



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: City of St. Albans
IJDC Application - 2026W-2759
Water System Improvements

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.

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- 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:

This project consists of the creation of a Geographic Information System (GIS), replacement of old, undersized, or broken waterlines, the installation of a new Dry Ridge Booster Station next to the City Park Water Storage Tank (WST), the decommission of the Vine Street WST and booster station, and replacement of aging equipment and infrastructure at the WTP.

The proposed cost for this project is \$12,968,000. The City of St. Albans will pursue a funding scenario of a \$1,000,000 DWTRF Principle Forgiveness Loan, a \$1,000,000 IJDC Grant, and a \$10,968,000 DWTRF Loan (0.5%, 40 years).

Based upon the PSC review and the rates implemented to pay for this Phase II upgrade project, it appears that the loan terms will be 0.75% interest, 0.25 administrative fee, for a term up to 30 years if an approved BCL request is received by the DWTRF prior to June 30, 2027. This is subject to change under the FY 2027 IUP and will be evaluated at the time of the BCL request.

Preliminary Project Ratings:

Public Health Benefits:	10
Compliance with Standards:	5



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MEMORANDUM

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

FROM: Spencer Fultineer, DWWM

DATE: July 13, 2026

SUBJECT: City of St. Albans
Water System Improvements
IJDC No. 2026W-2759

RECOMMENDATION

The IJDC application and Preliminary Engineering Report (PER) prepared by Chapman Technical Group for the above referenced project have been reviewed and are technically feasible.

PROJECT DESCRIPTION

The City of St. Albans owns a water treatment plant (WTP) and a distribution system under PWSID #3302031 and maintains registration under NPDES General Permit No. WVG640139. The St. Albans Municipal Utility Commission (MUC) operates this system on behalf of the City. This water system was constructed in the early 1920's. The WTP was last upgraded in 1982 and renovated in 2011. The long time service of these pipes well beyond their useful life has resulted in an increase of maintenance requirements to provide safe drinking water. This project is Phase 1 of a 3 phase plan.

This project consists of the creation of a Geographic Information System (GIS), replacement of old, undersized, or broken waterlines, the installation of a new Dry Ridge Booster Station next to the City Park WST, the decommission of the Vine Street WST and booster station, and replacement of aging equipment and infrastructure at the WTP.

The proposed cost for this project is \$12,968,000. The City of St. Albans will pursue a funding scenario of a \$1,000,000 DWTRF Principle Forgiveness Loan, a \$1,000,000 IJDC Grant, and a

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\$10,968,000 DWTRF Loan (0.5%, 40 years). The proposed monthly rate for 3,400 gallons is \$87.30 (1.94% MHI).

NEED FOR PROJECT

The City of St. Albans has a lot of aging portions of their distribution system. This makes it difficult for staff to have accurate knowledge of where and when waterlines were installed. With the use of paper maps and the retirement of knowledgeable employees, the MUC will have the Chapman Technical Group (CTG) develop a GIS to allow current and future staff to more easily locate parts of their system and maintain records of age, condition, and changes or modifications to the system.

According to the MUC's Annual report, approximately 85% of the system's watermain are cast iron (CI). CI pipes are more susceptible to scaling, corrosion, and other means of deterioration than modern DI pipes. CI is also a more brittle pipe than modern options. This project aims to replace a large quantity of CI piping as well as portions of copper and ACP with modern PVC piping. In the 2025 Annual Report, MUC pumped out 473,098,000 gallons of treated water. Approximately 224,435,000 gallons of water were sold, and approximately 124,000,000 gallons of water were lost but accounted for. This leaves an estimate unaccounted for water loss of 26.35%. This exceeds the acceptable water loss limits.

MUC recently constructed the new City Park Water Storage Tank (WST). This tank was constructed with a connection leading to the Dry Ridge WST. The Dry Ridge WST is currently being filled by water pumped over from the Vine Street WST by the Vine Street Booster Station. The hydraulics of the existing system are not currently capable of filling the Dry Ridge WST through the connection to the new City Park WST. In order to decommission the Vine street WST and Booster Station that were constructed in the 1960's, the Dry Ridge WST must be filled from the new City Park WST. This project will install a new booster station adjacent to the new City Park WST. This booster station will make it possible to fill the Dry Ridge WST and remove the old Vine Street WST and Booster Station.

The WTP operated by the MUC was constructed in the 1920's and further expanded in 1982. Outside of a renovation project in 2011, the WTP has not seen any significant improvements. The WTP has had individual pieces of equipment repaired and replaced as needed, but as the WTP continues to age, more equipment and materials will need repaired or replaced. This project will repair and replace various equipment and repair various structural items around the WTP that have deteriorated over time and are either nearing the end of their useful life or have ceased performing at acceptable levels. This project will also address the system's SCADA issue. With the software and hardware at the WTP aging and becoming outdated, the system's hardware is not capable of running newer software. In order to run the system, the computer must revert back to an old version of software. This older software is no longer receiving updates, including the necessary cybersecurity updates. In order to fix these issues, new hardware and software must be installed.

DEFICIENCIES/COMMENTS

- Using the Combined Application, the Design and Total Engineering Fees appear to be within the ASCE Design Fee Curve.
- Many service lines within the project area are classified as unknown material. The City is pursuing a lead service line inventory project to identify those unknowns.

- The City of St. Albans has requested a Loan at 0.5% for a term of 40 years, but their best available qualifying loan terms for a DWTRF Loan are based on the increased rate provided in the preliminary Application of \$87.30. The loan terms available at 1.94% MHI are 1% for a term of 21-30 years.

Preliminary Project Ratings:

Public Health Benefits	10
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



June 26, 2026

Brad Sergent, Chair

Water Development Authority, Acting Executive Director

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-2759

St. Albans, City of – Water System Improvements (Phase I)

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:

☒ 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: June 26, 2026

PROJECT SPONSOR: CITY OF ST. ALBANS – (WATER)

PROJECT SUMMARY: The City of St. Albans is proposing to pursue its Phase I water distribution system and water treatment plant improvements project.

PROPOSED FUNDING:	DWTRF Loan (.25%, .25% AF, 40 yrs.)	\$10,968,000
	IJDC Grant	1,000,000
	DWTRF Principal Forgiveness	<u>1,000,000</u>
	Total	\$12,968,000

CURRENT RATES:	\$55.50	3,400 gallons
	\$63.00	4,000 gallons

PROPOSED RATES:	\$73.52	3,400 gallons
	\$83.30	4,000 gallons

Application No. 2026W-2759

RECOMMENDATION: X Forward to the Funding Committee
 Forward to the Consolidation Committee
 Return to the Applicant

FINANCIAL: Dave Acord

1. Current rates (\$55.50 for 3,400 gallons) are above the rate attributable to 1.25% (\$53.09) of the Median Household Income (MHI), but below the rates attributable to 1.5% (\$63.71), 1.75% (\$74.33) and 2.0% (\$84.95) of the MHI. Increasing current rates to 1.5%, 1.75% and 2.0% of the MHI would provide additional revenues of \$616,821, \$1,414,476 and \$2,212,131 respectively.
2. Using Scenario 1, the preferred funding package consisting of a DWTRF Loan of \$10,968,000 at .25%, with .25% Admin. Fee, for 40 years (paid back over 38 years), an IJDC Grant in the amount of \$1,000,000, and a DWTRF Principal Forgiveness Loan of \$1,000,000, proposed rates (\$73.52 for 3,400 gallons) will provide a cash flow deficit of \$66,026 and debt service coverage of 132.10%. An additional 1.3% (for a total of \$74.48 for 3,400 gallons)

increase in proposed rates would be required to provide a cash flow surplus of \$274 and debt service coverage of 135.97%.

3. Using the Scenario 2 alternate loan package of \$12,968,000 (in uncommitted funds) at 5% for 40 years (paid back over 38 years), proposed rates (\$73.52 for 3,400 gallons) will provide a cash flow deficit of \$564,188 and debt service coverage of 105.08%. An additional 10.8% (for a total of \$81.46 for 3,400 gallons) increase in proposed rates would be required to provide a cash flow surplus of \$337 and debt service coverage of 131.11%.

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 Applicants filing includes the impact of prior, pending and subsequent projects to be undertaken. The project which is the subject of this review is identified as Phase 2 of a three-phase project and the applicable Cash Flow Analysis reflects increased rates for each project phase. The Applicant's preferred rates for this project, Phase 2, are \$73.52 for 3,400 gallons, but also includes proforma rates for Phase 3 of \$87.30 for 3,400 gallons. Staff analysis only takes into consideration the impact of Phase 2 and the preferred rates of \$73.52 for 3,400 gallons.
- D. It should be noted that the Draft Rule 42 Exhibit filed with this application is based on a DWTRF Loan in the amount of \$9,263,000 at .25%, with .25% Admin. Fee, for 40 years (paid back over 38 years). The preliminary application and Preliminary Engineering Report reflect a DWTRF Loan in the amount of \$10,968,000 at .25%, with .25% Admin. Fee, for 40 years (paid back over 38 years). Staff reflected \$10,968,000 as the basis for its analysis.
- E. Due to the various projects included in this application and discrepancies in the Max Rate Scenario cash flow analysis, provided by the project sponsor, Staff used its Scenario 1 analysis as the basis for Scenario 2. Staff then adjusted it to reflect a loan in the amount of \$12,968,000 at 5%

for 40 years (paid back over 38 years) and projected the rate necessary to provide a positive cash flow surplus and debt service coverage of at least 115%.

F. 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.

G. The City of St. Albans should carefully evaluate its revenue requirements before passing a rate ordinance in order to ensure that rates are sufficient to provide a reasonable surplus and meet coverage requirements. Staff notes that the City is a political subdivision of the state and it has at least 4,500 customers and annual gross revenues of \$3 million or more. Therefore, in accordance with Senate Bill 234, effective June 12, 2015, the Commission has no jurisdiction regarding the City's rates pursuant to WV Code 24-2-4b. However, the Commission does have jurisdiction pursuant to WV Code 24-2-1 (b)(6) for the investigation and resolution of disputes involving political subdivisions of the state regarding inter-utility agreements, rates, fees and charges, service areas and contested utility combinations.

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 City of St. Albans is proposing to pursue its Phase I water distribution system and water treatment plant improvements. The proposed project scope includes: mobilization, demobilization, pre-construction video recording, site grading and site restoration, 800 LF of 2-inch PVC waterline, 5180 LF of 6-inch PVC waterline, 7665 LF of 8-inch PVC waterline, one (1) 2-inch gate valve with box, thirty-three (33) 6-inch gate valve with box, ten (10) 8-inch gate valve with box, 670 LF of ¾-inch copper service line, 2510 LF of ¾-inch copper service line (punch), 290 LF of 12-inch steel casing, 80

LF of 16-inch steel casing, 9 fire hydrants, constant run booster pump station (complete), replace raw water flow control valve, replace raw & finished water flowmeters, improvements to outside basin (replace drives, gear boxes, & bearings), improvements to settling basin (replace troughs, plates, & scrapers), sandblast & repaint outside equipment bridges, filter wall concrete repairs (repair exterior and coat interior), replace filter media (3 filters), rebuild/replace 15 filter control valves, improvements to clearwell (drain, clean, and inspect), replace hoist & trolley for chlorine cylinders, replace chlorine emergency safety equipment, replace doors & windows at chemical building, SCADA replacement, emergency generator (complete), 26 connections to existing water mains, 131 customer service reconnections, 23 cap existing waterlines, 2 cap and abandon existing waterline, 4475 LF of asphalt restoration, 1320 LF of concrete restoration, 100 LF of road restoration, water tank demolition and disposal, booster station demolition and disposal, and necessary appurtenances. The estimated construction cost is \$10,488,000 (includes 15.0% construction contingency), and the estimated total project cost is \$12,968,000 (includes 5.23% project contingency).

Need: The PER indicates approximately 85% of the water mains consist of Cast Iron Pipe (CIP), which are possibly more than 60 years old, susceptible to scaling, corrosion, tuberculation, and are more brittle than modern Ductile Iron Pipe (DIP). This project proposes to replace waterlines that have exceeded their useful life, and has prioritized areas of replacement for this phase and future project phases.

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 \$12,968,000, and having approximately 6015 customers, the cost per customer will be approximately \$2,156. The cost per customer in terms of proposed borrowing is \$1,824, as the proposed funding is 84.58% loan.

3. Project Alternatives: The PER did include an evaluation of alternatives and selected the following alternatives: Replacement of Existing Water Lines, Demolition of Vine Street Water Storage Tank and Booster Station with New Booster Station, and Replacement and Repair of WTP Equipment and Buildings. The PER notes that these improvements will address some of the aging water mains, and make necessary improvements to its water treatment plant.

4. Consolidation: There are no consolidation opportunities presented by this project.
5. Operation and Maintenance (O&M) Expenses: The PER did include a discussion of changes to O&M expenses. The PER indicates that it is likely that any reduction in O&M expenses are expected to be nominal and insignificant.
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 \$1,886,000, which is equal to 17.98% of the construction cost of \$10,488,000 (includes 15% construction contingency).
7. Deficiencies/Comments:
 - Replacement of filter media is typically considered an O&M expense.

CITY OF ST. ALBANS - WATER
CASH FLOW ANALYSIS
YEAR ENDED: June 30, 2025
APPLICATION NO: 2026W-2759
June 26, 2026

**PREFERRED FUNDING PACKAGE
SCENARIO 1**

	Rule 42 Going Level Per Application Before Project	Phase 2 Rule 42 Proforma Per Application with Project	Staff Adjustments	Per Staff Analysis
	1	2	3	4
	\$	\$	\$	\$
AVAILABLE CASH				
Operating Revenues	4,268,980	5,357,414	(354,027) (1)	5,003,387
Other Operating Revenue	102,814	101,000	-	101,000
SB 234 Annual Working Cash Collections			422,027 (2)	422,027
Interest Income & Other Misc.	353,374	353,374	-	353,374
Total Cash Available	4,725,168	5,811,788	68,000	5,879,788
OPERATING DEDUCTIONS				
Operating Expenses	3,004,910	3,388,000	2,518 (3)	3,390,518
Taxes	89,844	98,000	-	98,000
Total Cash Requirements Before Debt Service	3,094,754	3,486,000	2,518	3,488,518
Cash Available for Debt Servi (A)	1,630,414	2,325,788	65,482	2,391,270
DEBT SERVICE REQUIREMENTS				
Principal & Interest (B)	788,438	1,583,543	175,144 (4)	1,758,687
Other Debt	-	-	-	-
Reserve Account @ 10%	-	79,510	3,162 (5)	82,672
Renewal & Replacement Fund (2.5%)	118,129	145,295	(17,685) (6)	127,610
Total Debt Service Requirement	906,567	1,808,348	160,621	1,968,969
SB 234 Cash Working Capital	375,614	422,027	-	422,027
Remaining Cash	348,233	95,413	(95,139)	274
Percent Coverage (A) / (B)	206.79%	146.87%		135.97%
Average rate for 3,400 gallons	\$ 55.50	\$ 73.52	\$ 0.96	\$ 74.48
Average rate for 4,000 gallons	\$ 63.00	\$ 83.30	\$ 1.08	\$ 84.38

**CITY OF ST. ALBANS - WATER
CASH FLOW ANALYSIS
YEAR ENDED: June 30, 2025
APPLICATION NO: 2026W-2759**

**Attachment A
PREFERRED FUNDING PACKAGE
SCENARIO 1**

Staff Adjustments

<u>Adjustment Description</u>				\$	Increase <Decrease>
(1)	Operating Revenues	Per Staff Analysis	5,003,387	(354,027)	
		Per Application with Project	5,357,414		
	Adjust revenues in accordance with PSC General Order 183.11. In addition, Staff projected that an additional \$68,000 in revenues would be needed to achieve 115% debt service coverage and a positive cash flow surplus.				
(2)	SB 234 Annual Working Cash Collections	Per Staff Analysis	422,027	422,027	
		Per Application with Project	-		
	Account for SB 234 (2015) funding pursuant to PSC General Order 183.11.				
(3)	Operating Expenses	Per Staff Analysis	3,390,518	2,518	
		Per Application with Project	3,388,000		
	Staff's calculation includes the difference in the Administrative Fee associated with the DWTRF Loan.				
(4)	Principal & Interest	Per Staff Analysis	1,758,687	175,144	
		Per Application with Project	1,583,543		
	The difference in P&I is related to Staff's calculation of a loan of \$10,968,000 for 40 years (paid back over 38 years) at .25%.				
(5)	Reserve Account @ 10%	Per Staff Analysis	82,672	3,162	
		Per Application with Project	79,510		
	Staff assumed a 10% reserve on the new debt.				
(6)	Renewal & Replacement Fund (2.5%)	Per Staff Analysis	127,610	(17,685)	
		Per Application with Project	145,295		
	Staff used 2.5% of the projection of "Operating & Other Revenues" as the basis of the renewal & replacement fund.				

CITY OF ST. ALBANS - WATER
CASH FLOW ANALYSIS
YEAR ENDED: June 30, 2025
APPLICATION NO: 2026W-2759
June 26, 2026

**LOAN PACKAGE
SCENARIO 2**

	Rule 42 Going Level Per Application Before Project	Phase 2 Rule 42 Proforma Per Application with Project	Staff Adjustments	Per Staff Analysis
	1	2	3	4
	\$	\$	\$	\$
AVAILABLE CASH				
Operating Revenues	4,268,980	5,357,414	156,973 (1)	5,514,387
Other Operating Revenue	102,814	101,000	-	101,000
SB 234 Annual Working Cash Collections			422,027 (2)	422,027
Interest Income & Other Misc.	353,374	353,374	-	353,374
Total Cash Available	4,725,168	5,811,788	579,000	6,390,788
OPERATING DEDUCTIONS				
Operating Expenses	3,004,910	3,388,000	(11,787) (3)	3,376,213
Taxes	89,844	98,000	-	98,000
Total Cash Requirements Before Debt Service	3,094,754	3,486,000	(11,787)	3,474,213
Cash Available for Debt Servi (A)	1,630,414	2,325,788	590,787	2,916,575
DEBT SERVICE REQUIREMENTS				
Principal & Interest (B)	788,438	1,583,543	641,023 (4)	2,224,566
Other Debt	-	-	-	-
Reserve Account @ 10%	-	79,510	49,750 (5)	129,260
Renewal & Replacement Fund (2.5%)	118,129	145,295	(4,910) (6)	140,385
Total Debt Service Requirement	906,567	1,808,348	685,863	2,494,210
SB 234 Cash Working Capital	375,614	422,027	-	422,027
Remaining Cash	348,233	95,413	(95,076)	337
Percent Coverage (A) / (B)	206.79%	146.87%		131.11%
Average rate for 3,400 gallons	\$ 55.50	\$ 73.52	\$ 7.94	\$ 81.46
Average rate for 4,000 gallons	\$ 63.00	\$ 83.30	\$ 9.00	\$ 92.30

**CITY OF ST. ALBANS - WATER
CASH FLOW ANALYSIS
YEAR ENDED: June 30, 2025
APPLICATION NO: 2026W-2759**

**Attachment B
LOAN PACKAGE
SCENARIO 2**

Staff Adjustments

<u>Adjustment Description</u>				\$	Increase <Decrease>
(1)	Operating Revenues	Per Staff Analysis	5,514,387	156,973	
		Per Application with Project	5,357,414		
	Adjust revenues in accordance with PSC General Order 183.11. In addition, Staff projected that an additional \$579,000 in revenues would be needed to achieve 115% debt service coverage and a positive cash flow surplus.				
(2)	SB 234 Annual Working Cash Collections	Per Staff Analysis	422,027	422,027	
		Per Application with Project	-		
	Account for SB 234 (2015) funding pursuant to PSC General Order 183.11.				
(3)	Operating Expenses	Per Staff Analysis	3,376,213	(11,787)	
		Per Application with Project	3,388,000		
	Staff's calculation removes the Administrative Fee from the Scenario 2 analysis.				
(4)	Principal & Interest	Per Staff Analysis	2,224,566	641,023	
		Per Application with Project	1,583,543		
	The difference in P&I is related to Staff's calculation of a loan of \$12,968,000 for 40 years (paid back over 38 years) at 5%.				
(5)	Reserve Account @ 10%	Per Staff Analysis	129,260	49,750	
		Per Application with Project	79,510		
	Staff assumed a 10% reserve on the new debt.				
(6)	Renewal & Replacement Fund (2.5%)	Per Staff Analysis	140,385	(4,910)	
		Per Application with Project	145,295		
	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

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Harold D. Ward, Cabinet Secretary
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M E M O R A N D U M

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

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

DATE: June 18, 2026

SUBJECT: Infrastructure Preliminary Application for the City of St. Albans: Phase I Water System Improvements in Kanawha County, WV. (2026W-2759)

We have reviewed the above referenced project application information. The City of St. Albans, discharges its backwash to its site, which is covered under WV/NPDES Site Registration No. WVG640139, and expires July 18, 2028.

If the City of St. Albans 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 City of St. Albans 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 sandblasting. If it is determined that the paint is not hazardous, the City of St. Albans should contact John Lockhart or a member of his staff at (304)-926-0499, extension 43821 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