

Stormwater Management Plan (SWMP)
Town of Clayton NCS000559

August 2025

Think NATURAL RESOURCES
Town of CLAYTON STORMWATER



Table of Contents

PART 1: INTRODUCTION	1
PART 2: CERTIFICATION	2
PART 3: MS4 INFORMATION	3
3.1 Permitted MS4 Area	3
3.2 Existing MS4 Mapping	4
3.3 Receiving Waters.....	4
3.4 MS4 Interconnection	5
3.5 Total Maximum Daily Loads (TMDLs).....	5
3.6 Endangered and Threatened Species and Critical Habitat.....	6
3.7 Industrial Facility Discharges	6
3.8 Non-Stormwater Discharges	6
3.9 Target Pollutants and Sources	7
PART 4: STORMWATER MANAGEMENT PROGRAM ADMINISTRATION	9
4.1 Organizational Structure	9
4.2 Program Funding and Budget	11
4.3 Shared Responsibility	11
4.4 Co-Permittees.....	12
4.5 Measurable Goals for Program Administration	12
PART 5: PUBLIC EDUCATION AND OUTREACH PROGRAM	16
PART 6: PUBLIC INVOLVEMENT AND PARTICIPATION PROGRAM	20
PART 7: ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM	22
PART 8: CONSTRUCTION SITE RUNOFF CONTROL PROGRAM	25
PART 9: POST-CONSTRUCTION SITE RUNOFF CONTROL PROGRAM	27
PART 10: POLLUTION PREVENTION AND GOOD HOUSEKEEPING PROGRAMS.....	32

List of Tables

Table 1: Summary of MS4 Mapping

Table 2: Summary of MS4 Receiving Waters Table 3:

Summary of Approved TMDLs

Table 4: Summary of Federally Listed Species/Habitat Impacted by Surface Water Quality Table 5:

NPDES Stormwater Permitted Industrial Facilities

Table 6: Non-Stormwater Discharges

Table 7: Summary of Target Pollutants and Sources Table 8:

Summary of Responsible Parties

Table 9: Shared Responsibilities

Table 10: Co-Permittee Contact Information Table 11:

Program Administration BMPs

Table 12: Summary of Target Pollutants & Audiences Table

13: Public Education and Outreach BMPs Table 14: Public

Involvement and Participation BMPs

Table 15: Illicit Discharge Detection and Elimination BMPs

Table 16: Qualifying Alternative Program Components for Construction Site Runoff Control Program Table 17:

Construction Site Runoff Control BMPs

Table 18: Qualifying Alternative Program(s) for Post-Construction Site Runoff Control Program Table 19:

Summary of Existing Post-Construction Program Elements

Table 20: Post Construction Site Runoff Control BMPs

Table 21: Pollution Prevention and Good Housekeeping BMPs

PART 1: INTRODUCTION

The purpose of this Stormwater Management Plan (SWMP) is to establish and define the means by which the Town of Clayton (Town) 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 Clayton 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 NCS000559, 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 Clayton and located within the corporate limits and ETJ of the Town of Clayton.

In preparing this SWMP, the Town of Clayton 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.

The six minimum measures the Town is required to address are the following:

- Public Education and Outreach
- Public Involvement and Participation
- Illicit Discharge Detection and Elimination (IDDE)
- Construction Site Runoff Controls
- Post-Construction Runoff Controls
- Pollution Prevention and Good Housekeeping for Municipal Operations


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 D. Cappola, PE, MPA, CFM
Title:	Town Manager
Signed this <u>16th</u> day of April 2025 .	

PART 3: MS4 INFORMATION

3.1 Permitted MS4 Area

This SWMP, and the MS4 permit, applies throughout the corporate limits and the ETJ (extra-territorial jurisdiction) of the Town of Clayton, including all regulated activities associated with the discharge of stormwater from the MS4.

As of July 2022, the Town's current corporate area is 16.08 square miles; the Town's ETJ and zoning jurisdictional area is 46.33 square miles. The Town's corporate limits and ETJ are located within Johnston County, with a small portion located in Wake County.

The following map (Figure 1) shows the corporate limits and the ETJ of the Town of Clayton as of July 2022. Additionally, this map is updated regularly and can be viewed on the [Town's GIS webpage](#).

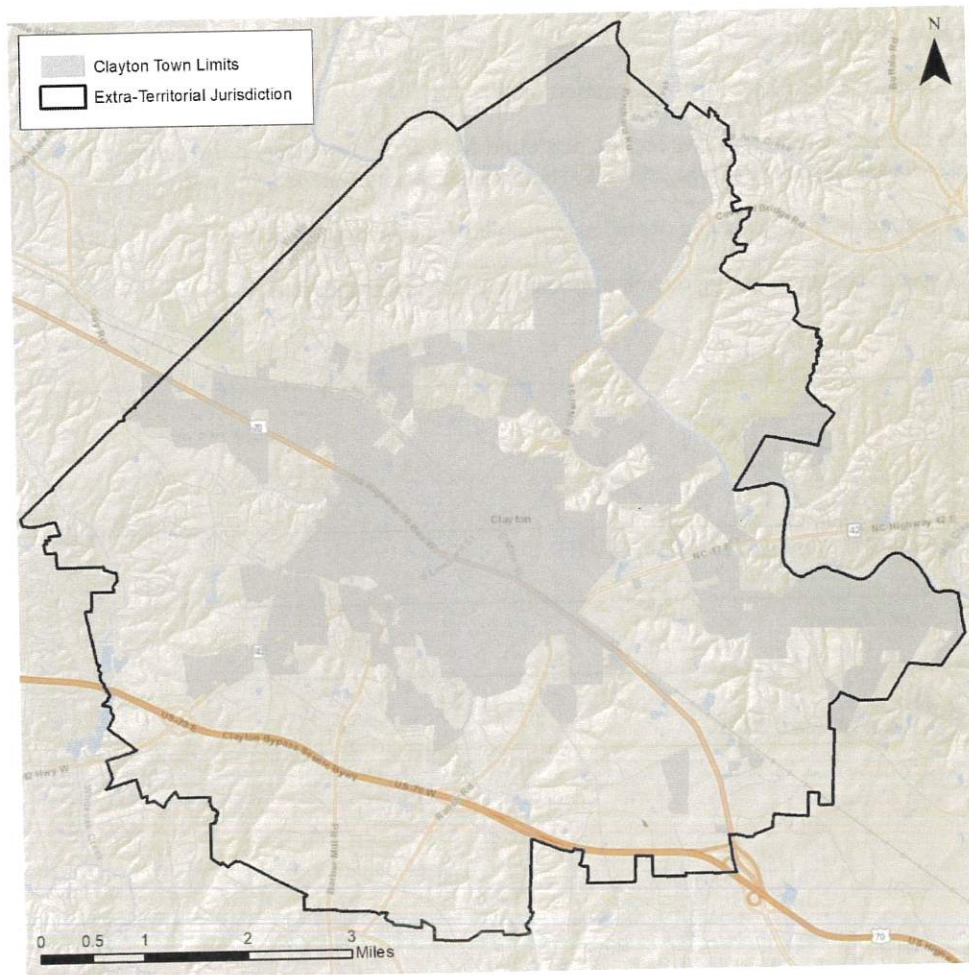


Figure 1: Town of Clayton Corporate Limits and ETJ as of July 2022

3.2 Existing MS4 Mapping

The current MS4 mapping consists of both closed channel and open channel vegetative conveyance. Stormwater is conveyed through a combination of pipes, curbs, gutters, ditches, swales, drop inlets, catch basins, culverts, outfalls, bridges, and overland sheet flow. Additionally, the MS4 mapping includes an inventory of both public and privately maintained stormwater control measures (SCMs). For most of the MS4 mapped drainage features, identifying information such as type of material, pipe diameter, culvert dimensions, and inverts is included. The SCMs include the type and location, and when available, reference to the recorded Operation and Maintenance (O&M) Manual.

To adequately prepare for Capital Improvement Program (CIP) needs as well as ensure the safety and well-being of the residents within the Town's corporate limits and ETJ and our down-stream community neighbors, the Town has identified finalizing GIS mapping of the Town's stormwater system and developing a Town wide Stormwater Master Plan as major priorities within the next five (5) years.

The Town's MS4 GIS map can be found [here](#).

Table 1: Summary of MS4 Mapping (as of 2021 annual report)

Percent of MS4 Area Mapped	65	%
No. of Major Outfalls* Mapped	193	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 ≥ 2-acres.*

3.3 Receiving Waters

The receiving waters within the Town of Clayton corporate limits and ETJ are located solely within the Neuse River Basin. Table 2, listed below, identifies an inventory of receiving streams within the MS4 area. The stream index number, water quality classification, and 303(d) list of parameters of interest are noted in Table 2.

Applicable water quality standards listed below are compiled from the following NCDEQ sources:

- [Surface Water Classification Map](#)
- NCDEQ Final with Impaired Waters; [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
Big Arm Creek	27-38-1	C; NSW	n/a
Little Creek	27-43-12	C; NSW	Benthos (Nar, AL, FW)
Marks Creek	27-38	C; NSW	n/a
Neuse River	27-(36)	WS-V; NSW	Copper (7ug/l, AL, FW); Zinc (50ug/l, AL, FW)
Neuse River	27-(38.5)	WS-IV; NSW	n/a

3.4 MS4 Interconnection

The Town of Clayton 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 NCDOT's statewide TS4 and includes the following:

1. The interconnection is receiving stormwater from the NCDOT TS4. The number of interconnections was not able to be determined using the data that is currently available.
2. The interconnection is discharging stormwater into the NCDOT TS4. The number of interconnections was not able to be determined using the data that is currently available.

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)
Neuse River Estuary	Total Nitrogen	N	N

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, as determined by a review of the <https://www.ncwildlife.org/protected-wildlife-species-north-carolina/open> as provided by the [U.S. Fish and Wildlife Service](#). Of those species listed, Table 4 summarizes the species that may be significantly impacted by the quality of surface water within their habitat.

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

Scientific Name	Common name	Species Group	Federal Listing Status
<i>Elliptio steinstansana</i>	Tar River spinymussel	Clams	Endangered
<i>Alasmidonta heterodon</i>	Dwarf wedgemussel	Clams	Endangered
<i>Noturus furiosus</i>	Carolina madtom	Fishes	Endangered
<i>Elliptio lanceolata</i>	Yellow lance	Clams	Threatened
<i>Fusconaia masoni</i>	Atlantic pigtoe	Clams	Threatened
<i>Necturus lewisi</i>	Neuse River waterdog	Amphibians	Threatened

3.7 Industrial Facility Discharges

The Town of Clayton MS4 jurisdictional area includes the following industrial facilities which hold NPDES Industrial Stormwater Permits, as determined from the [Actives NPDES Industrial Stormwater Permits](#).

Table 5: NPDES Stormwater Permitted Industrial Facilities

Permit Number	Facility Name (owner)
NCG030690	Clayton Machine Development Center (Caterpillar Inc.)
NCG030211	Caterpillar Incorporated (same)
NCG060402	Novo Nordisk-DAPI-US (Novo Nordisk Pharmaceuticals Industries LP)
NCG060048	Novo Nordisk Pharmaceuticals Industries, LP (same)
NCG060039	Grifols Therapeutics LLC (same)
NCG200498	Renew Recycling LLC (same)
NCS000559	Town of Clayton- Small MS4
NCG030749	PCX Corp. Clayton Facility
NCG050470	MM Clayton LLC
NCG110080	Little Creek Water Reclamation (Town of Clayton)

3.8 Non-Stormwater Discharges

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

Wash water associated with car washing that does not contain detergents or does not discharge directly into the MS4 is considered incidental. Residential and non-profit car washing is exempt from the Town's IDDE ordinance. However, these types of non-stormwater discharges that do contain detergents have been evaluated by the Town of Clayton to determine whether they may significantly impact water quality. It has been determined by the Town of Clayton that residential and non-profit car washing may impact water quality, but they occur infrequently enough it does not need to be limited at this time. This SWMP addresses measures taken by the Town of Clayton to reduce the target pollutants of wash water associated with residential and non-profit car washing.

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 above, the Town of Clayton is not aware of other significant water quality issues within the permitted MS4 area.

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 Clayton 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)
Sediment	Erosion and Construction Site Runoff/ Residents, Businesses, Contractors, Engineers, and Private Developers	Public Education & Outreach Construction Site Runoff Controls - Erosion Control Ordinance; Illicit Discharge Ordinance (IDDE)
Pool Discharge	Residents and Businesses	Public Education & Outreach
Yard Waste	Inappropriate Disposal/ Residents, Businesses, and Schools	Public Education and Outreach; Pollution Prevention and Good Housekeeping
Litter	Inappropriate Disposal/ Residents, Businesses, Schools, and Municipal	Public Education and Outreach; Pollution Prevention and Good Housekeeping
Pesticides, Herbicides, and Insecticides	Improper application/ Residents, Businesses, Schools, and Municipal	Public Education and Outreach; Pollution Prevention and Good Housekeeping
Household Hazardous Waste	Inappropriate Disposal/ Residents, Businesses, and Schools	Public Education and Outreach; Illicit Discharge Ordinance (IDDE)
Fats, Oils, Greases (FOG)	Inappropriate Disposal/ Residents and Businesses	Public Education and Outreach; Illicit Discharge Ordinance (IDDE); Pollution Prevention and Good Housekeeping
Fecal Coliform	Inappropriate Disposal/ Residents, Businesses, and Municipal	Public Education and Outreach; Illicit Discharge Ordinance (IDDE)
Illicit Discharges	Inappropriate Disposal/ Residents, Businesses, Schools, and Municipal	Public Education and Outreach; Illicit Discharge Ordinance (IDDE); Pollution Prevention and Good Housekeeping
Illegal dumping	Inappropriate Disposal/ Residents, Businesses, Schools, and Municipal	Public Education and Outreach; Illicit Discharge Ordinance (IDDE)

PART 4: STORMWATER MANAGEMENT PROGRAM ADMINISTRATION

4.1 Organizational Structure

The Town of Clayton stormwater program is administered by the Engineering Department. The Stormwater Engineer, under supervision of the Engineering Director, manages the daily implementation of the program. Additional contributions are provided by several departments within the organization: Public Works, Water Resources, Parks and Recreation, Fire, Police, and the Executive Team.

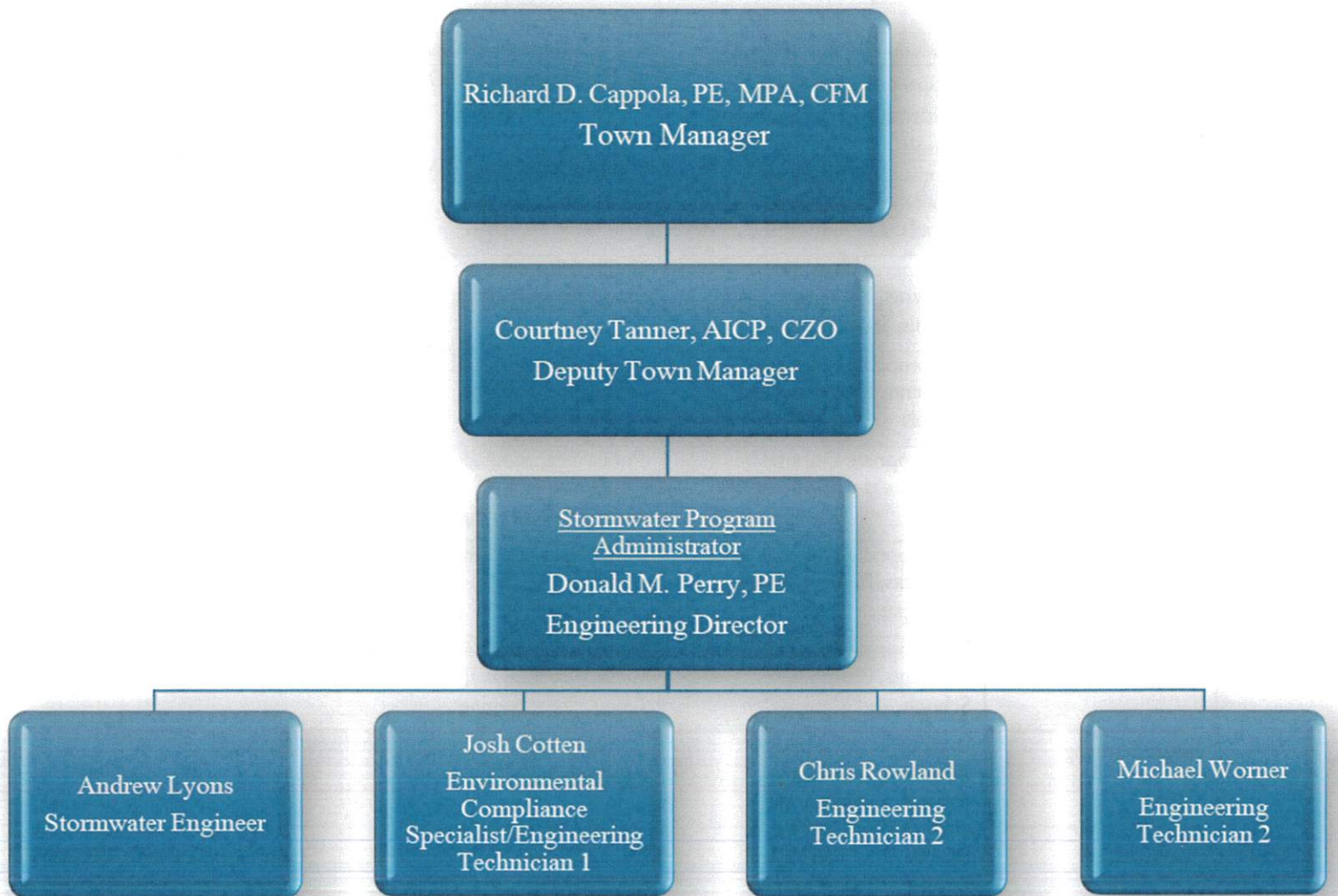


Table 8: Summary of Responsible Parties

SWMP Component	Responsible Position	Staff Name	Department
Stormwater Program Administration	Engineering Director	Donald M. Perry, PE	Engineering
SWMP Management	Stormwater Engineer	Andrew Lyons	Engineering
Public Education & Outreach	Environmental Compliance Specialist	Josh Cotten	Engineering
Public Involvement & Participation	Stormwater Engineer	Andrew Lyons	Engineering
Illicit Discharge Detection & Elimination	Environmental Compliance Specialist	Josh Cotten	Engineering
Construction Site Runoff Control	Stormwater Engineer	Andrew Lyons	Engineering
Post-Construction Stormwater Management	Stormwater Engineer	Andrew Lyons	Engineering
Pollution Prevention/Good Housekeeping for Municipal Operations	Environmental Compliance Specialist	Josh Cotten	Engineering
Municipal Facilities Operation & Maintenance Program	Environmental Compliance Specialist	Josh Cotten	Engineering
Spill Response Program	Environmental Compliance Specialist	Josh Cotten	Engineering
MS4 Operation & Maintenance Program	Stormwater Engineer	Andrew Lyons	Engineering
Municipal SCM Operation & Maintenance Program	Stormwater Engineer	Andrew Lyons	Engineering
Pesticide, Herbicide & Fertilizer Management Program	Environmental Compliance Specialist	Josh Cotten	Engineering
Vehicle & Equipment Cleaning Program	Environmental Compliance Specialist	Josh Cotten	Engineering

4.2 Program Funding and Budget

In accordance with the issued permit, the Town of Clayton 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 currently receives funding of approximately \$ 500,000 per year; funded through the Town's General Fund. The program has 12 staff members; 2 full-time stormwater staff and 10 full-time auxiliary staff to provide program support.

The Town's MS4 program has recently become administered by Town staff and is still being fully developed. The program is currently under-funded and under-staffed to conduct all the proactive elements of the permit. Further fiscal analysis and investigation will be conducted to further evaluate staff and funding needs. Additionally funding sources, such as a Stormwater Utility Fee, may also be evaluated to reduce the gap in available funding.

4.3 Shared Responsibility

The Town of Clayton 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 Clayton remains responsible for compliance if the other entity fails to fulfil the permit obligation and may be subject to enforcement action if neither the Town of Clayton 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

SWMP BMP or Permit Requirement	Implementing Entity & Program Name	Legal Agreement (Y/N)
Table 13 – BMP # 4 Permit Section 3.2.2 and 3.2.4	Clean Water Education Partnership (CWEP)	Y

4.4 Co-Permittees

There are no other entities applying for co-permittee status under the NPDES MS4 permit number NCS000559 for the Town of Clayton. Table 10 summarizes contact information for each co-permittee.

Table 10: Co-Permittee Contact Information

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

4.5 Measurable Goals for Program Administration

The Town of Clayton 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 Program Implementation 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 No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	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 Years 1 – 5	1. Yes/No
#. 2	Shared Responsibility (Permit Ref. 1.4)			

Table 11: Program Administration BMPs

	<p><i>Measures to confirm that all entities other than the permittee implementing all or part of any MCM.</i></p> <p>Example: Agreements with entities operating on behalf of the town/city of [MS4 name] will be reviewed to confirm that the entity has agreed to implement part of the program on the municipalities behalf and that all required documentation will be submitted to the municipality for documentation and reporting purposes.</p>	1. Review all agreements and confirm that they meet all requirements outlined in 1.4 of the MS4 permit.	1. Permit Year 1	1. Yes/No
#. 3	Minimum Control Measures (Permit Ref. 2.2.2)			
	<p><i>Measures to assure that a written program will be created for all MCMs.</i></p> <p>Example: 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 and modified if needed to best outline the program and needs of the municipality.</p>	1. Develop and maintain written programs for all minimum control measures.	1. Permit Year 1	1. Yes/No
		2. Review written programs and modify/update.	2. Annually	2. Yes/No
#. 4	Funding and Staffing (Permit Ref. 2.1.1)			
	<p><i>Measures to evaluate the current funding and staffing status of the program.</i></p> <p>Example: The funding and staffing status of the program will be evaluated by appropriate City/Town staff to confirm that the program is meeting permit requirements.</p>	1. Review and analyze the current funding and staffing of the program.	1. Annually	1. Adequate/inadequate
Permit Ref.	<p>1.6: Permit Renewal Application</p> <p>Measures to submit a permit renewal application no later than 180 days prior to the expiration date of the NPDES MS4 permit.</p>			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric

Table 11: Program Administration BMPs

#. 5	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 Clayton 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 Clayton 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 Pollutant/Sources	Likely Source(s)/Target Audience(s)
Sediment	Residents, Businesses, Contractors, Engineers, and Private Developers
Pool Discharge	Residents and Businesses
Yard Waste	Residents, Businesses, and Schools
Litter	Residents, Businesses, Schools, and Municipal
Pesticides, Herbicides, and Insecticides	Residents, Businesses, Schools, and Municipal
Household Hazardous Waste	Residents, Businesses, and Schools
Fats, Oils, Greases (FOG)	Residents and Businesses
Fecal Coliform	Residents, Businesses, and Municipal
Illicit Discharges	Residents, Businesses, Schools, and Municipal
Illegal dumping	Residents, Businesses, Schools, and Municipal

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

The Town will utilize existing major Town events, such as the annual Square to Square July 4th Celebrate and Harvest Festival as a platform for stormwater public education and outreach. Additionally, the Town will utilize other Town events throughout the year when opportunities arise such as the Clayton Farm and Community Market. Educational materials will be displayed as well as distributable materials such as brochures and “swag” to promote reducing pollutants in storm water runoff.

Table 13: Public Education and Outreach BMPs

Permit Ref.	II.B.2a-d: Outreach to Targeted Audiences 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 No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
#6	Partnership with CWEP			
	The Town will engage with CWEP to develop Education and Outreach Initiatives that will be administered by CWEP. Initiatives will focus on residential, commercial, and school audiences within the MS4 area.	1. Arrange partnership with CWEP and establish legal agreement.	1. Each Permit Year	1. Provide Legal Agreement
		2. Attend regularly scheduled CWEP meetings	2. Quarterly	2. Yes/No
#7	Town Sponsored Events/Festivals			
	The Town will distribute information on stormwater during at least one City sponsored event or festival a year, such as Square to Square or Harvest Festival.	1. Develop stormwater maintenance brochure to hand out at festivals	1. Permit Year 2	1. Yes/No
		2. Coordinate event dates with CWEP to have additional people available to assist in the event	2. Annually	2. Yes/No
		3. Attend two events a year.	3. Bi-Annually	3. Number of Contact Hours
#8	SCM Educational Signage			
	Educational signage will be added to Town-owned SCMs that are visible to the public.	1. Locate town-owned SCMs and add them to the inventory	1. Permit Year 2	1. Yes/No
		2. Develop educational signage that identifies SCMs, describes its function and notes TOC Stormwater website	2. Permit Year 3	2. Yes/No
		3. Fund and Install signage	3. Permit Year 4	3. Yes/No

#9	Describe Target Pollutants and/or stressors			
	Maintain a description of the target pollutants and/or stressors and likely sources	1. Document description of the target pollutants in Table 12 of this SWMP.	1. Permit Year 1	N/A
		2. Update Table 12, as needed, if any new target pollutants are determined to risk water quality.	2. Annually	2. Yes/No
#10	Describe Residential and Industrial/Commercial Issues			
	Describe issues, such as pollutants, likely sources of those pollutants, impacts, and the physical attributes of stormwater runoff, in their education/outreach program.	1. Update list of issues, as needed if any new common issues are determined to risk water quality.	2. Annually	2. Yes/No
Permit Ref.	B.2.e: Town of Clayton Stormwater 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
#11	Stormwater Page on Town Website			
	Web page will provide information on the Town's Stormwater Program. Information will include applicable ordinances, MS4 permit, SWMP and links to additional stormwater educational resources.	1. Establish stormwater web page.	1. Permit year 1	1. Yes/No
		2. Maintain webpage. Verify links are working. Update any information.	2. Quarterly	2. Yes/No
		3. Promote website on outreach materials and social media.	3. Quarterly	3. Yes/No
		4. Establish outreach sign-up page.	4. Permit year 3	4. Yes/No
Permit Ref.	B.2.f: Distribute Public Education Materials Measures for providing public education materials to the identified target audiences in this SWMP.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
#12	Social Media Campaign			

	Utilize the Town's various existing social media pages to reach the target audience as identified in this SWMP. A minimum of one post per quarter will be provided.	1. Post CWEP Social Media Posts.	1. Quarterly	1. Report number of posts.
Permit Ref.	B.2.g: Maintain 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
#13	Stormwater Hotline			
	Promote and maintain an active hotline or helpline for Stormwater.	1. Update phone number on the website and promotional materials, as needed	1. Permit Year 1	1. Yes/No
		2. Train all customer service staff on appropriate transferring calls to the hotline.	2. Annually	2. Yes/No
		3. Promote hotline on outreach materials and social media	3. Quarterly	3. Yes/No
		4. Track hotline calls received.	4. Annually	4. Report on the number of calls received.

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

Table 14: Public Involvement and Participation BMPs				
Permit Ref.	C.2.b-c: Public Input Mechanisms for public involvement that provide for input on stormwater issues and the stormwater program.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
#14	Online Public Comments			
	Stormwater questions or concerns can be entered through an online submission for on the Town's updated website. Comments will be directed to the appropriate Town staff.	1. Promote and maintain the online submission forms to allow public input to be generated.	1. Permit Year 1.	1. Yes/No

Permit Ref.	C.2.a: Volunteer Opportunities Measures to provide volunteer opportunities designed to promote ongoing citizen participation.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
#15	Stream Clean-Up			
	A stream cleanup is an organized effort to remove trash and other debris from a stream or river. The goal is to improve water quality and wildlife habitats.	1. Partner with Sound Rivers to implement a Trash Trap. Trash Trap to be located on Little Creek.	1. Annually	1. Yes/No
		2. Post on Stormwater Website and TOC social media about trash removal volunteer opportunities	2. Quarterly	2. Number of posts
		3. Provide Educational Signage/brochures on why	3. Permit Year 1	3. Yes/No

		keeping our stream clean is important.		
#16	Promote Regional Creek Week			
	CWEP organizes an annual Creek Week, which will be promoted via social media and the Town's website. Participate in the Year 1 and Year 2 Creek Week events to gain insights and experience in hosting a similar event in Clayton. Consider organizing a 5K along the greenway or a stream cleanup as part of the event.	1. Promote Creek Week on Stormwater Website and various TOC social media outlets.	1. Annually.	1. Yes/No
		2. Create an in-house Creek Week Event annually once experience is gained from participating in a regional creek week.	2. Annually after Permit Year 3.	2. Yes/No

PART 7: ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM

The Town of Clayton 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 (IDDE) BMPs				
Permit Ref.	D.2.b: 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
#17	MS4 Mapping			
	Update and complete the MS4 Mapping area to record a system map of all major outfalls, surface waters, conveyances, flow direction, and interconnections with other programs.	1. 100% mapping of MS4 in Town Limits and ETJ	1. Permit Year 3	1. Percentage of mapping completed in annual reports.
		2. Maintain current MS4 map as new infrastructure is proposed and accepted by the Town.	2. Continuously	2. Yes/No
Permit Ref.	D.1.c and D.2.a: 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
#18	Maintain Legal Authority			
	Review existing ordinance; update if required to maintain legal authority to prohibit, detect, and eliminate illicit connections or discharges, illegal dumping, and spills into MS4.	1. Review ordinance	1. Annually	1. Report ordinance adoption date and any update performed in the annual reports.

Permit Ref.	D.1.a-f: 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
#19	Develop IDDE Standard Procedures			
	Develop and maintain internal procedures for IDDE investigations	1. Create Standard Operation Procedures	1. Permit Year 2	1. Yes/No
#20	Dry Weather Flow Inspections – Major Outfalls			
	Perform regular dry weather (no rain in previous 72 hours) outfall inspections to proactively identify illicit discharges and connections.	1. Train field staff to perform dry weather outfall inspections	1. Annually	1. Provide the number of Employees trained.
		2. Inspect 100 % of major outfalls with properly trained staff.	1. 20% each Permit Year beginning Permit Year 2.	Yes/No
Permit Ref.	D.2.e: 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
#21	Record Keeping			
	Establish filing system that enables Town staff to report the number of illicit discharge “investigations” performed.	1. Track number of illicit discharge investigations	1. Continuously	1. Report on how many reports of illicit discharge were reported.
		2. Document date, type,	2. Continuously	2. Number of investigations

		location, and results of each IDDE investigation.		4. Number of NOV's issued
				5. Number of NOV's resolved
				6. Number of enforcement actions taken

Permit Ref.	D.2.f: 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
#22	Staff Training			
	Develop program to educate Town staff of indicators of potential illicit discharges/connections and illegal dumping and the appropriate means of reporting such incidents.	1. Provide Training for operation and maintenance staff.	1. Annually	1. Number of staff trained
#23	Fact Sheets			
	Hang fact sheet posters in staff communal areas for educational purposes and reminders of basics of identifying and reporting illicit discharges/connections.	1. Create/Purchase/Develop guidelines for spotting/reporting illicit discharge.	1. Year 2	1. Yes/No
		2. Display posters in communal areas of Town Hall and Operations	2. Year 2	2. Yes/No
Permit Ref.	D.2.h: 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
#24	Reporting			

	Develop and promote a reporting mechanism for the public and municipal staff to easily report illicit discharges and establish and implement citizen requests.	1. Develop Reporting Mechanism for the public and TOC staff.	1. Permit Year 1	1. Yes/No
		2. Investigate and respond to IDDE Complaints.	2. As reported	2. Report # of complaints received
		3. Follow up to verify all IDDE concerns have been corrected/resolved.	3. As reported and identified	3. Report # of resolutions

PART 8: CONSTRUCTION SITE RUNOFF CONTROL PROGRAM

In accordance with 15A NCAC 02H .0153, the Town of Clayton relies upon the North Carolina Sedimentation Pollution Control Act (SPCA) of 1973 and the NCG010000 permit for construction activities as qualifying alternative programs to meet the NPDES MS4 Permit requirements for all construction site runoff control measures to reduce pollutants in stormwater runoff from construction activities that result in land disturbance of greater than or equal to one acre and any construction activity that is part of a larger common plan of development that would disturb one acre or more.

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

Permit Reference	State or Local Program Name	Legal Authority	Implementing Entity	Meets Whole or Part of Requirement
E.1	Town of Clayton Delegated SPCA Program*	15A NCAC Chapter 04	Town of Clayton	Whole

* The local delegated SPCA Program ordinance(s)/regulatory mechanism(s) can be found at: <https://www.townofclaytonnc.org/746/Unified-Development-Ordinance> (Chapter 6 section 14)

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

Table 17: Construction Site Runoff Control BMPs				
Permit Ref.	E.3: 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	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
#25	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 beginning in Permit Year 1	1. Report the number of staff trained, and topics covered

Permit Ref.	E.2: 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.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
#26	Maintain Legal Authority			
	Waste Management on construction sites are captured in the illicit discharge ordinance and can be used as a mechanism of enforcement.	1. Train Town staff in proper waste management on construction sites.	1. Annually beginning in Permit Year 1.	1. Number of employees trained, and topics covered.

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, which are located within the Town of Clayton 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 Clayton 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 QAP Name	State Requirements	Local Ordinance / Regulatory Mechanism Reference
Water Supply Watershed (WS-IV)	15A NCAC 2B .0620 - .0624	Town of Clayton Code of Ordinances – Chapter 3 (3.75)
Neuse River Basin Nutrient Sensitive (NSW) Management Strategy	15A NCAC 02B .0711	Town of Clayton Code of Ordinances – Chapter 6 (6.15)

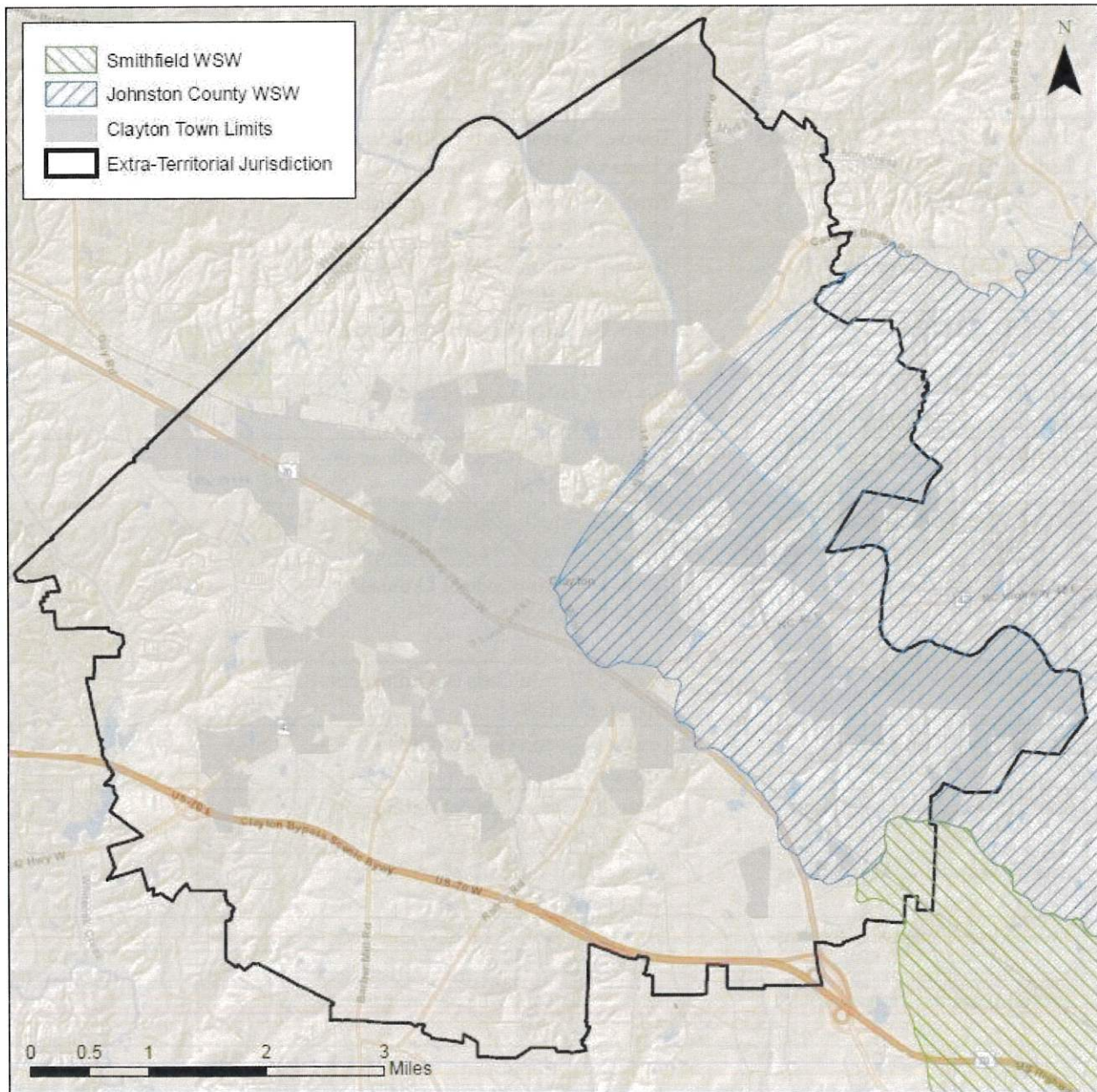


Figure 2: Town of Clayton Water Supply Watershed as of July 2022

The Town of Clayton 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.

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	Town of Clayton Code of Ordinances – Chapter 6 (6.15.1)	Adopted 11/20/23; effective 1/2/24 Amended:12/16/24
3.6.3(a) & 15A NCAC 02H0153(c) Federal, State & Local Projects	Town of Clayton Code of Ordinances – Chapter 6 (6.15.1)	"
3.6.3(b) Plan Review	Town of Clayton Code of Ordinances – Chapter 6 (6.15.7 – 6.15.8)	"
3.6.3(c) O&M Agreement	Town of Clayton Code of Ordinances – Chapter 6 (6.15.9)	"
3.6.3(d) O&M Plan	Town of Clayton Code of Ordinances – Chapter 6 (6.15.9)	"
3.6.3(e) Deed Restrictions/Covenants	Town of Clayton Code of Ordinances – Chapter 6 (6.15.9)	"
3.6.3(f) Access Easements	Town of Clayton Code of Ordinances – Chapter 6 (6.15.9)	"
Permit Requirements for Inspections and Enforcement	Municipal Ordinance/ Code Reference(s) and/or Document Title(s)	Date Adopted
3.6.2(b) Documentation	Town of Clayton Code of Ordinances – Chapter 6 (6.15.9)	Adopted 11/20/23; effective 1/2/24 Amended:12/16/24
3.6.2(c) Right of Entry	Town of Clayton Code of Ordinances – Chapter 6 (6.15.9)	"
3.6.4(a) Pre-CO Inspections	Town of Clayton Code of Ordinances – Chapter 6 (6.15.9)	"
3.6.4(b) Compliance with Plans	Town of Clayton Code of Ordinances – Chapter 6 (6.15.9)	"
3.6.4(c) Annual SCM Inspections	Town of Clayton Code of Ordinances – Chapter 6 (6.15.9)	"
3.6.4(d) Low Density Inspections	Town of Clayton Code of Ordinances – Chapter 6 (6.15.9)	"
3.6.4(e) Qualified Professional	Town of Clayton Code of Ordinances – Chapter 6 (6.15.9)	"

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.	F.3.a-e: 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
#27	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	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	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 acreage, location, and last inspection date.	3. Continuously	3. Summary of number and type of SCMs added to the inventory; and number and acreage of low-density projects constructed.
		4. Track number of SCM inspections performed.	4. Continuously	4. Number of SCM inspections.
		5. Track number of low-density inspections performed.	5. Continuously	5. Number of low-density inspections.
		6. Track number and type of enforcement actions taken.	6. Continuously	6. Number and type of enforcement actions taken.
Permit Ref.	F.3.a and F.3.c: Qualifying Alternative Program(s) Measures to develop, implement and enforce additional BMPs in order to comply with the QAP state program requirements.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
	The QAP requirements are fully met by the existing QAP for post-construction, see references provided in Table 18			

Table 20: Post Construction Site Runoff Control BMPs

Permit Ref.	F.2.a: 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.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
	This permit requirement is fully met by the existing post-construction program, see references provided in Table 19			
Permit Ref.	F.2.c: 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
	This permit requirement is fully met by the existing post-construction program, see references provided in Table 19			
Permit Ref.	F.2.g and F.2.i: 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.			
	A	B	C	D

Table 20: Post Construction Site Runoff Control BMPs				
BMP No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
	This permit requirement is fully met by the existing post-construction program, see references provided in Table 19			
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.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
#28	Fecal Coliform Training			
	Introduce Trainings that expand on what it is, why is it a concern, sources, and standards & Regulations.	1. Host training sessions for town staff.	1. Annually	1. Report # of Staff Trained.
		2. Provide/Design/Create Educational tools, to be passed out/displayed in communal areas and around city limits.	2. Permit Year 3	2. Report # of educational material passed out.
		3. Create a pet waste management strategy and implement it into the town of Clayton Ordinance.	3. Permit Year 4	3. Yes/No

PART 10: POLLUTION PREVENTION AND GOOD HOUSEKEEPING PROGRAMS

This SWMP provides a comprehensive pollution prevention and good housekeeping strategy for the Town of Clayton 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 Clayton 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.	G.2.a-j: 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	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
#29	Staff Training			
	Provide staff training to prevent and reduce stormwater pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbance, and stormwater system maintenance.	1. Host Training to discuss common non-point pollution sources.	1. Annually beginning Permit Year 1.	1. Report # of staff trained, and topics covered.
		2. Provide staff training for those in positions that may need to respond to contaminated stormwater runoff	2. Annually beginning Permit Year 1.	2. Report # of staff trained, and topics covered.
		3. Provide staff training for field personnel on stormwater awareness, illicit discharge/pollution prevention.	3. Annually beginning Permit Year 1.	3. Report # of staff trained, and topics covered.
		4. Require staff training for those involved with pesticide, herbicide, and fertilizer applications.	4. Annually beginning Permit Year 2.	4. Report # of staff trained, and topics covered.
		5. Educate staff on preventing and minimizing contaminated stormwater runoff in addition to ensuring municipal industrial facilities are meeting requirements	5. Annually beginning Permit Year 2.	5. Yes/No.
#30	Inventory of Town owned or operated facilities			
	Maintain inventory of facilities and operations owned and operated by the Town with the potential for generating polluted stormwater runoff.	1. Maintain an updated inventory of municipal facilities with the potential for generating polluted stormwater runoff.	1. Annually	1. Report # of facilities
#31	Inspection and Maintenance of Town Facilities			

	Maintain and implement and Inspection and Maintenance Program of all Town Owned or Operated Facilities.	1. Develop an inspection schedule for Town Owned Facilities.	1. Permit Year 2	1. Report number of required inspections
Permit Ref.	G.2.c and G.2.i: 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
#32	Standard Operating Procedures (SOPs) for Spill Response			

	Develop written SOP(s) for various spill responses.	1. Assign staff to develop and write SOPs.	1. Permit Year 2	1. Yes/No
		2. Update or amend items in SOP	2. Annually	2. Report on any changes made.
Permit Ref.	G.2.b and G.2.i: 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
#33	System Inspections			
	Establish specific frequencies, schedules, and documentation of MS4 inspections of catch basins, drop inlets and conveyances.	1. Establish schedule and mapping for routine inspections	1. Permit Year 3	1. Yes/No
		2. Perform routine inspections as scheduled	2. Annually	2. Report # of inspections performed?
		3. Identify system maintenance/repair needs	3. Annually	3. Report # of repairs
		4. Schedule necessary system maintenance	4. Annually	4. Report # of repairs completed
Permit Ref.	G.2.g: Municipal SCM Operation and Maintenance Program Measures to manage municipally owned, operated, and/or maintained structural 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	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
#34	SCM Inventory and Inspection			

	Develop inventory and inspection schedule of Town owned SCMs	1. Complete Clayton owned SCM inventory	1. Permit Year 2	1. Report # of Town Owned SCMs.
		2. Develop annual/routine inspection schedule for Clayton SCMs	2. Beginning of Permit Year 3	2. Yes/No

#35	SCM Maintenance			
	Perform and document routine inspections and maintenance of Town owned SCMs	1. Perform routine inspections	1. Continuously	1. Report # of Town Owned SCM Inspections
		2. Document inspections and repair needs	2. Continuously	2. Report # of Repairs
		3. Perform SCM repairs as necessary	3. Result of Inspection	3. Report # of Repairs made.
Permit Ref.	G.2.h and G.2.i: 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
#36	Training and Education	1. Require staff training for those involved with pesticide, herbicide, and fertilizer applications.	1. Annually beginning Permit Year 2.	1. Report # of staff trained, and topics covered.
Permit Ref.	G.2.j and G.2.i: 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
#37	Training and Education	1. Educate staff on preventing and minimizing contaminated stormwater runoff in addition to ensuring municipal industrial facilities are meeting requirements	1. Annually beginning Permit Year 2.	1. Yes/No.

Permit Ref.	G.2.d: 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
#38	Street Sweeping			
	Develop schedule for routine street sweeping of Town maintained streets which have curb and gutter systems. Provide modified SWMP to include measurable goals once street sweeping program has been developed.	1. Develop Street Sweeping Map with Schedule on ArcGis	1. Permit Year 2	1. Yes/No
		2. Implement routine street sweeping	2. Permit Year 3	2. Report # of miles Swept