience and Necessity from the PSC.

2. Scope: The Greenbrier County PSD #2 is proposing to construct a 250,000-gallon raw water settling basin, replace existing filter media, and construct a new raw water source at an abandoned underground mine. The proposed project scope includes: mobilization, pre-construction video, erosion and sediment control, 10000 LF of 6-inch PVC waterline, 600 LF of 12-inch steel casing (bore & jack), three (3) 6-inch gate valves, five (5) 1-inch combination air/vacuum valves, 150 LF of security fence, a 12-ft diameter concrete vault, 50 LF of WVDOH Type "B" Trench Repair, 50 LF of WVDOH Type "C" Trench Repair, 50 LF of gravel driveway repair, 250,000-gallon raw water settling basin, site work, site piping, chemical feed equipment, booster pump station, filter media replacement, restoration of disturbed areas, and necessary appurtenances. The estimated construction cost is $3,715,000 (includes 15.09% construction contingency), and the estimated total project cost is $5,420,000 (includes 5% project contingency).

   Need: The PER indicates that a current raw water sources contain iron and manganese, and raw water treatment would benefit from an increased detention time to facilitate oxidation and gravity settling. The PER narrates that the area has experienced limited water volumes in the late summer and fall, including the increased demand from the PSD pursuing waterline extensions, requiring an alternate water source.

Customer Density: This project is an upgrade project; therefore, customer density will remain unchanged.

Cost per Customer: Based upon the estimated total project cost is $5,420,000, and having approximately 657 customers, the cost per customer will be approximately $8,250. However, the cost per customer in terms of proposed borrowing is $2,284, as the proposed funding is 27.7% loan.

3. Project Alternatives: The PER indicates that 3 Alternatives were considered: Alternative #1 – "Do Nothing", Alternative #2 – Mine Source, and Alternative #3 – Surface Intake. The PER indicates that the PSD proposes to pursue Alternative #2.

4. Consolidation: There are no consolidation opportunities presented by this project.

5. Operation and Maintenance (O&M) Expenses: The PER did include a detailed breakdown of anticipated changes to O&M expenses. The PER indicates that O&M expenses are anticipated to increase by approximately $27,660 annually due to purchased power, chemicals, materials and supplies, and contract services.

6. Engineering Agreement: The application includes information to determine compliance with West Virginia Code §5G-1-1, *et seq*. Total technical services (engineering) costs for the project are $1,132,500, which is equal to 30.48% of the construction cost of $3,715,000 (includes 15.09% construction contingency). *This Application is requesting $300,000 in Engineering Design Fees associated with Phase I Water Rehabilitation. There has not been an Application filed at IJDC for the Phase I project.*

7. Deficiencies/Comments:
   - This Application is requesting $300,000 in Engineering Design Fees associated with the Phase I Water Rehabilitation. There has not been an Application filed at IJDC for the Phase I project. *This $300,000 is not needed or necessary to complete the proposed construction scope identified in the 2026W-2791 Application. Additionally, this additional request equates to 5.54% of the Total Project Cost and 26.5% of the Total Technical Services.*
   - The provided 5G documentation is from 2013, and does not appear to reference any water treatment plant or raw water source project scope.

- Replacement of filter media is typically considered an O&M expense.
- The PER mentions 3 existing groundwater wells that can be utilized to supplement the water supply. However, the PER indicates that “There are two wells at the water plant, but are not often used, as one produces water with excess iron and the other has been non-functional since the water plant was upgraded in 2017.” The PER <u>did not</u> include an evaluation to improve or upgrade the existing wells.
- The PER mentions 2 interconnections: 1 with the Town of Rupert, and 1 with the Town of Rainelle. The PER further mentions that elevation constraints prevent either interconnection from meeting the demand of Greenbrier PSD #2. The PER <u>did not</u> include an evaluation to improve or upgrade the interconnections.

GREENBRIER COUNTY PSD #2 - WATER
CASH FLOW ANALYSIS
YEAR ENDED: June 30, 2025
APPLICATION NO: 2026W-2791
July 15, 2026

PREFERRED FUNDING PACKAGE
SCENARIO 1

		Rule 42 Going Level Per Application Before Project	Rule 42 Proforma Per Application with Project	Staff Adjustments		Per Staff Analysis
		1	2	3		4
		$	$	$		$
AVAILABLE CASH						
Operating Revenues		847,380	916,444	(55,330)	(1)	861,114
Other Operating Revenue		16,956	25,196	-		25,196
SB 234 Annual Working Cash Collections				55,330	(2)	55,330
Interest Income & Other Misc.		13,216	13,216	-		13,216
Total Cash Available		877,552	954,856	-		954,856
OPERATING DEDUCTIONS						
Operating Expenses		413,070	442,640	46	(3)	442,686
Taxes		13,500	13,500	-		13,500
Total Cash Requirements Before Debt Service		426,570	456,140	46		456,186
Cash Available for Debt Service	(A)	450,982	498,716	(46)		498,670
DEBT SERVICE REQUIREMENTS						
Principal & Interest	(B)	325,123	362,623	1,974	(4)	364,597
Other Debt		-	-	-		-
Reserve Account @ 10%		32,512	36,262	197	(5)	36,459
Renewal & Replacement Fund (2.5%)		21,939	23,871	(1,713)	(6)	22,158
Total Debt Service Requirement		379,574	422,756	458		423,214
SB 234 Cash Working Capital		51,634	55,330	-		55,330
Remaining Cash		19,774	20,630	(504)		20,126
Percent Coverage	(A) / (B)	138.71%	137.53%			136.77%
Average rate for 3,400 gallons		$ 77.38	$ 83.69	$ -		$ 83.69
Average rate for 4,000 gallons		$ 90.22	$ 97.57	$ -		$ 97.57

GREENBRIER COUNTY PSD #2 - WATER
CASH FLOW ANALYSIS
YEAR ENDED: June 30, 2025
APPLICATION NO: 2026W-2791

Attachment A
PREFERRED FUNDING PACKAGE
SCENARIO 1

Staff Adjustments

Adjustment Description			$	Increase <Decrease>
(1)	**Operating Revenues**	**Per Staff Analysis**	**861,114**	**(55,330)**
		Per Application with Project	**916,444**	

Adjust revenues in accordance with PSC General Order 183.11.

(2)	**SB 234 Annual Working Cash Collections**	**Per Staff Analysis**	**55,330**	**55,330**
		Per Application with Project	**-**	

Account for SB 234 (2015) funding pursuant to PSC General Order 183.11.

(3)	**Operating Expenses**	**Per Staff Analysis**	**442,686**	**46**
		Per Application with Project	**442,640**	

To record the difference in Staff's calculation of the 0.25% DWTRF administrative fee.

(4)	**Principal & Interest**	**Per Staff Analysis**	**364,597**	**1,974**
		Per Application with Project	**362,623**	

The difference in P&I is related to Staff's calculation of a loan of $1,500,000 for 40 years (paid over 38 years) at 0%.

(5)	**Reserve Account @ 10%**	**Per Staff Analysis**	**36,459**	**197**
		Per Application with Project	**36,262**	

Staff assumed a 10% reserve on the new debt.

(6)	**Renewal & Replacement Fund (2.5%)**	**Per Staff Analysis**	**22,158**	**(1,713)**
		Per Application with Project	**23,871**	

Staff used 2.5% of the projection of "Operating & Other Revenues" as the basis of the renewal & replacement fund.

GREENBRIER COUNTY PSD #2 - WATER
CASH FLOW ANALYSIS
YEAR ENDED: June 30, 2025
APPLICATION NO: 2026W-2791
July 15, 2026

LOAN FUNDING PACKAGE
SCENARIO 2

		Max Rate Going Level Per Application Before Project	Max Rate Proforma Per Application with Project	Staff Adjustments		Per Staff Analysis
		1	2	3		4
		$	$	$		$
AVAILABLE CASH						
Operating Revenues		847,380	1,220,092	(55,330)	(1)	1,164,762
Other Operating Revenue		16,956	33,134	-		33,134
SB 234 Annual Working Cash Collections				55,330	(2)	55,330
Interest Income & Other Misc.		13,216	13,216	-		13,216
Total Cash Available		877,552	1,266,442	-		1,266,442
OPERATING DEDUCTIONS						
Operating Expenses		413,070	442,640	(1,910)	(3)	440,730
Taxes		13,500	13,500	-		13,500
Total Cash Requirements Before Debt Service		426,570	456,140	(1,910)		454,230
Cash Available for Debt Service	(A)	450,982	810,302	1,910		812,212
DEBT SERVICE REQUIREMENTS						
Principal & Interest	(B)	325,123	638,744	7,700	(4)	646,444
Other Debt		-	-	-		-
Reserve Account @ 10%		32,512	63,874	770	(5)	64,644
Renewal & Replacement Fund (2.5%)		21,939	31,661	(1,714)	(6)	29,947
Total Debt Service Requirement		379,574	734,279	6,756		741,035
SB 234 Cash Working Capital		51,634	55,330	-		55,330
Remaining Cash		19,774	20,693	(4,846)		15,847
Percent Coverage	(A) / (B)	138.71%	126.86%			125.64%
Average rate for 3,400 gallons		$ 77.38	$ 111.42	$ -		$ 111.42
Average rate for 4,000 gallons		$ 90.22	$ 129.91	$ -		$ 129.91

GREENBRIER COUNTY PSD #2 - WATER
CASH FLOW ANALYSIS
YEAR ENDED: June 30, 2025
APPLICATION NO: 2026W-2791

Attachment B
LOAN FUNDING PACKAGE
SCENARIO 2

Staff Adjustments

Adjustment Description			$	Increase <Decrease>
(1)	**Operating Revenues**	**Per Staff Analysis**	**1,164,762**	**(55,330)**
		Per Application with Project	**1,220,092**	
	Adjust revenues in accordance with PSC General Order 183.11.			
(2)	**SB 234 Annual Working Cash Collections**	**Per Staff Analysis**	**55,330**	**55,330**
		Per Application with Project	**-**	
	Account for SB 234 (2015) funding pursuant to PSC General Order 183.11.			
(3)	**Operating Expenses**	**Per Staff Analysis**	**440,730**	**(1,910)**
		Per Application with Project	**442,640**	
	To remove DWTRF administrative fee that will not be incurred with this scenario.			
(4)	**Principal & Interest**	**Per Staff Analysis**	**646,444**	**7,700**
		Per Application with Project	**638,744**	
	The difference in P&I is related to Staff's calculation of a loan of $5,420,000 for 40 years (paid over 38 years) at 5%.			
(5)	**Reserve Account @ 10%**	**Per Staff Analysis**	**64,644**	**770**
		Per Application with Project	**63,874**	
	Staff assumed a 10% reserve on the new debt.			
(6)	**Renewal & Replacement Fund (2.5%)**	**Per Staff Analysis**	**29,947**	**(1,714)**
		Per Application with Project	**31,661**	
	Staff used 2.5% of the projection of "Operating & Other Revenues" as the basis of the renewal & replacement fund.			

GREENBRIER COUNTY PSD #2 - WATER
CASH FLOW ANALYSIS
YEAR ENDED: June 30, 2025
APPLICATION NO: 2026W-2791
July 15, 2026

PREFERRED FUNDING PACKAGE
SCENARIO 3

		Rule 42 Going Level Per Application Before Project	Rule 42 Proforma Per Application with Project	Staff Adjustments		Per Staff Analysis
		1	2	3		4
		$	$	$		$
AVAILABLE CASH						
Operating Revenues		847,380	916,444	(55,330)	(1)	861,114
Other Operating Revenue		16,956	25,196	-		25,196
SB 234 Annual Working Cash Collections				55,330	(2)	55,330
Interest Income & Other Misc.		13,216	13,216	-		13,216
Total Cash Available		877,552	954,856	-		954,856
OPERATING DEDUCTIONS						
Operating Expenses		413,070	442,640	46	(3)	442,686
Taxes		13,500	13,500	-		13,500
Total Cash Requirements Before Debt Service		426,570	456,140	46		456,186
Cash Available for Debt Service	(A)	450,982	498,716	(46)		498,670
DEBT SERVICE REQUIREMENTS						
Principal & Interest	(B)	325,123	362,623	3,928	(4)	366,551
Other Debt		-	-	-		-
Reserve Account @ 10%		32,512	36,262	393	(5)	36,655
Renewal & Replacement Fund (2.5%)		21,939	23,871	(1,713)	(6)	22,158
Total Debt Service Requirement		379,574	422,756	2,607		425,363
SB 234 Cash Working Capital		51,634	55,330	-		55,330
Remaining Cash		19,774	20,630	(2,653)		17,977
Percent Coverage	(A) / (B)	138.71%	137.53%			136.04%
Average rate for 3,400 gallons		$ 77.38	$ 83.69	$ -		$ 83.69
Average rate for 4,000 gallons		$ 90.22	$ 97.57	$ -		$ 97.57

GREENBRIER COUNTY PSD #2 - WATER
CASH FLOW ANALYSIS
YEAR ENDED: June 30, 2025
APPLICATION NO: 2026W-2791

Attachment C
PREFERRED FUNDING PACKAGE
SCENARIO 3

Staff Adjustments

Adjustment Description		$	Increase <Decrease>
(1) **Operating Revenues**	**Per Staff Analysis**	**861,114**	**(55,330)**
	Per Application with Project	**916,444**	
Adjust revenues in accordance with PSC General Order 183.11.			
(2) **SB 234 Annual Working Cash Collections**	**Per Staff Analysis**	**55,330**	**55,330**
	Per Application with Project	**-**	
Account for SB 234 (2015) funding pursuant to PSC General Order 183.11.			
(3) **Operating Expenses**	**Per Staff Analysis**	**442,686**	**46**
	Per Application with Project	**442,640**	
To record the difference in Staff's calculation of the 0.25% DWTRF administrative fee.			
(4) **Principal & Interest**	**Per Staff Analysis**	**366,551**	**3,928**
	Per Application with Project	**362,623**	
The difference in P&I is related to Staff's calculation of a loan of $1,500,000 for 40 years (paid over 38 years) at 0.25%.			
(5) **Reserve Account @ 10%**	**Per Staff Analysis**	**36,655**	**393**
	Per Application with Project	**36,262**	
Staff assumed a 10% reserve on the new debt.			
(6) **Renewal & Replacement Fund (2.5%)**	**Per Staff Analysis**	**22,158**	**(1,713)**
	Per Application with Project	**23,871**	
Staff used 2.5% of the projection of "Operating & Other Revenues" as the basis of the renewal & replacement fund.			

west virginia department of environmental protection

Division of Water and Waste Management
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Charleston, WV 25304-2345
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Fax: 304-926-0463

Harold D. Ward, Cabinet Secretary
www.dep.wv.gov

MEMORANDUM

MEMO TO: Meredith J. Vance
Office of Environmental Health Services
Bureau for Public Health

FROM: Brian D. Bailey BB
Technical Analyst
General Permits & Support Team

DATE: June 18, 2026

SUBJECT: Infrastructure Preliminary Application for the Greenbrier Co. PSD #2 (2026W-2791): WTP Upgrades & Alternate Raw Water Source in Greenbrier County, WV.

We have reviewed the above referenced project application information. The Greenbrier Co. PSD #2 discharges its backwash to its site, which is covered under WV/NPDES Permit No. WV0040525 and expires May 10, 2028.

If the Greenbrier Co. PSD #2 is considering repairing and painting an existing water treatment plant or storage tanks, then the scope of this project requires precautions to prevent contamination of the waters of the state. Prior to beginning any removal of old paint, the Greenbrier Co. PSD #2 should contact Mr. Brad Wright or a member of his staff at (304)-926-0499, extension 49746 for guidance in determining whether the paint to be removed is considered a hazardous waste. If so, proper containment and disposal procedures must be followed for the paint and any material associated with the sand blasting. If it is determined that the paint is not hazardous, the Greenbrier Co. PSD #2 should contact John Lockhart or a member of his staff at (304)-926-0499, extension 43889 for proper disposal options.

Construction activities with a disturbed area of one (1) acre or greater are now required to register for the NPDES Storm Water Construction General Permit No. WV0115924 that became effective on April 6, 2024. Projects registered under the previous General Permit No. WV0115100 were automatically provided coverage under WV/NPDES General Permit

No. WV0115924. For more information, they may contact Larry Board at (304)-926-0499, extension 43883.

In light of the above, we have no objection to this project as long as the appropriate provisions are taken to assure compliance with Chapter 22, Article 11, of the Code of West Virginia and any associated regulations. The responsible party may contact Mylinda Maddox (304) 926-0499 ext. 43825, should additional information be required.

BDB:mam

cc: Katheryn Emery