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west virginia department of environmental protection

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

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

**MEMORANDUM**

**To:** Brad Sergent, Chair  
Meredith J. Vance, Director, Environmental Engineering Division, BPH

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

**Date:** May 21, 2026

**Subject:** Cool Ridge-Flat Top PSD  
IJDC Application - 2026W-2777  
Leak Detection Analysis & Phase II System Improvements Project

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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.

Promoting a healthy environment.

- 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 project will replace water distribution lines, services, and meters along Route 19, Mount View Road, and Daisy Trail. Approximately 45,700 LF of new waterline, 258 meters, and 20 fire hydrants are proposed to be installed. These upgrades are expected to improve system reliability, enhance fire protection, and provide substantial financial savings by reducing the volume of water purchased from the Beckley Water Company.

The total estimated cost of this project is \$7,410,000.00. The proposed funding scenario includes a \$1,500,000 CDS Grant, a \$375,000 WV Governor's CDS Matching Grant, a \$1,500,000 DWTRF Principal Forgiveness Loan, a \$500,000 WVIJDC Grant, a \$800,000 USDA Rural Development Grant, and a \$2,735,000 USDA Rural Development Loan (3.75% interest, 40 years). The current monthly rate for 3,400 gallons is \$60.58 (1.68 MHI).

The project only qualifies for \$1,000,000 in DWTRF Principal Forgiveness Funding.

Preliminary Project Ratings:

Public Health Benefits: 5  
Compliance with Standards: 10



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### MEMORANDUM

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

**FROM:** Tyler Barrett, E.I., DWWM

**DATE:** May 11, 2026

**SUBJECT:** Cool Ridge-Flat Top PSD  
IJDC Application - 2026W-2777  
Leak Detection Analysis & Phase II System Improvements Project

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### RECOMMENDATION

The IJDC Application and Preliminary Engineering Report (PER) prepared by L.A. Gates Company for the above referenced project has been reviewed and is technically feasible.

### PROJECT DESCRIPTION

The Cool Ridge-Flat Top Public Service District (PSD) operates a water distribution system (PWSID #WV3304139) serving 1,926 connections in the Cool Ridge, Flat Top, Ghent, and Shady Springs areas of Raleigh County, West Virginia. The PSD purchases water from the Beckley Water Company. The PSD's distribution system consists of approximately 387,000 LF of piping, ranging from 2-inches to 8-inches in size, as well as four (4) active water storage tanks and three (3) booster stations.

This project is intended to address the significant water loss in the system, which at times can exceed 30%. The water loss is primarily caused by aging infrastructure constructed in the late 1970s and early 1980s. Phase II targets the replacement of water distribution lines, services, and meters along Route 19, Mount View Road, and Daisy Trail. Approximately 45,700 LF of new waterline, 258 meters, and 20 fire hydrants are proposed to be installed. These upgrades are expected to improve system reliability, enhance fire protection, and provide substantial financial

savings by reducing the volume of water purchased from the Beckley Water Company. The total estimated cost of this project is \$7,410,000.00. The proposed funding scenario includes a \$1,500,000 FY27 US EPA DWTRF CPF Grant, a \$375,000 WV Governor's CDS Matching Grant, a \$1,500,000 DWTRF Principal Forgiveness Loan, a \$500,000 WVIJDC Grant, a \$800,000 USDA Rural Development Grant, and a \$2,735,000 USDA Rural Development Loan (3.75% interest, 40 years). The current monthly rate for 3,400 gallons is \$60.58.

### **NEED FOR PROJECT**

The PSD's water distribution system suffers from significant water loss, ranging from 24% to 53% annually. This directly impacts the PSD's financial welfare since all water is purchased from the Beckley Water Company. Additionally, persistent leaks and frequent line breaks lead to many repairs, boil water advisories, and system contamination.

### **DEFICIENCIES/COMMENTS**

- Using the Combined Application, the Design and Total Engineering Fees appear to be within the ASCE Curves.
- Include the number of residential & non-residential customers.
- Include non-residential customers as EDU's.
- Include water usage projections (avg. & peak).
- Include user rates as % of MHI.

#### **Preliminary Project Ratings:**

Public Health Benefits: 5  
Compliance with Standards: 10

# 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



May 14, 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-2777  
Cool Ridge-Flat Top PSD – Water System Improvements (Phase II)  
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:** May 13, 2026

**PROJECT SPONSOR:** COOL RIDGE-FLAT TOP PSD - WATER

**PROJECT SUMMARY:** The Cool Ridge-Flat Top Public Service District is proposing to pursue Phase II improvements to its existing water distribution system.

|                                      |                  |
|--------------------------------------|------------------|
| <b>PROPOSED FUNDING:</b> USEPA Grant | \$ 1,500,000     |
| CDS Match                            | 375,000          |
| DWTRF Principal Forgiveness          | 1,500,000        |
| IJDC Grant                           | 500,000          |
| USDA Grant                           | 800,000          |
| USDA Loan (3.75%, 40 years)          | <u>2,735,000</u> |
| Total                                | \$ 7,410,000     |

**CURRENT RATES:** \$50.85 3,400 gallons  
\$59.38 4,000 gallons

**PROPOSED RATES:** \$60.58 3,400 gallons  
\$70.82 4,000 gallons

Application No.2026W-2777

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

**FINANCIAL:** Nathan Nelson

1. Current rates (\$50.85 for 3,400 gallons) are above the rate attributable to 1.25% (\$45.09) of the Median Household Income (MHI), but below the rates attributable to 1.5% (\$54.10), 1.75% (\$63.12) and 2.0% (\$72.14) of the MHI. Increasing current rates to 1.5%, 1.75%, and 2.0% of the MHI would provide additional revenues of \$82,077, \$309,542, and \$537,007 respectively.

2. Using Scenario 1, the preferred funding package consisting of a USEPA Grant of \$1,500,000, Congressionally Directed Spending of \$375,000, DWTRF Principal Forgiveness of \$1,500,000, an IJDC Grant of \$500,000, a USDA Grant of \$800,000, and a USDA Loan of \$2,735,000 at 3.75% for a term of 40 years (paid back over 38 years), proposed rates (\$60.58 for 3,400 gallons) will provide a cash flow surplus of \$11,939 and debt service coverage of 164.76%.
3. Using the Scenario 2 alternate loan package of \$7,410,000 (in uncommitted funds) at 5% for 40 years (paid back over 38 years), proposed rates (\$72.00 for 3,400 gallons) will provide a cash flow surplus of \$2,243 and debt service coverage of 140.23%.
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 \$52.42 (for 3,400 gallons). However, these rates are Staff Recommended Step 2 rates from Case No. 25-0839-PWD-19A. The rates are currently being published. A Recommended Decision has not yet been issued approving the Staff Recommended rates.
  - D. The Applicant's cash flow statement includes Proforma and Proforma #2 calculations. The Proforma adjustments account for a separate Ellison Ridge waterline extension, which received prior approval as Project Number 2022W-2289. Also included at Proforma is Project Number 2026W-2776, distribution system improvement project. The Applicant's Proforma #2 adjustments are for the project under review. Staff's Proforma analysis combines the adjustments from all three projects.
  - 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 Cool Ridge-Flat Top Public Service District is proposing to pursue Phase II improvements to its existing water distribution system. The proposed project scope includes: mobilization, pre-construction video, erosion and sediment control, 9700 LF of 4-inch PVC water main, 9000 LF of 6-inch PVC water main, 27000 LF of 10-inch PVC water main, 170 LF of 12-inch steel casing, 150 LF of 16-inch steel casing, 600 LF of 24-inch steel casing, 1250 LF of 3/4-inch PVC service line, nine (9) 4-inch gate valve and box, nine (9) 6-inch gate valve and box, twenty-eight (28) 10-inch gate valve and box, 20 fire hydrants, 10 flow monitoring stations, 12 air release valves, 10 blow off valves, 1100 LF of 3/4-inch road crossing (bore & jack), 258 customer reconnections (with meters), 5 tie-ins to existing water lines, 3220 LF of WVDOH Trench Repair (asphalt), 5950 LF of driveway repair (asphalt/concrete), 43200 LF of WVDOH permit, and necessary appurtenances. The estimated construction cost is \$6,237,141 (includes 10% construction contingency), and the estimated total project cost is \$7,410,000.

Need: The PER indicates that Cool Ridge-Flat Top PSD has water loss ranging from 24%-53%. The PER states the majority of the main system was constructed in the late 1970s and early 1980s, with methods that are not acceptable today.

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 \$7,410,000, and having approximately 1879 customers, the cost per customer will be approximately \$3,944.

3. Project Alternatives: The PER indicates that 2 Alternatives were considered: Option 1 – Phase I – Replace Vulnerable Water Lines in the System; and Option 2 – Do Nothing. The PER indicates the combination of the utility being a finished water purchaser and its history of water loss, is the major factor in selecting Option 1.
4. Consolidation: There are no consolidation opportunities presented by this project.
5. Operation and Maintenance (O&M) Expenses: The PER did not include a detailed breakdown, but did provide a brief discussion of anticipated changes to O&M expenses. The PER indicates that O&M expenses should decrease following completion of the project, as the project should result in a decrease in water loss volumes.
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 \$732,500, which is equal to 11.74% of the construction cost of \$6,237,141 (includes 10% construction contingency).
7. Deficiencies/Comments:
  - Based on a review of the Cool Ridge-Flat Top PSD's Annual Reports (filed at the PSC), the utility routinely does not appear to consistently report/account for gallons lost for flushing, fire department use, main leaks, backwashing, blowing settling basins, etc. Although some amounts of water are reported as "lost accounted for", the lack of recording/reporting, or accounting for, water usage for these reasons directly results in a higher unaccounted for lost water percentages. For example: FY 2025 – 39.32% percent unaccounted for (0-gallons lost accounted for), FY 2024 – 37.29% percent unaccounted for (1,435,000-gallons lost accounted for), FY 2023 – 45.26% percent unaccounted for (813,000-gallons lost accounted for), FY 2022 – 35.36% percent unaccounted for (14,888,000-gallons lost accounted for), and FY 2021 – 26.94% percent unaccounted for (93,109,000-gallons lost accounted for).

COOL RIDGE-FLAT TOP PSD - WATER  
 CASH FLOW ANALYSIS  
 YEAR ENDED: June 30, 2025  
 APPLICATION NO: 2026W-2777  
 May 14, 2026

**PREFERRED FUNDING PACKAGE  
 SCENARIO 1**

|  | Rule 42<br>Going Level<br>Per Application<br>Before Project | Rule 42<br>Proforma<br>Per Application<br>with Project | Staff<br>Adjustments | Per Staff<br>Analysis |
|--|---|--|----------------------|-----------------------|
|  | 1   | 2  | 3                    | 4                     |
|  | \$  | \$   | \$                   | \$                    |
| <b><u>AVAILABLE CASH</u></b>                           |   |  |                      |                       |
| Operating Revenues                                     | 1,511,553   | 1,762,844  | (144,794) (1)        | 1,618,050             |
| Other Operating Revenue                                | 31,938  | 33,610   | -                    | 33,610                |
| SB 234 Annual Working Cash Collections                 |   |  | 144,794 (2)          | 144,794               |
| Interest Income & Other Misc.                          | 8,151   | 8,151  | -                    | 8,151                 |
| <b>Total Cash Available</b>                            | <b>1,551,642</b>  | <b>1,804,605</b>                                       | <b>-</b>             | <b>1,804,605</b>      |
| <b><u>OPERATING DEDUCTIONS</u></b>                     |   |  |                      |                       |
| Operating Expenses                                     | 1,167,711   | 1,158,354  | -                    | 1,158,354             |
| Taxes  | 21,186  | 21,186   | -                    | 21,186                |
| <b>Total Cash Requirements Before<br/>Debt Service</b> | <b>1,188,897</b>  | <b>1,179,540</b>                                       | <b>-</b>             | <b>1,179,540</b>      |
| Cash Available for Debt Servi (A)                      | 362,745   | 625,065  | -                    | 625,065               |
| <b><u>DEBT SERVICE REQUIREMENTS</u></b>                |   |  |                      |                       |
| Principal & Interest (B)                               | 166,572   | 378,335  | 1,048 (3)            | 379,383               |
| Other Debt   | 26,376  | 26,376   | -                    | 26,376                |
| Reserve Account @ 10%                                  |   | 21,177   | 104 (4)              | 21,281                |
| Renewal & Replacement Fund (2.5%)                      | 38,791  | 45,115   | (3,824) (5)          | 41,291                |
| <b>Total Debt Service Requirement</b>                  | <b>231,739</b>  | <b>471,003</b>   | <b>(2,672)</b>       | <b>468,331</b>        |
| SB 234 Cash Working Capital                            | 145,964   | 144,794  | -                    | 144,794               |
| <b>Remaining Cash</b>                                  | <b>(14,958)</b>   | <b>9,268</b>   | <b>2,672</b>         | <b>11,939</b>         |
| Percent Coverage (A) / (B)                             | 217.77%   | 165.21%  |                      | 164.76%               |
| Average rate for 3,400 gallons                         | \$ 52.42  | \$ 60.58   | \$ -                 | \$ 60.58              |
| Average rate for 4,000 gallons                         | \$ 61.28  | \$ 70.82   | \$ -                 | \$ 70.82              |

**Staff Adjustments**

| <u>Adjustment Description</u>  |                                     | \$               | Increase<br><Decrease> |
|--|-------------------------------------|------------------|------------------------|
| (1) <b>Operating Revenues</b>  | <b>Per Staff Analysis</b>           | <b>1,618,050</b> | <b>(144,794)</b>       |
|  | <b>Per Application with Project</b> | <b>1,762,844</b> |                        |
| Adjust revenues in accordance with PSC General Order 183.11.   |                                     |                  |                        |
| (2) <b>SB 234 Annual Working Cash Collections</b>  | <b>Per Staff Analysis</b>           | <b>144,794</b>   | <b>144,794</b>         |
|  | <b>Per Application with Project</b> | -                |                        |
| Account for SB 234 (2015) funding pursuant to PSC General Order 183.11.  |                                     |                  |                        |
| (3) <b>Principal &amp; Interest</b>  | <b>Per Staff Analysis</b>           | <b>379,383</b>   | <b>1,048</b>           |
|  | <b>Per Application with Project</b> | <b>378,335</b>   |                        |
| The difference in P&I is related to Staff's calculation of a loan of \$2,735,000 for 40 years (paid over 38 years) at 3.75%. |                                     |                  |                        |
| (4) <b>Reserve Account @ 10%</b>   | <b>Per Staff Analysis</b>           | <b>21,281</b>    | <b>104</b>             |
|  | <b>Per Application with Project</b> | <b>21,177</b>    |                        |
| Staff assumed a 10% reserve on the new debt.   |                                     |                  |                        |
| (5) <b>Renewal &amp; Replacement Fund (2.5%)</b>   | <b>Per Staff Analysis</b>           | <b>41,291</b>    | <b>(3,824)</b>         |
|  | <b>Per Application with Project</b> | <b>45,115</b>    |                        |
| Staff used 2.5% of the projection of "Operating & Other Revenues" as the basis of the renewal & replacement fund.            |                                     |                  |                        |

COOL RIDGE-FLAT TOP PSD - WATER  
 CASH FLOW ANALYSIS  
 YEAR ENDED: June 30, 2025  
 APPLICATION NO: 2026W-2777  
 May 14, 2026

**LOAN FUNDING PACKAGE  
 SCENARIO 2**

|  | Max Rate<br>Going Level<br>Per Application<br>Before Project | Max Rate<br>Proforma<br>Per Application<br>with Project | Staff<br>Adjustments | Per Staff<br>Analysis |
|--|--|---|----------------------|-----------------------|
|  | 1  | 2   | 3                    | 4                     |
|  | \$   | \$  | \$                   | \$                    |
| <b><u>AVAILABLE CASH</u></b>                           |  |   |                      |                       |
| Operating Revenues                                     | 1,511,553  | 2,094,876   | (144,794) (1)        | 1,950,082             |
| Other Operating Revenue                                | 31,938   | 33,610  | -                    | 33,610                |
| SB 234 Annual Working Cash Collections                 |  |   | 144,794 (2)          | 144,794               |
| Interest Income & Other Misc.                          | 8,151  | 8,151   | -                    | 8,151                 |
| <b>Total Cash Available</b>                            | <b>1,551,642</b>   | <b>2,136,637</b>  | <b>-</b>             | <b>2,136,637</b>      |
| <b><u>OPERATING DEDUCTIONS</u></b>                     |  |   |                      |                       |
| Operating Expenses                                     | 1,167,711  | 1,158,354   | -                    | 1,158,354             |
| Taxes  | 21,186   | 21,186  | -                    | 21,186                |
| <b>Total Cash Requirements Before<br/>Debt Service</b> | <b>1,188,897</b>   | <b>1,179,540</b>  | <b>-</b>             | <b>1,179,540</b>      |
| Cash Available for Debt Service (A)                    | 362,745  | 957,097   | -                    | 957,097               |
| <b><u>DEBT SERVICE REQUIREMENTS</u></b>                |  |   |                      |                       |
| Principal & Interest (B)                               | 166,572  | 671,972   | 10,527 (3)           | 682,499               |
| Other Debt   | 26,376   | 26,376  | -                    | 26,376                |
| Reserve Account @ 10%                                  |  | 50,540  | 1,053 (4)            | 51,593                |
| Renewal & Replacement Fund (2.5%)                      | 38,791   | 53,416  | (3,824) (5)          | 49,592                |
| <b>Total Debt Service Requirement</b>                  | <b>231,739</b>   | <b>802,304</b>  | <b>7,756</b>         | <b>810,060</b>        |
| SB 234 Cash Working Capital                            | 145,964  | 144,794   | -                    | 144,794               |
| <b>Remaining Cash</b>                                  | <b>(14,958)</b>  | <b>9,999</b>  | <b>(7,756)</b>       | <b>2,243</b>          |
| Percent Coverage (A) / (B)                             | 217.77%  | 142.43%   |                      | 140.23%               |
| Average rate for 3,400 gallons                         | \$ 52.42   | \$ 72.00  | \$ -                 | \$ 72.00              |
| Average rate for 4,000 gallons                         | \$ 61.28   | \$ 84.17  | \$ -                 | \$ 84.17              |

**Staff Adjustments**

| <u>Adjustment Description</u> |   |                                     | \$               | Increase<br><Decrease> |
|-------------------------------|---|-------------------------------------|------------------|------------------------|
| (1)                           | <b>Operating Revenues</b>   | <b>Per Staff Analysis</b>           | <b>1,950,082</b> | <b>(144,794)</b>       |
|                               |   | <b>Per Application with Project</b> | <b>2,094,876</b> |                        |
|                               | Adjust revenues in accordance with PSC General Order 183.11.  |                                     |                  |                        |
| (2)                           | <b>SB 234 Annual Working Cash Collections</b>   | <b>Per Staff Analysis</b>           | <b>144,794</b>   | <b>144,794</b>         |
|                               |   | <b>Per Application with Project</b> | <b>-</b>         |                        |
|                               | Account for SB 234 (2015) funding pursuant to PSC General Order 183.11.   |                                     |                  |                        |
| (3)                           | <b>Principal &amp; Interest</b>   | <b>Per Staff Analysis</b>           | <b>682,499</b>   | <b>10,527</b>          |
|                               |   | <b>Per Application with Project</b> | <b>671,972</b>   |                        |
|                               | The difference in P&I is related to Staff's calculation of a loan of \$7,410,000 for 40 years (paid over 38 years) at 5%. |                                     |                  |                        |
| (4)                           | <b>Reserve Account @ 10%</b>  | <b>Per Staff Analysis</b>           | <b>51,593</b>    | <b>1,053</b>           |
|                               |   | <b>Per Application with Project</b> | <b>50,540</b>    |                        |
|                               | Staff assumed a 10% reserve on the new debt.  |                                     |                  |                        |
| (5)                           | <b>Renewal &amp; Replacement Fund (2.5%)</b>  | <b>Per Staff Analysis</b>           | <b>49,592</b>    | <b>(3,824)</b>         |
|                               |   | <b>Per Application with Project</b> | <b>53,416</b>    |                        |
|                               | Staff used 2.5% of the projection of "Operating & Other Revenues" as the basis of the renewal & replacement fund.         |                                     |                  |                        |



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west virginia department of environmental protection


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Division of Water and Waste Management  
601 57<sup>th</sup> Street, SE  
Charleston, WV 25304-2345  
Telephone: 304-926-0495  
Fax: 304-926-0463

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

**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:** April 29, 2026

**SUBJECT:** Infrastructure Preliminary Application for the Cool Ridge - Flat Top PSD  
(2026W-2777): Water Loss Analysis & System Improvements Part C in Raleigh  
County, WV.

We have reviewed the above referenced project application information. The Cool Ridge - Flat Top PSD purchases water from the Beckley Water Company. No NPDES permit modifications are necessary.

If the Cool Ridge - Flat Top PSD 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 Cool Ridge - Flat Top PSD 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 Cool Ridge - Flat Top PSD 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