

Stormwater Management Plan

Town of Elon

NCS000403

January 30, 2025



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PART 1: INTRODUCTION

The purpose of this Stormwater Management Plan (SWMP) is to establish and define the means by which the Town of Elon will comply with its National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permit and the applicable provisions of the Clean Water Act to meet the federal standard of reducing pollutants in stormwater runoff to the maximum extent practicable.

This SWMP identifies the specific elements and minimum measures that the Town of Elon will develop, implement, enforce, evaluate and report to the North Carolina Department of Environmental Quality (NCDEQ) Division of Energy, Minerals and Land Resources (DEMLR) in order to comply with the MS4 Permit number **NCS000403** as issued by NCDEQ. This permit covers activities associated with the discharge of stormwater from the MS4 as owned and operated by the Town of Elon and located within the corporate limits of the Town of Elon.

In preparing this current SWMP, the Town of Elon has evaluated its MS4, the permit requirements of its MS4, and previous Comprehensive Stormwater Management Plans to develop comprehensive 5-year SWMP that will meet the community's needs, address local water quality issues and provide the minimum measures necessary to comply with the permit. The SWMP will be evaluated and updated annually to ensure that the elements and minimum measures it contains continue to adequately provide for permit compliance and the community's needs.

Once the SWMP is approved by NCDEQ, all provisions contained and referenced in this SWMP, along with any approved modifications of the SWMP, are incorporated by reference into the permit and become enforceable parts of the permit. Any major changes to the approved SWMP will require resubmittal, review and approval by NCDEQ, and may require a new public comment period depending on the nature of the changes.

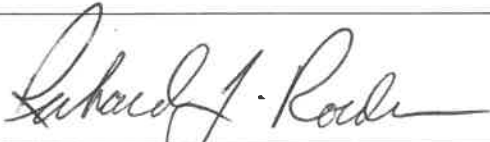
PART 2: CERTIFICATION

By my signature below I hereby 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 fines and imprisonment for knowing violations.

I am also aware that the contents of this document shall become an enforceable part of the NPDES MS4 Permit, and that both the Division and the Environmental Protection Agency have NPDES MS4 Permit compliance and enforcement authority.

- I am a ranking elected official.
- I am a principal executive officer for the permitted MS4.
- I am a duly authorized representative for the permitted MS4 and have attached the authorization made in writing by a principal executive officer or ranking elected official which specifies me as (*check one*):
 - A specific individual having overall responsibility for stormwater matters.
 - A specific position having overall responsibility for stormwater matters.

Signature:	
Print Name:	Richard Roedner
Title:	Town Manager
Signed this	4 th day Feb. of 2025

PART 3: MS4 INFORMATION

3.1 Permitted MS4 Area

This SWMP applies throughout the corporate limits of the Town of Elon, including all regulated activities associated with the discharge of stormwater from the MS4. The map below shows the corporate limits of Town of Elon as of the date of this document.

Corporate Limits are shown on the Map Below in Red

3.2 Existing MS4 Mapping

The current MS4 mapping includes mapping of Storm drain piping, Streams, Pumpstations, Outfall Locations and Industrial Permitted sites.

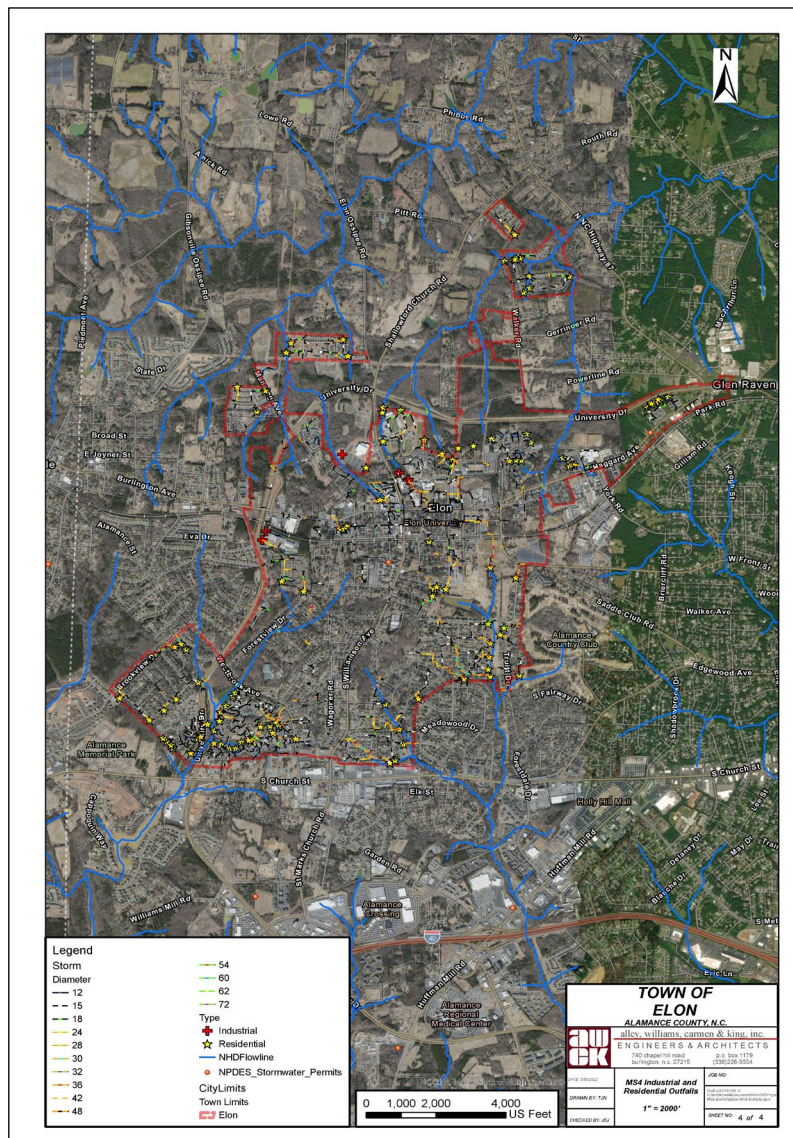


Table 1: Summary of Current MS4 Mapping

Percent of MS4 Area Mapped**	100	%
No. of Major Outfalls* Mapped	25	Of 125 total outfalls

**An outfall is a point where the MS4 discharges from a pipe or other conveyance (e.g. a ditch) directly into surface waters. Major outfalls are required to be mapped to meet permit requirements. A major outfall is a 36-inch diameter pipe or discharge from a drainage area > 50-acres; and for industrial zoned areas a 12-inch diameter pipe or a drainage area ≥ 2-acres.*

**** Elon’s entire stormwater system is mapped currently but due to rapid growth this is an ongoing task**

3.3 Receiving Waters

The Town of Elon MS4 is located within the Cape Fear River Basin and discharges directly into receiving waters as listed in Table 2 below. Applicable water quality standards listed below are compiled from the following NCDEQ sources:

- [Waterbody Classification Map](#)
- [Impaired Waters and TMDL Map](#)
- Most recent NCDEQ Final [303\(d\) List](#)

Table 2: Summary of MS4 Receiving Waters

Receiving Water Name	Stream Index / AU Number	Water Quality Classification	303(d) Listed Parameter(s) of Interest
Dry Creek	16-13	WS-V; NSW	NA
Gunn Creek	16-19-7	WS-V; NSW	NA
Unnamed Tributary to Dry Creek (Joins Dry Creek north of Town’s ETJ)	16-19-7	WS-V; NSW	N/A
Michael’s Branch	16-19-5-1	WS-V; NSW	N/A
Unnamed Tributary to Travis Creek (Cable Branch)	16-12	WS-V; NSW	Benthos
Travis Creek	16-12	WS-V, NSW	Benthos

3.4 MS4 Interconnection

The Town of Elon’s MS4 is interconnected with the NCDOT MS4 within NCDOT owned right of ways and the Town of Gibsonville MS4.

3.5 Total Maximum Daily Loads (TMDLs)

The TMDL(s) listed in Table 3 below have been approved within the MS4 area, as determined by the map and list provided on the [NCDEQ Modeling & Assessment Unit web page](#). The table also indicates whether the approved TMDL has a specific stormwater Waste Load Allocation (WLA) for any watershed directly receiving discharges from the permitted MS4, and whether a Water Quality Recovery Program has been implemented to address the WLA.

Table 3: Summary of Approved TMDLs

Water Body Name	TMDL Pollutant(s) of Concern	Stormwater Waste Load Allocation (Y/N)	Water Quality Recovery Program (Y/N)
Jordan Lake TMDL	Nitrogen, Phosphorus	N	Y

The Jordan Lake TMDL is the subject of extensive rulemaking, of which the Town of Elon complies with and will comply with future rulemaking regarding.

3.6 Endangered and Threatened Species and Critical Habitat

Significant populations of threatened or endangered species and/or critical habitat are not identified within the regulated MS4 urbanized area. Based upon a review of the [Endangered and Threatened Species and Species of Concern by County for North Carolina Map](#) and [Listed species believe to or known to occur in North Carolina map](#) as provided by the [U.S. Fish and Wildlife Service](#), the species listed in Table 4 have the potential to occur within the regulated MS4 urbanized area. Of those species listed, Table 4 summarizes the species that may be significantly impacted by the quality of surface waters within their habitat.

Table 4: Potential Federally Listed Species/Habitat Impacted by Surface Water Quality

Scientific Name	Common name	Species Group	Federal Listing Status
Helianthus Schweinitzil	Schweinitz's Sunflower	Flowering Plants	Endangered
Danus Plexippus	Monarch Butterfly	Insects	Candidate
Fusconaia Masoni	Atlantic Pigtoe	Clams	Proposed Threatened
Notropis Mekistocholas	Cape Fear Shiner	Fishes	Endangered

3.7 Industrial Facility Discharges

The Town of Elon MS4 jurisdictional area includes the following industrial facilities which hold NPDES Industrial Stormwater Permits, as determined from the [NCDEQ Maps & Permit Data web page](#).

Table 5: NPDES Stormwater Permitted Industrial Facilities

Permit Number	Facility Name
NCS000403	Town of Elon – Small MS4
NCGNE0993	Engineering Controls International, LLC

3.8 Non-Stormwater Discharges

The water quality impacts of non-stormwater discharges have been evaluated by the Town of Elon as summarized in Table 6 below. The unpermitted non-stormwater flows listed as incidental do not significantly impact water quality. The Town of Elon has evaluated residential and charity car washing and street washing for possible significant water quality impacts.

Street washing discharges are addressed under the Pavement Management Program in Part 10 of this SWMP. The Division has not required that other non-stormwater flows be specifically controlled by the Town of Elon.

Wash water associated with car washing that does not contain detergents or does not discharge directly into the MS4 is considered incidental. However, these types of non-stormwater discharges that do contain detergents have been evaluated by the Town of Elon to determine whether they may significantly impact water quality. **Currently runoff from car washing in The Town of Elon would be considered incidental.**

Table 6: Non-Stormwater Discharges

Non-Stormwater Discharge	Water Quality Impacts
Water line and fire hydrant flushing	Incidental
Landscape irrigation	Incidental
Diverted stream flows	Incidental
Rising groundwater	Incidental
Uncontaminated groundwater infiltration	Incidental
Uncontaminated pumped groundwater	Incidental
Uncontaminated potable water sources	Incidental
Foundation drains	Incidental
Air conditioning condensate	Incidental
Irrigation waters	Incidental
Springs	Incidental
Water from crawl space pumps	Incidental
Footing drains	Incidental
Lawn watering	Incidental
Residential and charity car washing	Possible
Flows from riparian habitats and wetlands	Incidental
Dechlorinated swimming pool discharges	Incidental
Street wash water	Possible
Flows from firefighting activities	Incidental

3.9 Target Pollutants and Sources

In addition to those target pollutants identified below, the Town of Elon is not aware of other significant water quality issues within the permitted MS4 area.

The education program will target total suspended solids and nutrient loading because turbidity, sedimentation, and nutrients are the pollutants of concern in downstream waters. In addition, floatables, trash, and debris will also be targeted. The education program will also address the proper use and disposal of typical household chemicals, garden chemicals, and used motor oil.

Table 7 below summarizes the water quality pollutants identified throughout Part 3 of this SWMP, the likely activities/sources/targeted audiences attributed to each pollutant and identifies the associated SWMP program(s) that address each. In addition, the Town of Elon has evaluated schools, homeowners and businesses as target audiences that are likely to have significant stormwater impacts.

Table 7: Summary of Target Pollutants and Sources

Target Pollutant(s)	Likely Source(s)/Target Audience(s)	SWMP Program Addressing Target Pollutant(s)/Audience(s)
Litter	Residents, Businesses, Schools	Public Education & Outreach
Sediment	Residents, Businesses	Public Education & Outreach
Nitrogen and Phosphorous	Fertilizer/Residents	Public Education & Outreach

PART 4: STORMWATER MANAGEMENT PROGRAM ADMINISTRATION

4.1 Organizational Structure

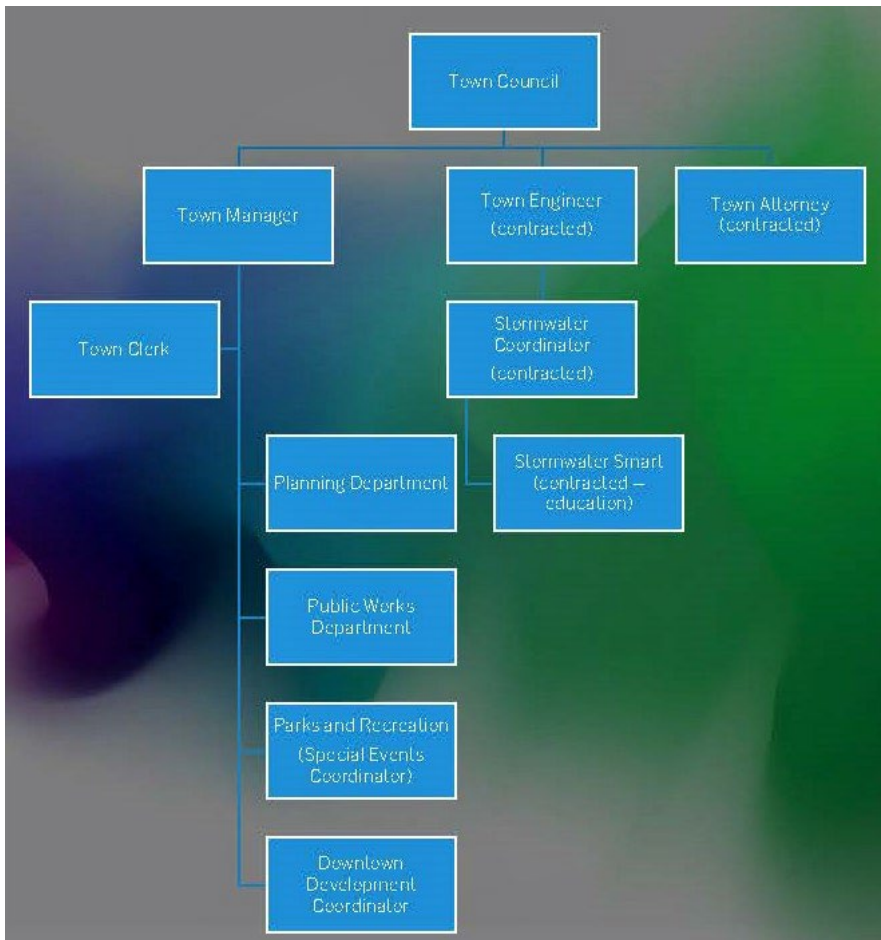


Table 8: Summary of Responsible Parties

Position	Name	Phone No.	Fax No.	Email
Town Manager	Richard Roedner	336-584-3601	336-584-5334	roedner@elon.gov
Town Clerk	DiAnne Enoch	336-584-3601	336-584-5334	denoch@elon.gov
Public Works Director	Donnie Wood	336-584-9600	336-584-8307	dwood@elon.gov
Town Planner	Lori Oakley	336-584-3601	336-584-5334	loakley@elon.gov
Town Attorney	Bob Hagemann	919-783-2987		RHagemann@poynerspruill.com

Town / Stormwater Engineer	Josh Johnson, P.E.	(336) 226-5534	(336) 226-3034	josh@awck.com
Stormwater Manager	Janet Paith	(336)226-5534	(336) 226-3034	jpaith@awck.com

General contacts for stormwater should be referred to Richard Roedner & Josh Johnson

Designated Stormwater Administrator – Josh Johnson, P.E. – Contracted.

SWMP Component	Responsible Position	Staff Name	Department
Stormwater Program Administration	Town Manager Stormwater Engineer	See Table 8	Administration / Engineering (Contracted)
SWMP Management	Town Manager Stormwater Engineer	See Table 8	Administration / Engineering (Contracted)
Public Education & Outreach	Town Manager Stormwater Manager Stormwater Smart	See Table 8	Administration / Engineering (Contracted) / Stormwater Smart (Contracted)
Public Involvement & Participation	Town Manager Stormwater Manager Stormwater Smart	See Table 8	Administration / Engineering (Contracted) / Stormwater Smart (Contracted)
Illicit Discharge Detection & Elimination	Town Manager Stormwater Engineer Public Works Director	See Table 8	Administration / Engineering (Contracted) / Public Works
Construction Site Runoff Control	Town Manager Stormwater Engineer Public Works Director	See Table 8	Engineering (Contracted) / Public Works
Post-Construction Stormwater Management	Planning Director Stormwater Manager	See Table 8	Planning / Engineering (contracted)
Pollution Prevention/Good Housekeeping for Municipal Operations	Town Manager Stormwater Engineer Public Works Director	See Table 8	Administration / Engineering (Contracted) / Public Works
Municipal Facilities Operation & Maintenance Program	Town Manager Stormwater Engineer Public Works Director	See Table 8	Engineering (Contracted) / Public Works
Spill Response Program	Town Manager Stormwater Engineer Public Works Director	See Table 8	Engineering (Contracted) / Public Works
MS4 Operation & Maintenance Program	Town Manager Stormwater Engineer Public Works Director	See Table 8	Engineering (Contracted) / Public Works

Municipal SCM Operation & Maintenance Program	Town Manager Stormwater Engineer Public Works Director	See Table 8	Engineering (Contracted) / Public Works
Pesticide, Herbicide & Fertilizer Management Program	Town Manager Stormwater Engineer Public Works Director	See Table 8	Public Works
Vehicle & Equipment Cleaning Program	Town Manager Stormwater Engineer Public Works Director	See Table 8	Public Works
Pavement Management Program	Town Manager Stormwater Engineer Public Works Director	See Table 8	Engineering (Contracted) / Public Works
Total Maximum Daily Load (TMDL) Requirements	Town Manager Stormwater Engineer	See Table 8	Administration / Engineering (Contracted)

4.2 Program Funding and Budget

In accordance with the issued permit, the Town of Elon shall maintain adequate funding and staffing to implement and manage the provisions of the SWMP and comply with the requirements of the NPDES MS4 Permit. The budget includes the permit administering and compliance fee, which is billed by the Division annually.

The Town of Elon funds its Stormwater Programs through a Stormwater Fee. The Town collects a flat fee of \$2/month or \$4/bimonthly utility fee from all utility users. The total stormwater budget for 2023-2024 was \$135,000. The Town uses its budget to pay for its Water Quality Programs including its NPDES Phase II and Jordan Lake Programs.

The Town has also used excess funding from the stormwater fund to fund other stormwater or water quality projects. This includes investigating drainage complaints from residents and investigating potential inflow/infiltration/exfiltration between the collections system and the MS4.

4.3 Shared Responsibility/Contracted Services

The Town of Elon implements 5 of the 6 minimum control measures, with the 6th measure being construction site runoff controls which is implemented through NC DEMLR’s Erosion and Sediment Control program.

The Town of Elon contracts with Stormwater Smart for assistance with Public Education and Public Involvement and Outreach. Stormwater Smart is not directly responsible for any items but rather assists the Town of Elon.

The Town of Elon contracts engineering services with Alley, Williams, Carmen, and King, Inc.. Alley, Williams, Carmen, and King is not directly responsible for any items but rather assists the Town of Elon.

4.4 Co-Permittees

There are no other entities applying for co-permittee status under the NPDES MS4 permit number NCS000403 for the Town of Elon. Table 10 summarizes contact information for each co-permittee.

4.5 Measurable Goals for Program Administration

The Town of Elon will manage and report the following Best Management Practices (BMPs) for the administration of the Stormwater Management Program.

Table 11: Program Administration BMPs				
Permit Ref.	2.1.2 and Part 4: Annual Self-Assessment Measures to evaluate the performance and effectiveness of the SWMP program components at least annually. Results shall be used by the permittee to modify the program components as necessary to accomplish the intent of the Stormwater Program. The self-assessment reporting period is the fiscal year (July 1 – June 30).			
BMP No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
1.	Annual Self-Assessment			
	Evaluate the performance and effectiveness of the program components at least annually. Results shall be used to modify the program components as necessary to accomplish the intent of the Stormwater Program.	1. Prepare, conduct and document an annual evaluation of the program components.	1. Annually Permit Year 1 – 5	1. Yes/No
Permit Ref.	1.6: Permit Renewal Application Measures to submit a permit renewal application no later than 180 days prior to the expiration date of the NPDES MS4 permit.			
BMP No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
2.	Permit Renewal Application			
	Submit a permit renewal application and Draft SWMP no later than 180 prior to permit expiration.	1. Draft SWMP applicable to the proceeding 5 years following permit re-issuance.	1. Permit Year 5	1. Yes/No

Table 11: Program Administration BMPs

		2. Certify the stormwater permit renewal application (Permit renewal application form and Draft SWMP for the next 5-year permit cycle) and submit to NCDEQ at least 180 days prior to permit expiration.	2. Permit Year 5	2. Date of permit renewal application submittal
Permit Ref.	2.1.1 Review Adequate Funding and Staffing Review adequate funding and staffing to implement and manage the provisions of the SWMP and meet the requirements of the permit.			
BMP No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
3.	Review Adequate Funding and Staffing needs.			
	Confirm that the program is adequately funded and staffed.	1. Verify adequate funding in the City's Budget.	1. Permit Year 1-5	1. Adequate/Inadequate
	Stormwater Services Contract	1. Sign contract	1. Permit Year 1	1. Yes / No
		2. Review contract for all permit required items.	2. Review Permit Years 2-5	2. Yes / No
Permit Ref.	2.2 Minimum Control Measures Maintain written procedures for implementing the six minimum control measures (MCM's), which identify specific action steps, schedules, resources and responsibilities for implementing the MCM's.			
BMP No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
4.	Procedures for implementing the Minimum Control Measures (MCM's)			
	Evaluate the performance and effectiveness of the program components. Results shall be used to modify the program components as necessary to accomplish the intent of the Stormwater Program.	1. Create all required written procedures for implementing the six MCM's.	1. Permit Year 1	1. Yes / No
		2. Review and update all written procedures as needed.	2. Permit Year 2-5	2. Yes / No

Table 11: Program Administration BMPs

Permit Ref.	2.1.7, 3.2.3 and 3.6.5(c): Web Site Measures to provide a web site designed to convey the program’s message(s) and provide online materials including ordinances, or other regulatory mechanisms, or a list identifying the ordinances or other regulatory mechanisms, providing the legal authority necessary to implement and enforce the requirements of the permit and SWMP. The web page shall also provide developers with all relevant post-construction requirements, design standards, checklists and/or other materials.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
5.	City’s Stormwater Webpage			
	Update and maintain the City’s Stormwater Webpage.	1. Verify City’s stormwater webpage is current.	1. Annually Permit Year 1-5	1. Yes / No
Permit Ref.	3.2.5: Stormwater Hotline Measures for a stormwater hotline/helpline for the purpose of public education and outreach.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
6.	Helpline/ Hotline			
	All stormwater related calls will be forwarded to the Public Works Director who will then distribute the information to appropriate employees.	1. Confirm hotline number works and log calls.	1. Continuously Permit Year 1- 5	1. Total annual number of calls

PART 5: PUBLIC EDUCATION AND OUTREACH PROGRAM

The Town of Elon will implement a Public Education and Outreach Program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and steps the public can take to reduce pollutants in storm water runoff.

The target audiences and identified pollutants listed in Part 3.9 of this SWMP, which will be addressed by the Public Education and Outreach Program, are summarized in Table 12 below. In addition, the Town of Elon is required to inform businesses and the general public of the hazards associated with illicit discharges, illegal dumping and improper disposal of waste.

Table 12: Summary of Target Pollutants & Audiences

Target Pollutants/Sources	Target Audience(s)
Litter	Residents, Businesses, Schools
Sediment	Residents, Businesses
Nitrogen and Phosphorous	Fertilizer/Residents

The Town of Elon will manage, implement, and report the following public education and outreach BMPs.

The Town partners with Stormwater SMART, an education and outreach organization hosted by the Piedmont Triad Regional Council (PTRC). Stormwater SMART is a cooperative group that is funded by several Piedmont municipalities. It was created in 2005 to provide education and outreach for MS4 Permittees (like the Town Of Elon) and concentrates on direct education of school children and residents.

**Piedmont Triad Regional Council
Stormwater Smart
Danica Heflin
1398 Carrollton Crossing Drive, Kernersville, NC 27284
(336) 904-0300**

Table 13: Public Education and Outreach BMPs

Permit Ref.	3.2.2 and 3.2.4: Outreach to Targeted Audiences			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
7.	Maintain a Stormwater education plan			
	Maintain education plan. Include in Plan the BMPs, schedule, targeted audiences, and measurable goals. Summarize plan and implementation progress in each annual report.	1. Maintain Public Education and Engagement Plan, documenting the existing outreach and education program implemented by City staff, including process for identifying target audiences for each pollutant and source.	1. Annually Permit Years 1-5	1. Yes / No
8.	Educational Stormwater Mailers, Brochures and Posters			
	Distribute Public Education Materials to identified user groups. Materials may be supplied through outside Stormwater information sources.	1. Distribute public education materials at: <ol style="list-style-type: none"> 1. public events 2. schools 3. mailings 4. municipal facilities 	1. Annually Permit Years 1-5	1. Contact Hours 2. Number of Educational Materials Distributed

PART 6: PUBLIC INVOLVEMENT AND PARTICIPATION PROGRAM

This SWMP identifies the minimum elements and implementation of a Public Involvement and Participation Program that complies with applicable State, Tribal and local public notice requirements. The Town of Elon will manage, implement and report the following public involvement and participation BMPs.

Table 14: Public Involvement and Participation BMPs				
Permit Ref.	3.3.1: Public Input Mechanisms for public involvement that provide for input on stormwater issues and the stormwater program.			
BMP No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
9.	Public Stormwater Program Meeting			
	A public meeting will be held Bi -annually to discuss the implementation of the permit. This meeting will provide the public with the opportunity to be involved with the stormwater program.	1. Hold a public meeting to solicit information about the City’s Stormwater Program.	1. Permit Years 2 and 4	1. Date of event
Permit Ref.	3.3.2: Volunteer Opportunities Measures to provide volunteer opportunities designed to promote ongoing citizen participation.			
BMP No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
10.	Volunteer Stormwater Program			
	The Town will promote various volunteer stormwater programs annually. These may include Big Sweep, Creek Week, Adopt-A-Stream programs, and Storm Drain Stenciling.	1. Hold one event per year in the community.	1. Fall or Spring Permit Years 1-5	1. Number of events 2. Number of participants 3. Estimate of effectiveness of event: number of bags collected, number of storm drains marked, or other

PART 7: ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM

The Town of Elon will develop, manage, implement, document, report and enforce an Illicit Discharge Detection and Elimination Program which shall, at a minimum, include the following illicit discharge detection and elimination BMPs.

Table 15: Illicit Discharge Detection and Elimination BMPs				
Permit Ref.	3.4.1: MS4 Map Measures to develop, update and maintain a municipal storm sewer system map including stormwater conveyances, flow direction, major outfalls and waters of the United States receiving stormwater discharges.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
11.	Storm sewer system map showing outfalls and the receiving body of water.			
	Maintain system map in support of inspection program. The map will note outfalls and receiving body of water for each outfall.	1. Maintain mapping as System changes.	1. Continuously, with updates made annually.	1. Yes / No
Permit Ref.	3.4.2: Regulatory Mechanism Measures to provide an IDDE ordinance or other regulatory mechanism that provides legal authority to prohibit, detect, and eliminate illicit connections and discharges, illegal dumping and spills into the MS4, including enforcement procedures and actions.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
12.	Review Illicit Discharge Ordinance			
	Maintain adequate ordinance or other legal authorities to prohibit illicit connections and discharges and enforce the approved IDDE program.	1. Maintain and enforce public ordinances. Update, if necessary, to maintain legal authority.	1. Biannually Permit Years 2 & 4	1. Yes / No

Table 15: Illicit Discharge Detection and Elimination BMPs

Permit Ref.	3.4.3: IDDE Plan			
	Measures to maintain and implement a written IDDE Plan to detect and address illicit discharges, illegal dumping and any non-stormwater discharges identified as significant contributors of pollutants to the MS4. The plan shall provide standard procedures and documentation to:			
	<ul style="list-style-type: none"> a) Locate priority areas likely to have illicit discharges, b) Conduct routine dry weather outfall inspections, c) Identify illicit discharges and trace sources, d) Eliminate the source(s) of an illicit discharge, and e) Evaluate and assess the IDDE Program. 			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
13.	Inspection/detection program to detect dry weather flows at MS4 outfalls.			
	Maintain written procedures and/or SOPs for detecting and tracing the sources of illicit discharges and for removing the sources or reporting the sources to the State to be properly permitted.	1. Implement IDDE Plan. Review and update IDDE Plan as needed	1. Annually Permit Years 1-5	1. Report number of dry weather inspections completed and results.
14.	Stream walks/ Dry weather testing and Outfall Inspections.	<ul style="list-style-type: none"> 1. Inspect minor outfalls (non-major) 2. Inspect Major outfalls. 3. Complete Outfall Priority Study 	<ul style="list-style-type: none"> 1. Inspect once per permit cycle. 2. Annually 3. Permit Year 1 	<ul style="list-style-type: none"> 1. Number of outfalls inspected for year 2. Number of outfalls inspected for year 3. Study Completed

Table 15: Illicit Discharge Detection and Elimination BMPs				
Permit Ref.	3.4.4: IDDE Tracking Measures for tracking and documenting the date(s) an illicit discharge, illicit connection or illegal dumping was observed, the results of the investigation, any follow-up of the investigation, the date the investigation was closed, the issuance of enforcement actions, and the ability to identify chronic violators.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
15.	Establish/ Maintain a tracking system for managing reported problem areas.			
	Document the date of investigations, any enforcement action(s) or remediation that occurred.	1. Maintain IDDE inspection records, notices of violations and compliance and other program records.	1. Annually Permit Years 1-5	1. Report number of IDDE issues reported, number investigated, number of NOV's issued, number of enforcement actions taken, number of NOV's closed
Permit Ref.	3.4.5: Staff IDDE Training Measures to provide training for municipal staff and contractors who, as part of their normal job responsibilities, may observe an illicit discharge, illicit connection, illegal dumping or spills. Training shall include how to identify and report illicit discharges, illicit connections, illegal dumping and spills. Each staff training event shall be documented, including the agenda/materials, date, and number of staff participating.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
16.	Train employees on how to inspect for illicit connections			
	Conduct in person or virtual training for appropriate municipal staff on detecting and reporting illicit connections and discharges.	1. Conduct employee training and document attendance.	1. Annually Permit Years 1-5	1. Report number of staff who completed IDDE training
Permit Ref.	3.4.6: IDDE Reporting Measures for the public and staff to report illicit discharges, illegal dumping and spills. The mechanism shall be publicized to facilitate reporting and shall be managed to provide rapid response by appropriately trained personnel.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
17.	Maintain Program to report discharges to personnel and the public			
	Maintain and publicize reporting mechanism(s) for the public to report illicit connections and discharges.	1. Maintain reporting helpline and email address.	1. Annually Permit Years 1-5	1. Yes / No

PART 8: CONSTRUCTION SITE RUNOFF CONTROL PROGRAM

In accordance with 15A NCAC 02H .0153, the Town of Elon relies upon the North Carolina Sedimentation Pollution Control Act (SPCA) of 1973 as a qualifying alternative program to meet a portion of the NPDES MS4 Permit requirements for construction site runoff control measures. The SPCA requirements include reducing pollutants in stormwater runoff from construction activities that result in land disturbance of greater than or equal to one acre and includes any construction activity that is part of a larger common plan of development that would disturb one acre or more. The state SPCA Program is either delegated to a city/town, delegated to a county, or implemented by NCDEQ in non-delegated areas.

The contact information for the responsible party for Construction Site Runoff Controls within the Town of Elon is:

NC Sedimentation and Erosion Control Program
Winston-Salem Regional Office
Tamera Eplin, P.E. Regional Environmental Engineer
450 west Hanes Mill Rd., Suite 300,
Winston Salem, NC 27105-7407
Phone: 336/776-9800

www.deq.nc.gov

The Town of Elon implements minimal BMP's regarding NC Sedimentation and Erosion Control due to lack of legal authority. All calls regarding erosion control are to be referred to NC DEQ as noted above.

Table 17: Construction Site Runoff Control BMPs

Permit Ref.	3.5.6: Public Input Measures to provide and promote a means for the public to notify the appropriate authorities of observed erosion and sedimentation problems.			
BMP No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
18.	Municipal Staff Training			
	Train municipal staff who receive calls from the public on the protocols for referral and tracking of construction site runoff control complaints.	1. Train municipal staff on proper handling of construction site runoff control complaints.	1. Annually Permit Years 1-5	1. Number of staff trained
Permit Ref.	3.5.5: Waste Management Measures to require construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impact to water quality.			
19.	Construction Site Waste Management			
	Construction material and construction waste pollutant control code.	1. Confirm city authority on construction site pollutant controls when pollutant is “leaving or likely leaving the site”.	1. Annually Permit Years 1-5	1. Yes / No
		2. Maintain Authority.	2. Permit Years 2-5 Maintain.	2. Yes / No

PART 9: POST-CONSTRUCTION SITE RUNOFF CONTROL PROGRAM

The Town of Elon operates a Post Construction Site Runoff Control Program that identifies the minimum elements to develop, implement and enforce a program to address stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that are located within the Town of Elon and discharge into the MS4. These elements are designed to minimize water quality impacts utilizing a combination of structural Stormwater Control Measures (SCMs) and/or non-structural BMPs appropriate for the community and ensure adequate long-term operation and maintenance of SCMs.

The Town's post construction ordinance is contained the Town Of Elon's Phase II Stormwater Post-Construction Ordinance. The Town maintains a stormwater design manual that is deemed equal or more stringent than the NC DEQ BMP Manual.

Table 19: Summary of Existing Post-Construction Program Elements

Permit Requirements for Plan Review and Approval	Municipal Ordinance/Code Reference(s) and/or Document Title(s)	Date Adopted
3.6.2(a) Authority	Phase II Stormwater Ordinance (Standalone)	July 1, 2007
3.6.3(a) & 15A NCAC 02H.0153(c) Federal, State & Local Projects	Phase II Stormwater Ordinance (Standalone)	July 1, 2007
3.6.3(b) Plan Review	Phase II Stormwater Ordinance (Standalone)	July 1, 2007
3.6.3(c) O&M Agreement	Phase II Stormwater Ordinance (Standalone)	July 1, 2007
3.6.3(d) O&M Plan	Phase II Stormwater Ordinance (Standalone)	July 1, 2007
3.6.3(e) Deed Restrictions/Covenants	Phase II Stormwater Ordinance (Standalone)	July 1, 2007
3.6.3(f) Access Easements	Phase II Stormwater Ordinance (Standalone)	July 1, 2007
Permit Requirements for Inspections and Enforcement	Municipal Ordinance/Code Reference(s) and/or Document Title(s)	Date Adopted
3.6.2(b) Documentation	Phase II Stormwater Ordinance (Standalone)	July 1, 2007
3.6.2(c) Right of Entry	Phase II Stormwater Ordinance (Standalone)	July 1, 2007
3.6.4(a) Pre-CO Inspections	Phase II Stormwater Ordinance (Standalone)	July 1, 2007
3.6.4(b) Compliance with Plans	Phase II Stormwater Ordinance (Standalone)	July 1, 2007
3.6.4(c) Annual SCM Inspections	Phase II Stormwater Ordinance (Standalone)	July 1, 2007
3.6.4(d) Low Density Inspections	Phase II Stormwater Ordinance (Standalone)	July 1, 2007
3.6.4(e) Qualified Professional	Phase II Stormwater Ordinance (Standalone)	July 1, 2007
Permit Requirements for Fecal Coliform Reduction	Municipal Ordinance/Code Reference(s) and/or Document Title(s)	Date Adopted
3.6.6(a) Pet Waste	N/A	
3.6.6(b) On-Site Domestic Wastewater Treatment	Not allowed	

The annual reporting metrics for the post construction program are provided in Table 20: Post Construction Site Runoff Control BMPs below.

Table 20: Post Construction Site Runoff Control BMPs				
Permit Ref.	3.6.5(a), 3.6.5(b), and 4.1.3: Minimum Post-Construction Reporting Requirements			
	Measures to document activities over the course of the fiscal year (July 1 – June 30) including appropriate information to accurately describe progress, status, and results.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
20.	Standard Reporting			
	Implement standardized tracking, documentation, inspections and reporting mechanisms to compile appropriate data for the annual self-assessment process. Data shall be provided for each Post-Construction/Qualifying Alternative Program being implemented as listed in Tables 18 and 19.	1. Track number of low density and high density plan reviews performed.	1. Continuously Permit Years 1-5	1. Number of plan reviews performed for low density and high density.
		2. Track number of low density and high density plans approved.	2. Continuously Permit Years 1-5	2. Number of plan approvals issued for low density and high density
		3. Maintain a current inventory of low density projects and constructed SCMs including SCM type or low density location and last inspection date.	3. Continuously Permit Years 1-5	3. Summary of number and type of SCMs added to the inventory; and number of low density projects constructed
		4. Track number of SCM inspections performed.	4. Continuously Permit Years 1-5	4. Number of SCM inspections.
		5. Track number and type of enforcement actions taken.	5. Continuously Permit Years 1-5	5. Number of enforcement actions issued.

Table 20: Post Construction Site Runoff Control BMPs

<p>Permit Ref.</p>	<p>3.6.2: Legal Authority Measures to maintain adequate legal authorities through ordinance or other regulatory mechanism to: (a) review designs and proposals for new development and redevelopment to determine whether adequate stormwater control measures will be installed, implemented, and maintained, (b) request information such as stormwater plans, inspection reports, monitoring results, and other information deemed necessary to evaluate compliance with the Post-Construction Stormwater Management Program, and (c) enter private property for the purpose of inspecting at reasonable times any facilities, equipment, practices, or operations related to stormwater discharges to determine whether there is compliance with the Post-Construction Stormwater Management Program.</p>			
<p>BMP No.</p>	<p>A</p>	<p>B</p>	<p>C</p>	<p>D</p>
	<p>Description of BMP</p>	<p>Measurable Goal(s)</p>	<p>Schedule for Implementation</p>	<p>Annual Reporting Metric</p>
<p>21.</p>	<p>Review the Post Construction Ordinance</p>			
	<p>Review the Post Construction Ordinance for compliance with NC DWQ guidance and local effectiveness. Phase II Post-Construction Ordinance will incorporate Jordan Lake Nutrient Strategy Regulations in conjunction with NC Session Law and DWQ regulations.</p>	<p>1. Add additional Measures as needed.</p>	<p>1. Permit Year 1</p>	<p>1. Yes/No</p>

Table 20: Post Construction Site Runoff Control BMPs

Permit Ref.	3.6.3: Plan Review and Approval Measures to maintain plan review and approval authority, standards and procedures to: (a) Require Federal, State, and local government projects to comply with Post-Construction Program requirements throughout the entire MS4 permitted area, unless the entity is subject to its own NPDES MS4 permit or a qualifying alternative program, (b) Conduct site plan reviews of all new development and redeveloped sites that disturb greater than or equal to one acre, and sites that disturb less than one acre that are part of a larger common plan of development or sale for compliance with 15A NCAC 02H .1017 and the qualifying alternative programs that apply within your jurisdiction, (c) Ensure that each project has an Operation and Maintenance Agreement that complies with 15A NCAC 02H .1050(12), (d) Ensure that each project has an Operation and Maintenance Plan that complies with 15A NCAC 02H .1050(13), (e) Ensure that each project has recorded deed restrictions and protective covenants, that require the project to be maintained consistent with approved plans, and (f) Ensure that each SCM and associated maintenance accesses be protected in a permanent recorded easement per 15A NCAC 02H 1050 (9) and (10).			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
22.	Review standards and policies that ensure structural BMPs continue to be in conformance with the state's Stormwater Management Design Manual			
	Review local standards to remain in compliance with the NC DWQ BMP Manual. Additional measures and techniques may be added to the local ordinance as they are investigated.	1. Add additional Measures as needed.	1. Annually Permit Years 1-5	1. Yes / No
23.	Review maintenance standards and inspection program to ensure that on-site controls continue to function as designed.			
	Review the maintenance standards and inspection program for local on-site controls.	1. Add additional Measures as needed.	1. Annually Permit Years 1-5	1. Yes / No
24.	Maintain the education program created for land developers and the public.			
	Provide educational materials and training for developers.	1. Maintain stormwater permitting guidance document for developers and designers.	1. Continuous Permit Years 1-5	1. Yes / No

Table 20: Post Construction Site Runoff Control BMPs

Permit Ref.	3.6.4: Inspections and Enforcement Measures to maintain inspection and enforcement authority, standards and procedures to: (a) Conduct post-construction inspections prior to issuing a Certificate of Occupancy or a Temporary Certificate of Occupancy. Alternatively, the project owner may provide a surety bond to guarantee compliance with the approved plan(s), (b) Ensure that the project has been constructed in accordance with the approved plan(s), (c) Ensure annual inspection of each permitted SCM to ensure compliance with the approved Operation and Maintenance Agreement, (d) Ensure inspection of low-density projects at least once during the permit term, and (e) Require that inspections be conducted by a qualified professional.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
25.	Inspections and long-term maintenance of Stormwater Control Measures (SCMs)			
	Maintain an inspection and maintenance plan for SCM's. Annual SCM Inspections performed by a qualified professional. SCM maintenance and inspections will be reviewed by the Town during the permit cycle.	1. Maintain and receive SCM inspection reports and follow up on the functioning status of SCM's.	1. Annually Permit Years 1-5	1. Report number of sites with SCMs 2. Report number of SCM inspections received 3. Report SCM enforcement activities
26.	Operation and Maintenance Plan			
	Require submittal of operation and maintenance plan(s) prior to certificate of occupancy and maintain records of each plan.	1. Require submittal of operation and maintenance plan(s) prior to certificate of occupancy and maintain records of each plan.	1. Continuously Permit Years 1-5	1. Report number of sites with newly approved operation and maintenance plan(s)

Table 20: Post Construction Site Runoff Control BMPs

Permit Ref.	3.6.6: Fecal Coliform Reduction Measures to control, to the maximum extent practicable, sources of fecal coliform per 15A NCAC 02H .1017(7). At a minimum, the program shall include: (a) A pet waste management component, which may be achieved by revising an existing litter ordinance, and (b) An on-site domestic wastewater treatment system component, if applicable, which may be coordinated with local county health department, to ensure proper operation and maintenance of such systems.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
27.	Pet Waste Stations at Parks			
	Provide Pet waste stations at Town owned parks as needed.	1. Maintain Pet Waste Stations in Town owned parks.	1. Continuously Permit Years 1-5	1. Report the number of Waste stations the Town maintains

PART 10: POLLUTION PREVENTION AND GOOD HOUSEKEEPING PROGRAMS

This SWMP provides a comprehensive pollution prevention and good housekeeping strategy for the Town of Elon municipal facilities and operations. Pollution prevention and good housekeeping is accomplished through the implementation of seven required programs, which collectively address the ultimate goal of preventing or reducing pollutant runoff from municipal operations such as parks and open space maintenance, fleet and building maintenance, new construction and land disturbances, and municipal storm sewer system maintenance.

Pollution prevention and good housekeeping for municipal operations includes the following programs:

1. Municipal Facilities Operation and Maintenance Program
2. Spill Response Program
3. MS4 Operation and Maintenance Program
4. Municipal SCM Operation and Maintenance Program
5. Pesticide, Herbicide and Fertilizer Management Program
6. Vehicle and Equipment Maintenance Program
7. Pavement Management Program

The Town of Elon will manage, implement and report the pollution prevention and good housekeeping BMPs as specified in Table 21 below for each required program.

Table 21: Pollution Prevention and Good Housekeeping BMPs				
Permit Ref.	3.7.1: Municipal Facilities Operation and Maintenance Program Measures to manage facilities that are owned and operated by the permittee and have the potential for generating polluted stormwater runoff. The permittee shall maintain a current inventory of municipal facilities; perform facility inspections and routine maintenance; establish specific frequencies, schedules, and standard documentation; provide staff training on general stormwater awareness and implementing pollution prevention and good housekeeping practices.			
BMP No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
28.	Maintain Inventory and O&M Manual of Municipal Facilities and Operations			
	Document and maintain municipal facility inspections program for sources of polluted runoff.	1. Maintain inventory of municipal facilities that are determined to be potential sources of polluted runoff.	1. Annually Permit Years 1-5	1. Total number of facilities
29.	Inspect Municipal Facilities and Operations for sources of polluted runoff.	1. Inspect Municipal Facilities and Operations.	1. Annually Permit Years 1-5	1. Report Number of facilities inspected

Permit Ref.	3.7.2: Spill Response Program Measures for facilities and operations that store and/or use materials that have the potential to contaminate stormwater runoff if spilled. The permittee shall maintain written spill response procedures and train staff on spill response procedures.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
30.	Spill Response Procedures			
	Maintain spill response procedures for municipal facilities and operations owned and operated by the permittee that have been determined by the permittee to have significant potential for generating polluted stormwater runoff.	1. Maintain City-wide spill and site-specific response procedures.	1. Annually Permit Years 1-5	1. Yes / No
31.	Staff Training			
	Train Staff on proper procedures and protocol to handle spills.	1. Conduct employee training and document attendance.	1. Annually Permit Years 1-5	1. Number of staff who completed PPGH training
Permit Ref.	3.7.3: MS4 Operation and Maintenance Program Measures to minimize pollutants in the stormwater collection system. The permittee shall provide operation and maintenance staff training on stormwater awareness and pollution prevention, perform MS4 inspections, maintain the collection system including catch basins and conveyances; and establish specific frequencies, schedules, and standard documentation.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
32.	O&M for municipally owned or maintained catch basins and conveyance systems			
	Continue to implement/and maintain the O&M Program for the municipal storm sewer system including catch basins, and the conveyance system.	1. Inspect and maintain MS4 to verify they function as conduits of stormwater.	1. Annually Permit Years 1-5	1. Yes / No
		2. Review the MS4 Plan, and revise, if necessary. Implement inspection and maintenance programs documented in the MS4 Plan.	2. Annually Permit Years 1-5	2. Yes / No.

Permit Ref.	3.7.4: Municipal SCM Operation and Maintenance Program			
	Measures to manage municipally owned, operated, and/or maintained structural <u>stormwater control measures (SCMs)</u> that are installed for compliance with the permittee’s post-construction program. The permittee shall maintain a current inventory of SCMs, perform SCM inspections and maintenance, and shall establish specific frequencies, schedules, and documentation.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
33.	O&M for municipally owned or maintained structural stormwater controls			
	Develop and maintain an O&M program for all municipally owned SCMs.	1. Create a municipal SCM Inventory.	1. Annually Permit Years 1-5	1. Report number of municipal SCMs
		2. Inspect and maintain SCMs so that they function as designed.	2. Annually Permit Years 1-5	2. Report number of municipal SCMs inspected
Permit Ref.	3.7.5: Pesticide, Herbicide and Fertilizer Management Program			
	Measures to minimize water quality impacts from the use of landscape chemicals. The permittee shall provide routine pollution prevention and chemical use, storage and handling training, and shall ensure compliance with permits and applicator certifications.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
34.	Pesticide, Herbicide and Fertilizer Application Management			
	Manage Staff Pesticide license and follow all requirements to safely handle and apply pesticides, herbicides, and fertilizers.	1. Review staff license that they are up to date.	1. Annually Permit Years 1-5	1. Report number of staff with license
		2. Provide training for staff on the use of chemicals.	2. Annually Permit Years 1-5	2. Report number of staff that attended training and type of training
Permit Ref.	3.7.6: Vehicle and Equipment Maintenance Program			
	Measures to prevent and minimize contamination of stormwater runoff from areas used for municipal vehicle and equipment maintenance and/or cleaning. The permittee shall ensure that municipal industrial facilities subject to NPDES industrial permitting comply with those permit requirements, provide routine pollution prevention training to staff, perform routine inspections, and establish specific frequencies, schedules, and documentation.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
35.	Vehicle Washing and Maintenance Program			
	Document and maintain procedures to prevent or minimize contamination of stormwater runoff from all areas used for vehicle and equipment cleaning	1. Review procedures for vehicle and equipment cleaning operations and update, if necessary.	1. Annually Permit Years 1-5	1. Yes / No

Permit Ref.	3.7.7: Pavement Management Program Measures to reduce pollutants in stormwater runoff from municipally owned streets, roads, and parking lots within the permittee's corporate limits. The permittee shall implement measures to control litter, leaves, debris, particulate and fluid pollutants associated with vehicles, and establish specific frequencies, schedules, and documentation.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
36.	Streets, Roads, and Public Parking Lots Maintenance Program			
	Implement and maintain street sweeping program to reduce polluted stormwater runoff from municipally owned streets, roads, and public parking lots within the city as fiscally feasible .	1. Evaluate options to implement BMPs to reduce polluted stormwater runoff from municipally owned streets, roads, and public parking lots. Factors for evaluation are water quality benefits, technical feasibility, safety, and fiscal responsibility.	1. Permit Year 1	1. Yes / No
		2. Create and maintain street sweeping program for reducing polluted stormwater runoff from municipally owned streets, roads, and public parking lots.	2. Quarterly Permit Years 2 and 5	2. Cubic Yards of Debris & Pollutant Collected or miles swept