# Stormwater Management Plan Town of Woodfin NCS000440

March, 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 Woodfin 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 Woodfin 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 NCS000440, 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 Woodfin and located within the corporate limits of the Town of Woodfin.

In preparing this SWMP, the Town of Woodfin has evaluated its MS4 and the permit requirements to develop a 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.

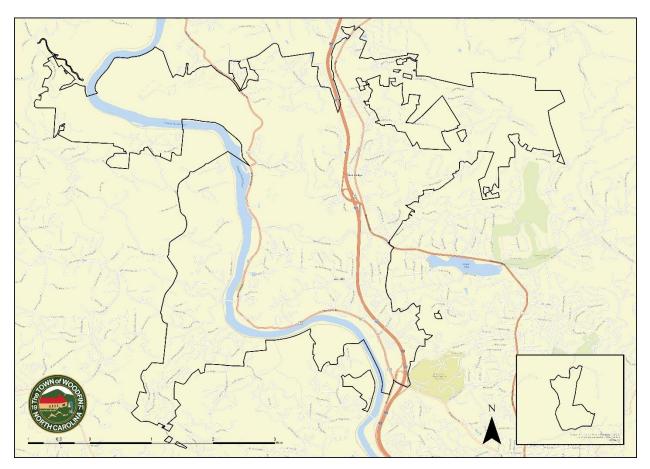
- $\Box$  I am a ranking elected official.
- □ I am a principal executive officer for the permitted MS4.
- □ I am a duly authorized representative for the permitted MS4 and have attached the authorization made in writing by a principal executive officer or ranking elected official which specifies me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

Signature:	
Print	
Name:	
Title:	
Signed this	day of 20

### PART 3: MS4 INFORMATION

#### 3.1 Permitted MS4 Area

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



#### 3.2 Existing MS4 Mapping

The current MS4 mapping includes inlets and catch basins, pipes with flow direction, outfalls and receiving waters. Major outfalls are identified in a separate data layer. Information such as material, depth, diameter, and condition are also recorded, and a photo is linked to inlets and outfalls.

Table 1:	Summary of	f Current	MS4	Mapping

Percent of MS4 Area Mapped	100	%
No. of Major Outfalls* Mapped	Unknown**	Total

\*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  $\geq$  2-acres.

\*\*Outfalls have been mapped but the classification of specific outfalls as major outfalls has not occurred, therefore, the number of major outfalls is unknown at this time

# 3.3 Receiving Waters

The Town of Woodfin MS4 is located within the French Broad 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:

- o <u>Waterbody Classification Map</u>
- o Impaired Waters and TMDL Map
- Most recent NCDEQ Final <u>303(d) List</u>

Table 2: S	Summary (	of MS4	Receiving	Waters
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Receiving Water Name	Stream Index / AU	Water Quality	303(d) Listed Parameter(s) of Interest
	Number	Classification	
French Broad River	6-(54.75)c	В	
	6-(54.75)d		
Beaverdam Creek	6-82	С	

#### 3.4 MS4 Interconnection

The Town of Woodfin MS4 is not interconnected with another regulated MS4 and directly discharges to the receiving waters as listed in Table 2 above.

The MS4 does interconnect with the statewide NCDOT MS4 and includes:

- a. The interconnection is receiving stormwater from the NCDOT MS4. The number of interconnections is unknown.
- b. The interconnection is not discharging stormwater into the NCDOT MS4.
- c. The Town of Woodfin MS4 mapping does identify interconnections with the NCDOT MS4.
- d. The Town of Woodfin MS4 mapping does not include NCDOT MS4 outfalls. Currently, we have only been able to acquire the NCDOT inlets.

### 3.5 Total Maximum Daily Loads (TMDLs)

No total maximum daily loads have been established in the MS4, as determined by the map and list provided on the <u>NCDEQ Modeling & Assessment Unit</u> web page. There is a statewide TMDL for mercury; however, the French Broad River Basin was not an area of concern. The following link provides additional information on the <u>NC Statewide Mercury TMDL</u> web page.

# 3.6 Endangered and Threatened Species and Critical Habitat

Significant populations of threatened or endangered species and/or critical habitat are identified within the regulated MS4 urbanized area. Based upon a review of the <u>Endangered and Threatened Species and</u> <u>Species of Concern by County for North Carolina Map</u> and <u>Listed species believe to or known to occur in</u> <u>North Carolina map</u> as provided by the <u>U.S. Fish and Wildlife Service, the species listed in Table 4 have</u> 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.

Scientific Name	Common name	Species Group	Federal Listing Status
Alasmidonta raveneliana	Appalachian elktoe	Invertebrate	E
Clemmys muhlenbergii	bog turtle	Reptile	Т
Glaucomys sabrinus coloratus	Carolina northern flying squirrel	Mammal	E
Myotis grisescens	Gray bat	Mammal	Е
Sarracenia jonesii	Mountain sweet pitcher-plant	Vascular Plant	Е
Myotis septentrionalis	Northern Long-Eared Bat	Mammal	Т

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

# 3.7 Industrial Facility Discharges

The Town of Woodfin MS4 jurisdictional area includes the following industrial facilities which hold NPDES Industrial Stormwater Permits, as determined from the <u>NCDEQ Maps & Permit Data web page</u>.

Table 5: NPDES Stormwater Permitted Industrial Facilities				
Permit Number	Facility Name			
NCG050238	Silver Line Plastics LLC			
NCG080661	Republic Services of North Carolina LLC			
NCG110158	Metropolitan Sewerage District of Buncombe County			
NCG030134	Thermo Fisher Scientific LLC			

 Table 5:
 NPDES Stormwater Permitted Industrial Facilities

#### 3.8 Non-Stormwater Discharges

The water quality impacts of non-stormwater discharges have been evaluated by the Town of Woodfin as summarized in Table 6 below. The unpermitted non-stormwater flows listed as incidental do not significantly impact water quality. The Town of Woodfin 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 Woodfin.

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 Woodfin to determine whether they may significantly impact water quality. According to the 2020 Integrated Report, the portions of the French Broad River receiving discharges from the MS4 are meeting water quality criteria for parameters such as pH and dissolved oxygen, which indicates that there is not an issue with detergent runoff.

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
Flows from firefighting activities	Incidental

 Table 6:
 Non-Stormwater Discharges

#### 3.9 Target Pollutants and Sources

In addition to those target pollutants identified above, the Town of Woodfin is aware of a significant water quality issue within the permitted MS4 area. Newfound Creek, which flows through the northwest corner of the town's municipal boundary on the west side of the French Broad River, is on the 303d list for fecal coliform. However, the town's stormwater system does not cover this area, and the impairment is largely due to agricultural runoff in the Newfound Valley of Buncombe County.

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 Woodfin has evaluated schools, homeowners and businesses as target audiences that are likely to have significant stormwater impacts.

The target audiences, as shown in Table 7 were identified due to the potential for these entities to contribute to pollutants and because they are the groups that have probable ability to affect positive change.

Target Pollutant(s)	Likely Source(s)/Target Audience(s)	SWMP Program Addressing Target
		Pollutant(s)/Audience(s)
Litter	Residents, Businesses, Schools	Public Education & Outreach, Public
		Involvement & Participation
Lawn Care Activities	Residents, Businesses, Schools, public	Public Education & Outreach, Public
	employees (Parks and ROW	Involvement & Participation,
	maintenance)	Pollution Prevention & Good
		Housekeeping
Illicit Discharges	Residents, Businesses, Industrial,	Public Education & Outreach, Public
	public employees	Involvement & Participation, Illicit
		Discharge Detection & Elimination
		(IDDE)
Sediment	Construction Sites	Construction Site Runoff Control,
		Post-Construction Site Runoff
		Control
Illegal Dumping	Residents, Businesses, Industrial,	Public Education & Outreach,
	public employees	Pollution Prevention & Good
		Housekeeping
Improper Disposal of	Residents, Businesses, Industrial,	Public Education & Outreach,
Waste	public employees	Pollution Prevention & Good
		Housekeeping

Table 7: Summary of Target Pollutants and Sources

# PART 4: STORMWATER MANAGEMENT PROGRAM ADMINISTRATION

#### 4.1 Organizational Structure

The Facilities Department will oversee the implementation of the stormwater program and permit compliance and will coordinate and manage the SWMP. In addition, the Town of Woodfin is partnering with Buncombe County Sedimentation and Erosion Department to oversee Construction Site Run-off Control.

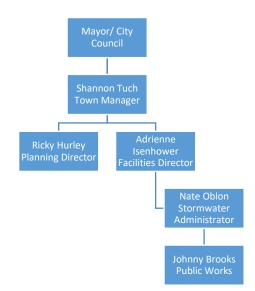


Table 8: Summary of Responsible Parties

SWMP Component	<b>Responsible Position</b>	Staff Name	Department
Stormwater Program Administration	Stormwater Administrator	Nate Oblon	Planning/ Stormwater
SWMP Management	Stormwater Administrator	Nate Oblon	Planning/ Stormwater
Public Education & Outreach	Stormwater Administrator	Nate Oblon	Planning/ Stormwater
Public Involvement & Participation	Stormwater Administrator	Nate Oblon	Planning/ Stormwater
Illicit Discharge Detection & Elimination	Stormwater Administrator	Nate Oblon	Planning/ Stormwater
Construction Site Runoff Control	Buncombe County Erosion Control Officer	James Guess	Planning & Development

Post-Construction Stormwater Management	Stormwater Administrator	Nate Oblon	Planning/ Stormwater
Pollution Prevention/Good Housekeeping for Municipal Operations	Stormwater Administrator	Nate Oblon	Planning/ Stormwater
Municipal Facilities Operation & Maintenance Program	Public Works Director	Johnny Brooks	Public Works
Spill Response Program	Stormwater Administrator	Nate Oblon	Planning/ Stormwater
MS4 Operation & Maintenance Program	Stormwater Administrator	Nate Oblon	Planning/ Stormwater
Municipal SCM Operation & Maintenance Program	Stormwater Administrator	Nate Oblon	Planning/ Stormwater
Pesticide, Herbicide & Fertilizer Management Program	Stormwater Administrator	Nate Oblon	Planning/ Stormwater
Vehicle & Equipment Cleaning Program	Public Works Director	Johnny Brooks	Public Works
Pavement Management Program	Project & Facilities Director	Adrienne Isenhower	Projects & Facilities
Total Maximum Daily Load (TMDL) Requirements	N/A		

#### 4.2 **Program Funding and Budget**

In accordance with the issued permit, the Town of Woodfin 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 stormwater program is funded through a stormwater utility fee for all program requirements (\$407,000 for FY25). The fee was implemented in FY24 as a stand-alone fee, but during the initial cycle

state legislation was passed to allow for collection through property tax billing. The existing fee is a tiered flat fee for residential uses and a per ERU fee for commercial uses. Staff continues to monitor the existing fee structure and available impervious surface data for necessary amendments to the fee structure to ensure fairness to town residents while maintaining compliance with MS4 Permit requirements.

# 4.3 Shared Responsibility

The Town of Woodfin will share the responsibility to implement the following minimum control measures, which are at least as stringent as the corresponding NPDES MS4 Permit requirement. The Town of Woodfin remains responsible for compliance if the other entity fails to perform the permit obligation, and may be subject to enforcement action if neither the Town of Woodfin nor the other entity fully performs the permit obligation. Table 9 below summarizes who will be implementing the component, what the component program is called, the specific SWMP BMP or permit requirement that is being met by the shared responsibility, and whether or not a legal agreement to share responsibility is in place.

Table 9:	Shared Responsibilities	8

SWMP BMP or Permit Requirement	Implementing Entity & Program Name	Legal Agreement (Y/N)
3.5 Construction Site Runoff	Buncombe County Erosion and Sediment Control	Ν
Control Program		
3.6.6 On-Site Domestic	Buncombe County Health Department	N/A
Wastewater Treatment		

#### 4.4 Co-Permittees

The are no other entities applying for co-permittee status under the NPDES MS4 permit number NCS000440 for the Town of Woodfin. Table 10 summarizes contact information for each co-permittee.

Table 10: Co-Permittee Contact Information

Co-Permittee MS4	Contact Person	Phone & E-Mail	Interlocal
Name			Agreement
			(Y/N)
N/A			

#### 4.5 Measurable Goals for Program Administration

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

Table 1	1: Program Administration BMPs					
Permit Ref.	<b>2.1.2 Program Implementation</b> 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.					
BMP	Α	В	С	D		
No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric		
1.	Minimum Control Measures					
	Written programs will be created to assure compliance with part 2.2.2 of the MS4 Permit. Written programs shall be reviewed on an annual basis	1. Develop and maintain written programs for all minimum control measures.	1. Permit Year 1	1. Yes/No		
	and modified if needed to best outline the program and needs of the municipality.	2. Review written programs and modify/update.	2. Annually	2. Yes/No		
2.	Funding and Staffing					
	The funding and staffing status of the program will be evaluated by appropriate Town staff to confirm that the program is meeting permit requirements.	1. Work with other town officials to determine if revenue from the stormwater utility fee is adequate to fund all requirements of the MS4 Permit/SWMP.	1. Annually	1. Adequate/inadequate		

Table 1	Table 11: Program Administration BMPs						
Permit Ref.	<b>1.6: Permit Renewal Application</b> Measures to submit a permit renewal application no later than 180 days prior to the expiration date of the NPDES MS4 permit.						
BMP	Α	В	С	D			
No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric			
3.	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			
		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			

#### PART 5: PUBLIC EDUCATION AND OUTREACH PROGRAM

The Town of Woodfin 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 Woodfin is required to inform businesses and the general public of the hazards associated with illicit discharges, illegal dumping and improper disposal of waste.

Target Pollutants/Sources	Target Audience(s)
Litter	General Public, Residents, Businesses, Schools
Yard Waste	Residents, Businesses, Schools
Illicit Discharges	Residents, Businesses, Industrial, Public Employees
Sediment	Construction Sites
Illegal Dumping	Residents, Businesses, Industrial, Public Employees
Improper Disposal of Waste	Residents, Businesses, Industrial, Public Employees

Table 12:	Summary of Target Pollutants & Audiences
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The Town of Woodfin will manage, implement and report the following public education and outreach BMPs.

Table 13	Table 13: Public Education and Outreach BMPs					
Permit Ref.	<b>3.2.2 and 3.2.4: Outreach to Targeted Audiences</b> Measures to identify the specific elements and implementation of a Public Education and Outreach Program to share educational materials to the community or conduct equivalent outreach activities about the impacts of stormwater discharges on water bodies and how the public can reduce pollutants in stormwater runoff. The permittee shall provide educational information to identified target audiences on pollutants/sources identified in table 12 above; and shall document the extent of exposure of each media, event or activity, including those elements implemented locally or through a cooperative agreement.					
BMP	A B C D					
No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric		
4.	Update Literature					
	The Town will evaluate their current handout and, if necessary, create an updated brochure that can be used throughout the permit period. Key placement of brochures will be	1. Inventory current literature. Evaluate whether current literature is appropriate for use and if not create and have printed new materials.	1. Permit Year 1.	1. Yes/No/Status		

	determined and distributed at Town	2. Place literature in key	2. Permit Years 1-5.	2. Yes/No/Status
	Hall.	locations at the Town Hall facility. Replace monthly.		
5.	Participate in a Public Event			
	The Town will pass out general stormwater awareness literature at a minimum at one public event lead by	1. Man a booth at one public event to distribute literature.	1. Permit Years 2-5.	1. Total number of hours with booth manned
	the Town and display informative information related to stormwater.	2. For the events, create a display and/or other visual materials with specific information about pollutants of concern such as litter, nutrients, non-point source pollution, waste disposal. Include <i>how to help</i> material pertaining	2. Permit Year 2.	2. Total number of pieces of literature handed out
Pormit	217 323 and 365(a): Wab Site	to the target audience(s).		
Permit Ref.	<b>2.1.7, 3.2.3 and 3.6.5(c): Web Site</b> Measures to provide a web site desi including ordinances, or other regul mechanisms, providing the legal au and SWMP. The web page shall als design standards, checklists and/or o	to the target audience(s). gned to convey the progra atory mechanisms, or a lis thority necessary to imple so provide developers with	st identifying the ordinar ment and enforce the rec	nces or other regulatory quirements of the permit
Ref.	Measures to provide a web site desi including ordinances, or other regul mechanisms, providing the legal au and SWMP. The web page shall also	to the target audience(s). gned to convey the progra atory mechanisms, or a lis thority necessary to imple so provide developers with	st identifying the ordinar ment and enforce the rec	nces or other regulatory quirements of the permit
	Measures to provide a web site desi including ordinances, or other regul mechanisms, providing the legal au and SWMP. The web page shall als design standards, checklists and/or o	to the target audience(s). gned to convey the progra atory mechanisms, or a lis thority necessary to imple so provide developers with other materials.	st identifying the ordinar ment and enforce the rec a all relevant post-constr C Schedule for	nces or other regulatory quirements of the permit ruction requirements,
Ref.	Measures to provide a web site desi including ordinances, or other regul mechanisms, providing the legal au and SWMP. The web page shall als design standards, checklists and/or A	to the target audience(s). gned to convey the progra atory mechanisms, or a lis thority necessary to imple so provide developers with other materials. B Measurable Goal(s)	st identifying the ordinar ment and enforce the rec a all relevant post-constr C	nces or other regulatory         quirements of the permit         ruction requirements,         D         Annual Reporting
Ref. BMP No.	Measures to provide a web site desi including ordinances, or other regul mechanisms, providing the legal au and SWMP. The web page shall als design standards, checklists and/or of A Description of BMP Stormwater Page on the Town's Web Maintain a webpage designed to provide information regarding the	to the target audience(s). gned to convey the progra atory mechanisms, or a lis thority necessary to imple so provide developers with other materials. B Measurable Goal(s)	st identifying the ordinar ment and enforce the rec a all relevant post-constr C Schedule for	nces or other regulatory         quirements of the permit         ruction requirements,         D         Annual Reporting
Ref. BMP No.	Measures to provide a web site desi including ordinances, or other regul mechanisms, providing the legal au and SWMP. The web page shall als design standards, checklists and/or A Description of BMP Stormwater Page on the Town's Web Maintain a webpage designed to	to the target audience(s). gned to convey the progra atory mechanisms, or a lis thority necessary to imple so provide developers with other materials. B Measurable Goal(s) osite 1. Maintain functional	st identifying the ordinar ment and enforce the rec a all relevant post-constr C Schedule for Implementation 1. Annually	nces or other regulatory quirements of the permit ruction requirements,         D         Annual Reporting Metric

Table 1	ole 13: Public Education and Outreach BMPs					
Permit Ref.	<b>3.2.5: Stormwater Hotline</b> Measures for a stormwater hotline/helpline for the purpose of public education and outreach.					
BMP	Α	В	С	D		
No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric		
7.	Advertise the Stormwater Hotline					
	Provide the hotline number and reporting protocol to the general public and business community.	1. Provide the hotline and pertinent information on the Stormwater Web page and in all new stormwater literature.	1. Permit Years 1-5.	1. Yes/No/Status		
8.	Train Hotline Staff					
	Train staff on SOP to direct hotline calls to appropriate responders.	1. Develop SOP for managing hotline calls.	1. Permit Year 1.	1. Yes/No/Status		
		2. Train prominent front desk and public works staff on SOP.	2. Permit Years 1-5.	2. Number trained		

# 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 Woodfin will manage, implement and report the following public involvement and participation BMPs.

Permit Ref.	<b>3.3.1: Public Input</b> Mechanisms for public involvement that provide for input on stormwater issues and the stormwater program.					
BMP	A B		С	D		
No.	Description of BMP	Measurable Goal	(s)	Schedule for Implementation	Annual Reporting Metric	
9.	Town Meetings					
	Stormwater issues and program implementation items will be brought to the Town Council. Citizens can provide input.	1. Meeting to be held annually.	1	1. Permit Years 1-5.	1. Yes/No/Status	
10.	Stormwater Website Page					
	Provide a contact person and e-mail address for citizen's questions related	1. Add contact to To website.	wn	1. Permit Year 1.	1. Yes/No/Status	
	to stormwater on the Stormwater website page. Provide a link to the Town's MS4 mapping for availability to the public.	2. Inform relevant To departments about the protocol.		2. Permit Year 1.	2. Yes/No/Status	
		3. Provide a link to a Town's MS4 mapping		3. Permit Year 1.	3. Yes/No/Status	
11.	Stormwater Update in Biannual New	sletter				
	Insert stormwater update in town- wide biannual newsletter	1. Develop insert for newsletter.	1. Pe	ermit Year 1-5.	1. Yes/No/Status	
		2. Include in mailer and provide to public.	2. Pe	ermit Year 1-5.	2. Number of mailers	

Permit Ref.	<b>3.3.2: Volunteer Opportunities</b> Measures to provide volunteer opportunities designed to promote ongoing citizen participation.					
BMP	Α	В	С	D		
No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric		
12.	Create a Town Park and Riverbank	Clean-up Day Along Frenc	h Broad River			
	Create and implement a Town Park and Riverbank Clean-up Day Event.	1. Plan an annual clean- up day for one of the Town's Parks adjacent to the French Broad River. Decide how it will be advertised, who will run it, and what equipment is needed.	1. Permit Year 2.	1. Yes/No/Status		
		2. Implement Town Park and River Clean-up Day.	2. Permit Years 3-5.	2. Date of event and number of participants		

# PART 7: ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM

The Town of Woodfin 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.

Permit	3.4.1: MS4 Map			
Ref.	Measures to develop, update and m conveyances, flow direction, major			
BMP	A	В	С	D
No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
13.	MS4 Major Outfalls and Municipal S	Storm Sewer System Map		
	Create municipal storm sewer system map. Map to include inlets, pipes	1. Create MS4 map.	1. Permit Year 1.	1. Yes/No/Status
	flow directions, major outfalls and streams.	2. Publish map online and link on stormwater page.	2. Permit Year 1.	2. Yes/No/Status
		3. Update MS4 map	3. Permit Years 1-4.	3. Yes/No/Status
		annually.		5. 105/110/54adas
	<b>3.4.2: Regulatory Mechanism</b> Measures to provide an IDDE ordir prohibit, detect, and eliminate illicit including enforcement procedures a	ance or other regulatory r		legal authority to
Ref.	Measures to provide an IDDE ordin prohibit, detect, and eliminate illicit	ance or other regulatory r		legal authority to
Ref. BMP	Measures to provide an IDDE ordin prohibit, detect, and eliminate illicit including enforcement procedures a	ance or other regulatory r connections and discharg and actions.	ges, illegal dumping and	legal authority to spills into the MS4,
Permit Ref. BMP No. 14.	Measures to provide an IDDE ordin prohibit, detect, and eliminate illicit including enforcement procedures a A	ance or other regulatory r connections and discharg and actions. B	ges, illegal dumping and C Schedule for	legal authority to spills into the MS4, D Annual Reporting

Table 1	5: Illicit Discharge Detection and H	Elimination BMPs				
Permit Ref.	<b>3.4.3: IDDE Plan</b> 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:					
	a) Locate priority	areas likely to have illici	t discharges,			
	b) Conduct routin	e dry weather outfall insp	pections,			
	c) Identify illicit	discharges and trace source	ces,			
	d) Eliminate the s	ource(s) of an illicit disch	arge, and			
	e) Evaluate and a	ssess the IDDE Program.				
BMP	Α	В	С	D		
No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric		
15.	Major Outfall Inspections					
	Preform regular dry weather (no rain in previous 72 hours) outfall inspections to proactively identify illicit discharges and illicit connections.	1. Determine number of major outfalls.	1. Permit Year 1.	1. Total number of major outfalls in system.		
		2. Determine number of non-major outfalls.	2. Permit Year 1.	2. Total number of non- major outfalls		
		3. Inspect one group of outfalls annually in dry weather conditions and document any potential violations.	3. Permit Years 2-5.	3. Yes/No/Status		
		4. Inspect one-quarter major outfalls annually.	4. Permit Years 2-5.	4. Percent major outfalls inspected.		
		5. Inspect one-quarter non-major outfalls annually.	5. Permit Years 2-5.	5. Yes/No/Status		
16.	Illicit Discharge Identification Procedure					
	Yearly evaluation of IDDE program to promote continuance of effective components and improvement in the areas that are lacking, as well as,	1. Evaluation meeting with IDDE program stakeholders	1. Annually Permit Years 1-5.	1. Yes/No/Status		

	identification of potential "hot-spot" areas.	2. Review of IDDE reports and identification of chronic violators issues and/or "hot-spot"	2. Permit Years 2-5.	2. Yes/No/Status
		areas.		
Permit	3.4.4: IDDE Tracking			
Ref.	Measures for tracking and documen observed, the results of the investig closed, the issuance of enforcement	ation, any follow-up of th	e investigation, the date	the investigation was
BMP	A	B	C	D
BMP No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
17.	Track all known illicit discharge, illi	cit connection and illegal d	umping events	·
	Create a tracking mechanism for documenting where illegal activities took place, what was done to inform the violator, records of all correspondence, records of all	1. Develop tracking spreadsheet to collect data from "Potential Illicit Discharge Report."	1. Permit Year 1.	1. Yes/No/Status
	activities related to the illegal activity and final resolutions.	2. Perform IDDE inspections using the reporting form.	2. Permit Years 2-5.	2. IDDE reporting metrics: Number of illici reports, Number of investigations, Number of NOVs issued, Number of NOVs resolved, Number of enforcement actions taken
Permit Ref.	<b>3.4.5: Staff IDDE Training</b> Measures to provide training for me responsibilities, may observe an illi include how to identify and report i training event shall be documented.	cit discharge, illicit conne llicit discharges, illicit con	ction, illegal dumping o nnections, illegal dumping	r spills. Training shall ng and spills. Each staff
BMP	Α	В	C	D

Table 1	5: Illicit Discharge Detection and H	Elimination BMPs				
	Create SOP and Town staff in how to identify and report stormwater issues, illicit discharges, illegal dumping, etc. Include IDDE procedures and hotline protocol.	1. Create SOP for town staff to identify IDDE issues, illicit discharges, and illegal dumping.	1. Permit Year 2	2. Yes/No/Status		
		2. Train town staff in IDDE reporting procedures	2. Permit Year 2 and new employees within first year hired.	3. Number of staff trained		
Permit Ref.	<b>3.4.6: IDDE Reporting</b> Measures for the public and staff to publicized to facilitate reporting and personnel.					
BMP	A	В	С	D		
No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric		
19.	Stormwater Hotline					
	A Stormwater Hotline will be maintained for Town's residents and businesses to report stormwater issues and illicit discharges, illegal dumping, and spills. The hotline number will be available on the Town's Website and in educational literature.	1. Provide the hotline and pertinent information on the Stormwater Web page and in all new stormwater literature.	1. Permit Years 1-5.	1. Yes/No/Status		
20.	Illicit Discharge Reporting System	·		·		
	Develop a reporting form to record the location, date and nature of the illicit discharge, illegal dumping, and/or spills.	3. Create an illicit discharge reporting form that can be used by the appropriate municipal departments for tracking of all activities related to the IDDE.	2. Permit Year 1.	1. Yes/No/Status		

#### PART 8: CONSTRUCTION SITE RUNOFF CONTROL PROGRAM

In accordance with 15A NCAC 02H .0153, the Town of Woodfin 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.

Table 16: Qualifying Alternative Program Components for Construction Site Runoff Control Program

Permit Reference	State or Local Program Name	Legal Authority	Implementing Entity
3.5.1 - 3.5.4	Buncombe County Delegated SPCA Program*	15A NCAC Chapter 04, NCDEQ Approved Delegation, Interlocal Agreement/Joint Resolution, Local Ordinance	Buncombe County

\* The local delegated SPCA Program ordinance(s)/regulatory mechanism(s) can be found at: <u>https://www.buncombecounty.org/common/planning/ordinance-erosion-control.pdf</u>

The Town of Woodfin also implements the following BMPs to meet NPDES MS4 Permit requirements.

Table 17	Table 17: Construction Site Runoff Control BMPs					
Permit Ref.	<b>3.5.6: Public Input</b> Measures to provide and promote a means for the public to notify the appropriate authorities of observed erosion and sedimentation problems.					
BMP	Α	В	С	D		
No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric		
21.	Municipal Staff Training					
	Train municipal staff who receive calls from the public on the protocols for referral 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		
22.	Promote NCDEQ Hotline					
	Promote NCDEQ hotline 1-866- STOPMUD	1. Maintain STOPMUD hotline number on the stormwater webpage.	1. Annually, Permit Years 1-5.	1. Yes/No/Status		
		2. Promote hotline on City social media	2. Annually, Permit Years 1-5.	1. Yes/No/Status		

Table 1	Table 17: Construction Site Runoff Control BMPs					
Permit Ref.	<b>3.5.5: Waste Management</b> 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.					
BMP	Α	В	С	D		
No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric		
23.	Ordinance for Waste Management					
	Develop and implement an ordinance to require construction site operators	1. Develop and adopt ordinance.	1. Permit Year 2.	1. Yes/No/Status		
	to control waste.	2. Maintain legal authority	2. Permit Year 2-5.	2. Yes/No/Status		
24.	Waste Management Information Materials					
	Develop information materials for contractors to address waste management on construction sites.	1. Create document that can be provided to building permit applicants and referenced on the Town's website.	1. Permit Year 3.	1. Yes/No/Status		

#### PART 9: POST-CONSTRUCTION SITE RUNOFF CONTROL PROGRAM

This SWMP 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 Woodfin 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.

In accordance with 15A NCAC 02H .0153 and .1017, the Town of Woodfin implements the following State post-construction program requirements, which satisfy the NPDES Phase II MS4 post-construction site runoff control requirements as Qualifying Alternative Programs (QAPs) in the MS4 area(s) where they are implemented.

Table 18: Qualifying Alternative Program(s) for Post-Construction Site Runoff Control Program

State QAF	P Name	State Requirements	Local Ordinance / Regulatory Mechanism Reference
None		N/A	N/A

The Town of Woodfin has existing requirements other than Qualifying Alternative Program(s) for implementation of the NPDES Phase II MS4 post-construction program requirements. These existing requirements are codified in local ordinance(s), and implementation is further defined in guidance, manuals and/or standard operating procedure(s) as summarized in Table 19 below.

Permit Requirements for	Municipal Ordinance/Code Reference(s)	Date Adopted
Plan Review and Approval	and/or Document Title(s)	•
3.6.2(a) Authority	Sec. 41-23	2/23/23
3.6.3(a) & 15A NCAC 02H.0153(c)	Sec. 41-11	2/23/23
Federal, State & Local Projects		
3.6.3(b) Plan Review	Sec. 41-11	2/23/23
3.6.3(c) O&M Agreement	Sec. 41-11	2/23/23
3.6.3(d) O&M Plan	Sec. 41-11	2/23/23
3.6.3(e) Deed	Sec. 41-13	2/23/23
Restrictions/Covenants		
3.6.3(f) Access Easements	Sec. 41-15	2/23/23
Permit Requirements for	Municipal Ordinance/Code Reference(s)	Date Adopted
Inspections and Enforcement	and/or Document Title(s)	
3.6.2(b) Documentation	Sec. 41-14	2/23/23
3.6.2(c) Right of Entry	Sec. 41-41, Sec. 41-18	2/23/23
3.6.4(a) Pre-CO Inspections	Sec. 41-11, Sec. 41-17, Sec. 41-24, Sec. 41-25	2/23/23
3.6.4(b) Compliance with Plans	Sec. 41-11, Sec. 41-21	2/23/23
3.6.4(c) Annual SCM Inspections	Sec. 41-17	2/23/23
3.6.4(d) Low Density Inspections	None	N/A
3.6.4(e) Qualified Professional	Sec. 41-17	2/23/23
Permit Requirements for	Municipal Ordinance/Code Reference(s)	Date Adopted
Fecal Coliform Reduction	and/or Document Title(s)	
3.6.6(a) Pet Waste	None	N/A
3.6.6(b) On-Site Domestic	Buncombe County Health Department	N/A
Wastewater Treatment	Environmental Health Services	

 Table 19:
 Summary of Existing Post-Construction Program Elements

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.	<b>3.6.5(a)</b> , <b>3.6.5(b)</b> , and <b>4.1.3:</b> 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	D					
No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric		
25.	Standard Reporting					
	Implement standardized tracking, documentation, inspections and reporting mechanisms to compile appropriate data for the annual self-	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.		

Table 2	0: Post Construction Site Runoff C	ontrol BMPs		
	assessment process. Data shall be provided for each Post-Construction/ Qualifying Alternative Program	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.
	being implemented as listed in Tables 18 and 19.	3. Maintain a current inventory of low density projects and constructed SCMs including SCM type or low density acreage, 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 and acreage of low density projects constructed.
		<ul><li>4. Track number of SCM inspections performed.</li><li>5. Track number of low density inspections performed.</li></ul>	<ul><li>4. Continuously Permit Years 1-5</li><li>5. Continuously Permit Years 1-5</li></ul>	<ol> <li>4. Number of SCM inspections.</li> <li>5. Number of low density projects inspected.</li> </ol>
		6. Track number and type of enforcement actions taken.	6. Continuously Permit Years 1-5	6. Number of enforcement actions issued.
Permit Ref.	<b>3.6.2: Legal Authority</b> Measures to maintain adequate legal designs and proposals for new devel control measures will be installed, in plans, inspection reports, monitoring with the Post-Construction Stormwa inspecting at reasonable times any fa discharges to determine whether the Program.	opment and redevelopme mplemented, and maintair g results, and other inform ater Management Program acilities, equipment, pract	nt to determine whether a ned, (b) request informatic nation deemed necessary to n, and (c) enter private pro- ices, or operations related	dequate stormwater on such as stormwater o evaluate compliance perty for the purpose of to stormwater
BMP	Α	В	С	D
No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
26.	This permit requirement is fully met 19.	by the existing post-constr		nces provided in Table
	This permit requirement is fully met by the existing post-construction program, see references provided in	1. See Table 19.	1. See Table 19.	1. See Table 19.

Table 2	0: Post Construction Site Runoff C	ontrol BMPs				
Permit Ref.						
BMP	Α	В	С	D		
No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric		
27. Permit Ref.	This permit requirement is fully met by the existing post-construction program, see references provided in Table 19.         This permit requirement is fully met by the existing post-construction program, see references provided in Table 19.       1. See Table 19.       1. See Table 19.         This permit requirement is fully met by the existing post-construction program, see references provided in Table 19.       1. See Table 19.       1. See Table 19.         See Table 19.       1. See Table 19.       1. See Table 19.       1. See Table 19.         See Table 19.       1. See Table 19.       1. See Table 19.         See Table 19.       1. See Table 19.       1. See Table 19.         See Table 19.       1. See Table 19.       1. See Table 19.         See Table 19.       1. See Table 19.       1. See Table 19.         See Table 19.       1. See Table 19.       1. See Table 19.         See Table 19.       1. See Table 19.       1. See Table 19.         See Table 19.       1. See Table 19.       1. See Table 19.         See Table 19.       1. See Table 19.       1. See Table 19.         See Table 19.       1. See Table 19.       1. See Table 19.         See Table 19.       1. See Table 19.       1. See Table 19.         See Table 19.       1. See Table 19.       1. See Table 19.         See Table 19.       1. See Table 19.<					
BMP	A	В	C	D		
No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric		
28.	Inspection of Post Construction SCM Develop a schedule and detailed strategies for inspection of post construction SCMs.	Is 1. Inspect all the post construction SCMs within the Town's jurisdiction and take appropriate actions for SCMs that are out of compliance.	1. Each SCM shall be inspected at a minimum once within a 5-year permit term, with a minimum goal of 20% per year.	1. Number of SCMs inspected and how many SCMs there are.		

Table 2	0: Post Construction Site Runoff (	Control BMPs			
Permit Ref.	<b>3.6.6: Fecal Coliform Reduction</b> 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	Α	В	С	D	
No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric	
29.	Pet Waste Management				
	Develop and implement a pet waste management policy.	1. Develop a pet waste management policy.	1. Permit Year 3	1. Yes/No/Status	
		2. Implement the pet waste management policy.	2. Permit Year 4-5	2. Yes/No/Status	

#### PART 10: POLLUTION PREVENTION AND GOOD HOUSEKEEPING PROGRAMS

This SWMP provides a comprehensive pollution prevention and good housekeeping strategy for the Town of Woodfin 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 Woodfin 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.	<b>3.7.1:</b> 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	Α	В	С	D	
No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric	
30.	Municipal Facilities Inventory				
	Maintain inventory of municipal facilities and reach facilities potential for generating stormwater pollution.	1. Maintain inventory of municipal facilities and their potential for generating stormwater pollution.	1. Annually, Permit Years 1-5	1. Number of facilities identified	
31.	Public Works Standard Operating P	rocedure (PW SOP)			
	Create PW SOP with annual inspection and maintenance protocols for municipal facilities.	1. Create inspection and maintenance protocols in SOP. Include inventory of municipal facilities.	1. Permit Year 1.	1. Yes/No/Status	

Table 2	1: Pollution Prevention and Good H	Housekeeping BMPs				
		2. Perform an annual site inspection of municipal facilities to determine and document items of potential for spills or stormwater pollution. Review in place SPCC plans and update as necessary.	2. Permit Year 2-5.	2. Yes/No/Status Number of facility inspections.		
Permit Ref.	<b>3.7.2: Spill Response Program</b> 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	Α	В	С	D		
No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric		
32.	Spill Potential and Response Procedures					
	Any municipal facility that stores or works with materials which have the potential to contribute to polluted run-off shall be identified and written spill response procedures put in place.	1. Create written spill response procedures and provide to staff. Consider pertinent locations to post document.	1. Permit Year 2.	1. Yes/No/Status		
		2. Review procedures with all relevant staff.	2. Permit Years 2-5.	2. Yes/No/Status		
Permit Ref.	<ul> <li>3.7.3: MS4 Operation and Maintenance Program</li> <li>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.</li> </ul>					
BMP	Α	В	С	D		
No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric		
33.	Staff Training for Operation and Maintenance Activities         Implementation         Internet					
	Create a list of operation and maintenance activities to be performed by the Public Works staff.	1. Create an inspection form and maintenance work order system.	1. Permit Year 1.	1. Yes/No/Status		
	Train staff in maintenance procedures, stormwater awareness and pollution prevention.	2. Inspect and maintain the MS4 collection system. Document	2. 20% of the MS4 system each year, to accomplish full maintenance of the entire	2. Report number of inspection and maintenance activities.		

Permit Ref.	<b>3.7.4:</b> Municipal SCM Operation and Maintenance Program Measures to manage municipally owned, operated, and/or maintained structural stormwater control measures (SCMs) 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	В	C Schedule for	D Annual Reporting	
	Description of BMP	Measurable Goal(s)	Implementation	Metric	
34.	Schedule and Training for Municipa	l SCMs O&M			
	Review the Town's Operation and Maintenance Agreements for all municipal SCMs. Create a schedule and train staff to perform regular maintenance and inspections as required of each SCM.	1. Complete an inventory of all municipal SCMs. Complete maintenance and inspections, create documentation of when, what was done, issues and corrective measures.	1. Permit Year 1. As required by each specific municipal SCM's O & M Agreement.	1. Number of municipal SCMs. Report how many SCMs were inspected and maintained.	
		2. Complete an annual inspection of each	2. Permit Years 1-5.	2. Report date of annual certification of each	
		municipal SCM by appropriate personnel for required certification.		municipal SCM.	
Permit Ref.	<b>3.7.5: Pesticide, Herbicide and Ferti</b> Measures to minimize water quality im pollution prevention and chemical use, applicator certifications.	appropriate personnel for required certification. lizer Management Program pacts from the use of landsca	ape chemicals. The permit	tee shall provide routine	
Ref.	Measures to minimize water quality im pollution prevention and chemical use,	appropriate personnel for required certification. lizer Management Program pacts from the use of landsca	ape chemicals. The permit	tee shall provide routine	
Ref.	Measures to minimize water quality impollution prevention and chemical use, applicator certifications.	appropriate personnel for required certification. lizer Management Program pacts from the use of landsc: storage and handling trainin	ape chemicals. The permit g, and shall ensure complia	tee shall provide routine ance with permits and	
	Measures to minimize water quality impollution prevention and chemical use, applicator certifications.	appropriate personnel for required certification. lizer Management Program pacts from the use of landsc: storage and handling trainin B Measurable Goal(s)	ape chemicals. The permit g, and shall ensure complia C Schedule for	tee shall provide routine ince with permits and D Annual Reporting	
Ref. BMP No.	Measures to minimize water quality impollution prevention and chemical use, applicator certifications. A Description of BMP	appropriate personnel for required certification. lizer Management Program pacts from the use of landsc: storage and handling trainin B Measurable Goal(s)	ape chemicals. The permit g, and shall ensure complia C Schedule for	tee shall provide routine unce with permits and D Annual Reporting	

Table 2	1: Pollution Prevention and Good I	Iousekeeping BMPs				
Permit Ref.	<b>3.7.6: Vehicle and Equipment Maintenance Program</b> 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	A	B	С	D		
No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric		
36.	Vehicle and Equipment Cleaning and	d Maintenance Facility Ins	pection			
	Perform routine inspections to ensure that vehicle and equipment facilities	1. Develop an inspection checklist.	1. Permit year 2.	1. Yes/No/Status		
	are following proper procedures to minimize water quality impacts from vehicle and equipment cleaning and maintenance.	2. Inspect facilities where vehicle and equipment maintenance is performed. Record results and any issues and how issues were resolved.	2. Permit Years 2-5.	2. Yes/No/Status Number of inspections.		
Permit Ref.	t <b>3.7.7: Pavement Management Program</b> Measures to reduce pollutants in stormwater runoff from municipally owned streets, roads, and parking lots within permittee's corporate limits. The permittee shall implement measures to control litter, leaves, debris, particulate an pollutants associated with vehicles, and establish specific frequencies, schedules, and documentation.					
BMP	Α	В	С	D		
No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting		
37.	Street Cleaning					
	Street Cleaning			Metric		
		1. Document leaf and brush collection time periods and volume collected.	1. Permit Years 1-5.	Metric         1. Report volume of         leaves and brush         collected.		
38.	Catch Basin Cleaning	brush collection time periods and volume	1. Permit Years 1-5.	1. Report volume of leaves and brush		