

# **Stormwater Management Plan and Nutrient Management Strategy**

**Town of Wendell**

**NCS000564**

April 14, 2025



## Table of Contents

<b>Part 1: Introduction .....</b>	<b>1</b>
<b>Part 2: Certification .....</b>	<b>2</b>
<b>Part 3: MS4 information .....</b>	<b>3</b>
3.1 Permitted MS4 Area .....	3
3.2 Existing MS4 Mapping.....	3
3.3 Receiving Waters.....	5
3.4 MS4 Interconnection.....	5
3.5 Total Maximum Daily Loads (TMDLs) .....	6
3.6 Endangered and Threatened Species and Critical Habitat .....	6
3.7 Industrial Facility Discharges .....	7
3.8 Non-Stormwater Discharges .....	7
3.9 Target Pollutants and Sources.....	8
<b>Part 4: Stormwater Management Program Administration.....</b>	<b>10</b>
4.1 Organizational Structure .....	10
4.2 Program Funding and Budget .....	11
4.3 Shared Responsibility .....	12
4.4 Co-Permittees.....	12
4.5 Measurable Goals for Program Administration .....	12
<b>Part 5: Public Education and Outreach Program.....</b>	<b>15</b>
<b>Part 6: Public Involvement and Participation Program.....</b>	<b>19</b>
<b>Part 7: Illicit Discharge Detection and Elimination Program.....</b>	<b>22</b>
<b>Part 8: Construction Site Runoff Control Program.....</b>	<b>28</b>
<b>Part 9: Post-Construction Site Runoff Control Program.....</b>	<b>32</b>
<b>Part 10: Pollution Prevention and Good Housekeeping Programs .....</b>	<b>46</b>

## List of Tables

Table 1: Summary of Current MS4 Mapping.....	4
Table 2: Summary of MS4 Receiving Waters.....	5
Table 3: Summary of Approved TMDLs .....	6
Table 4: Potential Federally Listed Species/Habitat Impacted by Surface Water Quality.....	7
Table 5: NPDES Stormwater Permitted Industrial Facilities .....	7
Table 6: Non-Stormwater Discharges .....	8
Table 7: Summary of Target Pollutants and Sources .....	9
Table 8: Summary of Responsible Parties .....	11
Table 9: Shared Responsibilities .....	12
Table 10: Co-Permittee Contact Information.....	12
Table 11: Program Administration BMPs.....	13
Table 12: Summary of Target Pollutants & Audiences.....	15

Table 13: Public Education and Outreach BMPs .....	15
Table 14: Public Involvement and Participation BMPs .....	19
Table 15: Illicit Discharge Detection and Elimination BMPs.....	22
Table 16: Qualifying Alternative Program Components for Construction Site Runoff Control Program ..	28
Table 17: Construction Site Runoff Control BMPs .....	29
Table 18: Qualifying Alternative Program(s) for Post-Construction Site Runoff Control Program.....	32
Table 19: Summary of Existing Post-Construction Program Elements .....	33
Table 20: Post Construction Site Runoff Control BMPs.....	34
Table 21: Pollution Prevention and Good Housekeeping BMPs .....	46

## List of Figures

Figure 1: Town Limits and ETJ .....	3
Figure 2: Existing MS4 Mapping.....	4
Figure 3: Wendell Stormwater Program Organization.....	11

## **PART 1: INTRODUCTION**

The purpose of this Stormwater Management Plan and Nutrient Management Strategy (SWMP-NMS) is to establish and define the means by which the Town of Wendell will comply with its National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permit, the requirements of the Neuse Nutrient Stormwater Rule (15A NCAC 02B .0711), 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-NMS identifies the specific elements and minimum measures that the Town of Wendell 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 NCS000564, as issued by NCDEQ. This permit covers activities associated with the discharge of stormwater and nutrients from the MS4 as owned and operated by the Town of Wendell and located within the corporate limits of the Town of Wendell. This SWMP-NMS also identifies the specific elements and minimum measures that the Town of Wendell will develop, implement, enforce, evaluate, and report to the NCDEQ Division of Water Resources (DWR) to comply with the requirements of the Neuse Rule.

In preparing this SWMP-NMS, the Town of Wendell has evaluated its MS4 and the permit requirements to develop a comprehensive 5-year SWMP-NMS 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-NMS will be evaluated and updated annually to ensure that the elements and minimum measures it contains continue to adequately provide for permit and Neuse Rule compliance and the community's needs.

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


## PART 2: CERTIFICATION

By my signature below I hereby certify, under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

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

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

Signature:	
Print Name:	MARVIN COLLINS
Title:	TOWN MANAGER
Signed this <u>28</u> day of <u>2025</u> . <u>APRIL</u>	







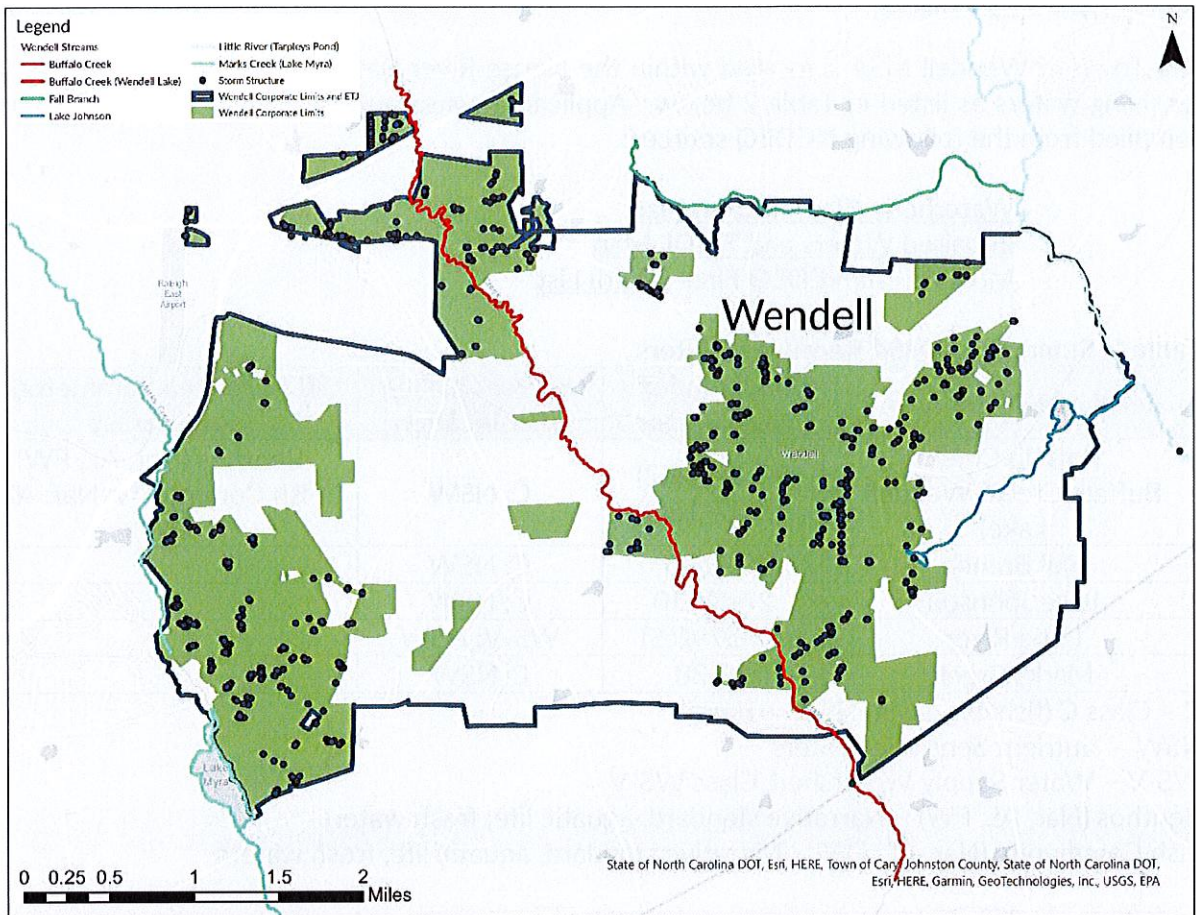


Figure 2: Existing MS4 Mapping

Table 1: Summary of Current MS4 Mapping

Percent of MS4 Area Mapped	75	%
Percent of ETJ Area Mapped	0	%
No. of Major Outfalls* Mapped	41	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.

### 3.3 Receiving Waters

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

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

**Table 2: Summary of MS4 Receiving Waters**

Receiving Water Name	Stream Index / AU Number	Water Quality Classification	303(d) Listed Parameter(s) of Interest
Buffalo Creek Buffalo Creek (Wendell Lake)	27-57-16(2) 27-57-16(3)	C; NSW	Benthos (Nar, AL, FW) Fish Community (Nar, AL, FW)
Fall Branch	27-57-9	C; NSW	
Lake Johnson	27-57-10	C; NSW	
Little River	27-57-(8.5)	WS-V; NSW	
Marks Creek	27-38	C-NSW	

C – Class C (fishable/swimmable waters)

NSW – Nutrient Sensitive Waters

WS-V – Water Supply Watershed, Class WS-V

Benthos (Nar, AL, FW) – Narrative standard, aquatic life, fresh waters

Fish Community (Nar, AL, FW) – Narrative standard, aquatic life, fresh waters

Buffalo Creek is listed with benthos as a 303(d) List parameter of concern, which indicates that the benthic community has a fair, poor, or severe bio classification. The ability of the stream to support a diverse community of benthic organisms is related to the overall health of the stream.

### 3.4 MS4 Interconnection

The Town of Wendell MS4 is interconnected with another regulated MS4 and directly receives and/or discharges stormwater from the North Carolina Department of Transportation (NCDOT) MS4. These connections include:

- a. The interconnection is receiving stormwater from the NCDOT MS4. The number of interconnections is unknown.
- b. The interconnection is discharging stormwater into the NCDOT MS4. The number of interconnections is unknown.
- c. The Town of Wendell MS4 mapping does not identify interconnections with the NCDOT MS4.
- d. The Town of Wendell MS4 mapping does not include NCDOT MS4 outfalls.

The number of interconnections entering and leaving the Town of Wendell MS4 from NCDOT will be established through BMP **Error! Reference source not found.**, as determined by GIS analysis of outfalls on DOT roads.



### 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	Nitrogen	N	N
Statewide	Mercury	N	N

The entirety of the Town of Wendell and its ETJ is located within the Neuse River Watershed, which is impaired for nitrogen and subject to a total maximum daily load (TMDL). A statewide TMDL for mercury applies to all surface waters in the state but does not require any actions by the Town as most mercury in stormwater comes from atmospheric deposition. While the Statewide TMDL for mercury does not require any actions by the NPDES stormwater permittee because most mercury in stormwater comes from atmospheric deposition, the Town utilizes BMPs to provide information to the public.

### 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 [Endangered and Threatened Species and Species of Concern by County for North Carolina Map](#) and [Listed species believe to or known to occur in North Carolina map](#) as provided by the [U.S. Fish and Wildlife Service, the species listed in Table 4 have the potential to occur within the regulated MS4 urbanized area](#). Of those species listed, Table 4 summarizes the species that may be significantly impacted by the quality of surface waters within their habitat.

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

Scientific Name	Common name	Species Group	Federal Listing Status
<i>Haliaeetus leucocephalus</i>	Bald Eagle	Vertebrate	BGPA
<i>Picoides borealis</i>	Red-Cockaded Woodpecker	Vertebrate	E
<i>Necturus lewisi</i>	Neuse River Water Dog	Vertebrate	ARS
<i>Noturus furiosus</i>	Carolina Madtom	Vertebrate	ARS
<i>Fusconaia masoni</i>	Atlantic Pigtoe	Clam	ARS
<i>Alasmidonta heterodon</i>	Dwarf Wedgemussel	Clam	E
<i>Elliptio steinstansana</i>	Tar River Spiny Mussel	Clam	E
<i>Elliptio lanceolata</i>	Yellow Lance	Clam	ARS
<i>Rhus michauxii</i>	Michaux's Sumac	Flowering plant	E

ARS – At Risk Species

BGPA – Bald and Golden Eagle Protection Act

E – Endangered

### 3.7 Industrial Facility Discharges

The Town of Wendell MS4 jurisdictional area includes the following industrial facilities which hold NPDES Industrial Stormwater Permits, as determined from the [NCDEQ Maps & Permit Data web page](#). Facilities were identified by location address, but all industrial sites were not mapped to determine which sites are in the ETJ.

The Town prioritizes industrial sites for inspections as part of the Illicit Discharge Detection and Elimination Program.

**Table 5: NPDES Stormwater Permitted Industrial Facilities**

Permit Number	Facility Name
NCG060404	Mahoney Environmental
NCG030668	Siemens Industry, Inc.
NCG030667	VPG Micro-Measurements

### 3.8 Non-Stormwater Discharges

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

Street washing discharges are addressed under the Pavement Management Program in Part 10 of this SWMP-NMS. The Town of Wendell recognizes street washing with a sustained flow of water will have a negative impact to the MS4, and therefore utilizes dry sweeping methods wherever possible. The Town of Wendell utilizes street sweepers with metal brushes which do utilize

sprayed water to reduce the possibility of fugitive dust and to assist in collection of material. Street sweeping waste is disposed of in a commercial waste dumpster at the Public Works Yard per the Municipal Pollution Prevention and Good Housekeeping Plan.

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 Wendell to determine whether they may significantly impact water quality. The Town utilizes Public Education and Outreach and Pollution Prevention and Good Housekeeping BMPs to educate residents and municipal staff on the possible effects of detergents entering the surface waters.

**Table 6: Non-Stormwater Discharges**

<b>Non-Stormwater Discharge</b>	<b>Water Quality Impacts</b>
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	<b>Possible</b>
Flows from riparian habitats and wetlands	Incidental
Dechlorinated swimming pool discharges	Incidental
Street wash water	<b>Possible</b>
Flows from firefighting activities	Incidental

### 3.9 Target Pollutants and Sources

In addition to those target pollutants identified above, the Town of Wendell 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-NMS, the likely activities/sources/targeted audiences attributed to each pollutant and identifies the associated SWMP-NMS programs that address each. In addition, the Town of Wendell has evaluated schools, homeowners and businesses as target audiences that are likely to have significant stormwater impacts. The audiences are targeted for Public Education and Outreach as they are likely pollutant sources.

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

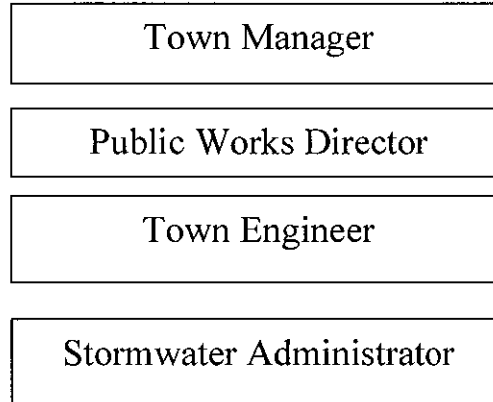
<b>Target Pollutant(s)</b>	<b>Likely Source(s)/Target Audience(s)</b>	<b>SWMP Program Addressing Target Pollutant(s)/Audience(s)</b>
Litter	Residential, Commercial, Schools	Public Education & Outreach, Public Involvement & Participation
Yard Waste	Residential, Commercial, Municipal Operations	Public Education & Outreach, Pollution Prevention and Good Housekeeping
Sediment	Construction, Commercial, Gravel Driveways, Municipal Operations	Public Education & Outreach, Construction Site Runoff Control, Post-Construction Site Runoff Control, Pollution Prevention and Good Housekeeping
Fecal Coliform	Sewer Overflows, Failing Septic Systems, Pet Waste, Wildlife, Illicit Discharges	Public Education & Outreach, Illicit Discharge Detection and Elimination
Neuse River Nitrogen TMDL	Residential, Commercial, Municipal Operations	Public Education & Outreach, Post-Construction Site Runoff Control, Pollution Prevention and Good Housekeeping
Mercury/Statewide TMDL	Atmospheric Deposition	Public Education & Outreach
General Non-Point Source Pollution	Residential, Commercial, Industrial, Municipal Operations	Public Education & Outreach, Post-Construction Site Runoff Control, Pollution Prevention and Good Housekeeping
Illicit Discharges	Residential, Commercial, Industrial, Municipal Operations	Public Education & Outreach, Public Involvement & Participation, Illicit Discharge Detection and Elimination, Pollution Prevention and Good Housekeeping
Illegal Dumping	Residential, Commercial, Industrial, Municipal Operations	Public Education & Outreach, Public Involvement & Participation, Illicit Discharge Detection and Elimination, Pollution Prevention and Good Housekeeping
Improper Disposal of Waste	Residential, Commercial, Industrial, Municipal Operations	Public Education & Outreach, Public Involvement & Participation, Illicit Discharge Detection and Elimination, Pollution Prevention and Good Housekeeping



## PART 4: STORMWATER MANAGEMENT PROGRAM ADMINISTRATION

### 4.1 Organizational Structure

The Public Works Department management team oversees field implementation of the SWMP.



**Figure 3: Wendell Stormwater Program Organization**

**Table 8: Summary of Responsible Parties**

<b>SWMP-NMS Component</b>	<b>Responsible Position</b>	<b>Staff Name</b>	<b>Department</b>
Stormwater Program Administration	Stormwater Program Administrator	Darby Bishop	Public Works
SWMP-NMS Management	Stormwater Program Administrator	Darby Bishop	Public Works
Public Education & Outreach	Stormwater Program Administrator	Darby Bishop	Public Works
Public Involvement & Participation	Stormwater Program Administrator	Darby Bishop	Public Works
Illicit Discharge Detection & Elimination	Stormwater Program Administrator	Darby Bishop	Public Works
Construction Site Runoff Control	Stormwater Program Administrator	Darby Bishop	Public Works
Post-Construction Stormwater Management	Stormwater Program Manager	Darby Bishop	Public Works
Pollution Prevention/Good Housekeeping for Municipal Operations	Stormwater Program Administrator	Darby Bishop	Public Works
Municipal Facilities Operation & Maintenance Program	Stormwater Program Administrator	Darby Bishop	Public Works
Spill Response Program	Stormwater Program Administrator	Darby Bishop	Public Works
MS4 Operation & Maintenance Program	Stormwater Program Manager	Darby Bishop	Public Works
Municipal SCM Operation & Maintenance Program	Stormwater Program Administrator	Darby Bishop	Public Works
Pesticide, Herbicide & Fertilizer Management Program	Facilities Supervisor	Dakota Honeycutt	Public Works
Vehicle & Equipment Cleaning Program	Fleet Supervisor	Sam Trussler	Public Works
Pavement Management Program	Stormwater Program Administrator	Darby Bishop	Public Works
Total Maximum Daily Load (TMDL) Requirements	Stormwater Program Administrator	Darby Bishop	Public Works

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

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

The Town of Wendell is currently funding the Stormwater Program Manager, a Crew Leader and three Operations Specialists from the Public Works budget. All stormwater related equipment and projects are also funded through the Public Works budget. Wendell has implemented a stormwater fee for properties within the area covered by the MS4.

#### 4.3 Shared Responsibility

The Town of Wendell 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 Wendell 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 Wendell 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-NMS 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**

<b>SWMP-NMS BMP or Permit Requirement</b>	<b>Implementing Entity &amp; Program Name</b>	<b>Legal Agreement (Y/N)</b>
Public Education and Outreach/ Public Involvement and Participation	Clean Water Education Partnership (CWEP)	Y
Construction Site Runoff Control/ Post-Construction Site Runoff Control	Wake County – Water Quality Division	Y

#### 4.4 Co-Permittees

There are no other entities applying for co-permittee status under the NPDES MS4 permit number NCS000564 for the Town of Wendell. Table 10 summarizes contact information for each co-permittee.

**Table 10: Co-Permittee Contact Information**

<b>Co-Permittee MS4 Name</b>	<b>Contact Person</b>	<b>Phone &amp; E-Mail</b>	<b>Interlocal Agreement (Y/N)</b>
N/A			

#### 4.5 Measurable Goals for Program Administration

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

**Table 11: Program Administration BMPs**

<b>Permit Ref.</b>	<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.			
<b>BMP No.</b>	<b>A</b> <b>Description of BMP</b>	<b>B</b> <b>Measurable Goal(s)</b>	<b>C</b> <b>Schedule for Implementation</b>	<b>D</b> <b>Annual Reporting Metric</b>
<b>1.</b>	<b>Annual Self-Assessment</b>			
	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
<b>2.</b>	<b>Shared Responsibility (Permit Ref. 1.4)</b>			
	Agreements with entities operating on behalf of the town/city of Wendell 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.	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
<b>3.</b>	<b>Minimum Control Measures (Permit Ref. 2.2.2)</b>			
	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.	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
<b>4.</b>	<b>Funding and Staffing (Permit Ref. 2.1.1)</b>			
	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.	1. Review and analyze the current funding and staffing of the program.	1. Annually	1. Adequate/inadequate
<b>Permit Ref.</b>	<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.			



**Table 11: Program Administration BMPs**

<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
5.	<b>Permit Renewal Application</b>			
	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 Wendell 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-NMS, which will be addressed by the Public Education and Outreach Program, are summarized in Table below. In addition, the Town of Wendell is required to inform businesses and the general public of the hazards associated with illicit discharges, illegal dumping, and improper disposal of waste.

**Table 12: Summary of Target Pollutants & Audiences**

Target Pollutants/Sources	Target Audience(s)
Litter	Residential, Commercial, Schools
Yard Waste	Residential, Commercial, Municipal Operations
Sediment	Construction, Commercial, Gravel Driveways, Municipal Operations
Fecal Coliform	Sewer Overflows, Failing Septic Systems, Wildlife, Illicit Discharges
Neuse River Nitrogen TMDL	Residential, Commercial, Municipal Operations
Mercury/Statewide TMDL	Atmospheric Deposition
General Non-Point Source Pollution	Residential, Commercial, Industrial, Municipal Operations
Illicit Discharges	Residential, Commercial, Industrial, Municipal Operations
Illegal Dumping	Residential, Commercial, Industrial, Municipal Operations
Improper Disposal of Waste	Residential, Commercial, Industrial, Municipal Operations

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

**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 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	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric

**Table 13: Public Education and Outreach BMPs**

6.	<b>Partnership with CWEP</b>			
	The Town will continue to partner with CWEP to develop and distribute stormwater educational materials and host volunteer events. Materials and events will be evaluated to determine if target pollutants, target audiences, and water quality issues are addressed. The Town will also ensure the legal agreement is up to date and document activities performed by CWEP within the Town	1. Review CWEP educational materials to determine gaps in programming for target pollutants	1. Permit Year 1	1. Completed? (Yes/No/Status)
		2. Maintain legal agreement with CWEP, Monitor and document CWEP activities to ensure partnership commitments are met	2. Annually, for Permit Years 1 - 5	2. Completed? (Yes/No/Status)
7.	<b>Stormwater Program Handout</b>			
	The Town will distribute an educational handout with information about the stormwater program at least once during the permit term. The handout should include information not covered by CWEP	1. Perform 8 stormwater outreach events	1. Permit Year 2	1. Completed? (Yes/No/Status) Contact Hrs.
		2. Distribute the handout on the Town message board	2. Permit Year 2	2. Completed? (Yes/No/Status),
8.	<b>Local Neuse Program Education and Outreach</b>			
	Develop educational materials to target property owners' associations regarding the Local Neuse Nitrogen Program	1. Develop or identify educational resources for property owners' associations and the general public regarding built upon area (BUA) limits and the need for adequate stormwater control measure maintenance	1. Permit Year 2	1. Completed? (Yes/No/Status)
		2. Post educational resources on the Town's stormwater web page and message board	2. Permit Year 2	2. Completed? (Yes/No/Status)

<b>Permit Ref.</b>	<b>2.1.7, 3.2.3 and 3.6.5(c): Web Site</b> 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-NMS. The web page shall also provide developers with all relevant post-construction requirements, design standards, checklists and/or other materials.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
<b>9.</b>	<b>Stormwater Page on Town Website</b>			
	The web page will provide information about the Town's stormwater program. This will include educational information related to target pollutants and audiences, water quality, a copy of the updated SWMP, applicable ordinances, and information for developers. Information on how to report illicit discharges and sediment issues including the Stormwater Hotline, Wake County Erosion Control and plan review contact information will also be included	1. Establish a developer stormwater resources section on the Town stormwater web page that links to Wake County plan review information, Develop or identify a handout for developers that describes the new post-construction requirements related to the Neuse Nutrient Management Strategy and post on the Town stormwater web page	1. Permit Year 1	1. Completed? (Yes/No/Status)
		2. Upload the updated SWMP to the Town stormwater web page	2. Permit Year 1	2. Completed? (Yes/No/Status)
		3. Maintain the webpage - update any broken links and update with new educational material	3. Annually, for Permit Years 1 – 5	3. Completed? (Yes/No/Status)



<b>Permit Ref.</b>	<b>3.2.5: Stormwater Hotline</b> Measures for a stormwater hotline/helpline for the purpose of public education and outreach.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
<b>10.</b>	<b>Stormwater Hotline</b>			
	The Town will establish and maintain a stormwater email and hotline telephone number for citizens to inquire about stormwater and report stormwater issues	1. Develop a standard operating procedure (SOP) for hotline and email response	1. Permit Year 1	1. Completed? (Yes/No/Status)
		2. Train staff on hotline and email SOP	2. Annually, for Permit Years 1 - 5	2. Number of staff trained
		3. Establish a tracking mechanism and document number of emails and calls to the hotline	3. Permit year 4	3. Number of emails/calls to the hotline annually

## PART 6: PUBLIC INVOLVEMENT AND PARTICIPATION PROGRAM

This SWMP-NMS 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 Wendell will manage, implement, and report the following public involvement and participation BMPs.

Table 14: 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 No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
11.	Stormwater Input at Planning Board			
	Public input will be solicited at an annual Planning Board Meeting dedicated to stormwater issues in Wendell	1. Schedule an annual Planning Board Meeting dedicated to stormwater issues Advertise the board meeting on the Town message board and Town website	1. Annually, for Permit Years 1 – 5	1. Date of meeting Date posted to the message board and website

**Table 14: Public Involvement and Participation BMPs**

12.	<b>Stormwater Page on Town Website</b>			
	The web page will provide information about the Town's stormwater program. This will include educational information related to target pollutants and audiences, water quality, a copy of the updated SWMP, applicable ordinances, and information for developers. Information on how to report illicit discharges and sediment issues including the Stormwater Hotline, Wake County Erosion Control and plan review contact information will also be included	1. Establish a developer stormwater resources section on the Town stormwater web page that links to Wake County plan review information, Develop or identify a handout for developers that describes the new post-construction requirements related to the Neuse Nutrient Management Strategy and post on the Town stormwater web page	1. Permit Year 1	1. Completed? (Yes/No/Status)
		2. Upload the updated SWMP to the Town stormwater web page	2. Permit Year 1	2. Completed? (Yes/No/Status)
		3. Maintain the webpage - update any broken links and update with new educational material	3. Annually, for Permit Years 1 – 5	3. Completed? (Yes/No/Status)
13.	<b>Stormwater Hotline</b>			
	The Town will establish and maintain a stormwater email and hotline telephone number for citizens to inquire about stormwater and report stormwater issues	1. Develop a standard operating procedure (SOP) for hotline and email response	1. Permit Year 1	1. Completed? (Yes/No/Status)
		2. Train staff on hotline and email SOP	2. Annually, for Permit Years 1 – 5	2. Number of staff trained

Table 14: Public Involvement and Participation BMPs				
		3. Establish a tracking mechanism and document number of emails and calls to the hotline	3. Permit year 4	3. Number of emails/calls to the hotline annually
<b>Permit Ref.</b>	<b>3.3.2: Volunteer Opportunities</b> Measures to provide volunteer opportunities designed to promote ongoing citizen participation.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
14.	<b>Storm Drain Stenciling</b>			
	The Town will host storm drain stenciling events to engage and educate the public on the storm sewer system in Wendell and how it drains to surface waters	1. During regular system maintenance, identify areas where drains could be stenciled by volunteers	1. Annually, for Permit Years 1 – 5	1. Number of areas identified for potential stenciling
		2. Coordinate storm drain stenciling event	2. Permit Year 3	2. Number of attendees
15.	<b>Stream Cleanups</b>			
	The Stormwater Department will partner with the Town Parks Department and CWEP to organize an annual stream clean up as part of Creek Week	1. Identify streams to target for cleanups	1. Annually, for Permit Years 1 – 5	1. Completed? (Yes/No/Status)
		2. Host stream clean up	2. Annually, for Permit Years 1 – 5	2. Report date of cleanup and number of attendees
16.	<b>Partnership with CWEP</b>			
	The Town will continue to partner with CWEP to develop and distribute stormwater educational materials and host volunteer events. Materials and events will be evaluated to determine if target pollutants, target audiences, and water quality issues are addressed. The Town will also ensure the legal agreement is up to date and document activities performed by CWEP within the Town	1. Review CWEP educational materials to determine gaps in programming for target pollutants	1. Permit Year 1	1. Completed? (Yes/No/Status)
		2. Maintain legal agreement with CWEP, Monitor and document CWEP activities to ensure partnership commitments are met	2. Annually, for Permit Years 1 – 5	2. Completed? (Yes/No/Status)



## PART 7: ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM

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

Table 15: Illicit Discharge Detection and Elimination BMPs				
<b>Permit Ref.</b>	<b>3.4.1: MS4 Map</b> 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.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
17.	<b>Continual Updates to MS4 Map</b>			
	Update MS4 map to identify major outfalls, receiving streams, flow directions, zoning land use, and known septic systems. When new outfalls are identified or new development is constructed, the map will be updated. A developer checklist will be created to ensure all new developments are added to the map. Utilize the Town-owned camera to begin to document condition of the storm system	1. Review and add major outfalls and receiving streams to the map	1. Permit Year 1	1. Number of major outfalls added to map
		2. Add receiving streams to the map	2. Permit Year 1	2. Completed? (Yes/No/Status)
		3. Coordinate with Wake County to identify the location of existing SCMs and add to map	3. Permit Year 1	3. Number of SCMs added to map
		4. Add flow direction of stormwater infrastructure to the map	4. Permit Year 2	4. Completed? (Yes/No/Status)
		5. Identify interconnections with NCDOT and add to map	5. Permit Year 2	5. Number of connections
		6. When new conveyances and outfalls are located or constructed add them to the map	6. Annually, for Permit Years 2-5	6. Number of new outfalls identified and added to the map
<b>Permit Ref.</b>	<b>3.4.2: Regulatory Mechanism</b> 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.			
	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>

BMP No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
18.	<b>Adopt Updated IDDE Ordinance</b>			
	Update Wendell Unified Ordinance to provide legal authority to prohibit, detect, and eliminate illicit connections and discharges including enforcement procedures and actions. Ensure ordinance requires proper disposal of waste from construction sites	1. Draft an ordinance update	1. Permit Year 1	1. Completed? (Yes/No/Status)
		2. Present draft ordinance to Town Board for review and document comments	2. Permit Year 1	2. Completed? (Yes/No/Status)
		3. Adopt ordinance	3. Permit year 1	3. Date adopted
		4. Review	4. Permit Years 1 – 5	4. Completed? (Yes/No/Status)
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: <ul style="list-style-type: none"> <li>a) Locate priority areas likely to have illicit discharges,</li> <li>b) Conduct routine dry weather outfall inspections,</li> <li>c) Identify illicit discharges and trace sources,</li> <li>d) Eliminate the source(s) of an illicit discharge, and</li> <li>e) Evaluate and assess the IDDE Program.</li> </ul>			
BMP No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
19.	<b>IDDE Plan</b>			
	Develop a written IDDE plan that includes SOPs for investigation of illicit discharges	1. Develop criteria for identifying chronic violators and “hot spots” by owner/operator and location	1. Permit Year 1	1. Completed? (Yes/No/Status)
		2. Develop the written plan	2. Permit Year 1	2. Completed? (Yes/No/Status)
20.	<b>Major Outfall Inspections</b>			
	Perform regular dry weather (no rain in previous 72 hours) major outfall inspections to proactively	1. Review and add major outfalls and receiving streams to the map	1. Permit Year 1	1. Number of major outfalls added to map

	identify illicit discharges and illicit connections	2. Split major outfalls into two groups for inspection: so that with one group inspected per year, all major outfalls will be inspected every other year, Inspect one group of outfalls annually in dry weather conditions and document any potential violations as well as condition of outfall	2. Permit Year 1 then annually after groups identified, for Permit Years 1-5	2. Completed? (Yes/No/Status) number of outfalls inspected
		3. Perform additional inspections of chronic violators	3. Annually, for Permit Years 1-5	3. Report number of inspections performed
		4. Non-major outfalls are to be screened	4. Once per permit cycle	4. Completed? (Yes/No/Status) number of outfalls inspected
21.	<b>IDDE Program Evaluation</b>			
	Yearly evaluation of IDDE program to promote continuance of effective components and improvement in areas that are lacking, as well as identification of potential "hot spot" areas	1. Evaluate the plan with Town stormwater stakeholders including public works director	1. Annually, for Permit Years 1-4	1. Completed? (Yes/No/Status)

<b>Permit Ref.</b>	<b>3.4.4: IDDE Tracking</b> 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.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
22.	<b>Tracking in Accela</b>			
	IDDE inspection and responses are tracked in Accela (the Town's work order tracking system) including the date, results of the investigation, any follow-up of the investigation, the date the investigation was closed, and the issuance of enforcement actions	1. Continue to document illicit discharge inspections	1. Continuously	1. Number of reports; number of investigations; number of enforcement actions
<b>Permit Ref.</b>	<b>3.4.5: Staff IDDE Training</b> 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.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
23.	<b>Staff IDDE Training</b>			
	Develop a program to educate Town staff of indicators of potential illicit discharges/connections and illegal dumping and the appropriate avenues through which to report suspected illicit discharge	1. Train appropriate staff	1. Permit Year 2	1. Date of training, number of staff trained
		2. Train new staff when hired	2. Annually, for Permit Years 2-5	2. Date of training, number of staff trained

<b>Permit Ref.</b>	<b>3.4.6: IDDE Reporting</b> 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.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
<b>24.</b>	<b>Stormwater Page on Town Website</b>			
	The web page will provide information about the Town's stormwater program. This will include educational information related to target pollutants and audiences, water quality, a copy of the updated SWMP, applicable ordinances, and information for developers. Information on how to report illicit discharges and sediment issues including the Stormwater Hotline, Wake County Erosion Control and plan review contact information will also be included	1. Establish a developer stormwater resources section on the Town stormwater web page that links to Wake County plan review information, Develop or identify a handout for developers that describes the new post-construction requirements related to the Neuse Nutrient Management Strategy and post on the Town stormwater web page	1. Permit Year 1	1. Completed? (Yes/No/Status)
		2. Upload the updated SWMP to the Town stormwater web page	2. Permit Year 1	2. Completed? (Yes/No/Status)
		3. Maintain the webpage - update any broken links and update with new educational material	3. Annually, for Permit Years 1 – 5	3. Completed? (Yes/No/Status)
<b>25.</b>	<b>Stormwater Hotline</b>			
	The Town will establish and maintain a stormwater email and hotline telephone number for citizens to inquire about	1. Develop a standard operating procedure (SOP) for hotline and email response	1. Permit Year 1	1. Completed? (Yes/No/Status)

	stormwater and report stormwater issues	2. Train staff on hotline and email SOP	2. Annually, for Permit Years 1 – 5	2. Number of staff trained
		3. Establish a tracking mechanism and document number of emails and calls to the hotline	3. Permit year 4	3. Number of emails/calls to the hotline annually



## PART 8: CONSTRUCTION SITE RUNOFF CONTROL PROGRAM

In accordance with 15A NCAC 02H .0153, the Town of Wendell 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	Wake County Delegated SPCA Program*	15A NCAC Chapter 04, Interlocal Agreement	Wake County

\*The local delegated SPCA Program ordinance can be found at:

<https://www.wakegov.com/departments-government/water-quality-programs/watershed-management-erosion-sedimentation-control-floodplain-and-stormwater-management/sedimentation-and-erosion-control>

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

**Table 17: Construction Site Runoff Control BMPs**

<b>Permit Ref.</b>	<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.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
<b>26.</b>	<b>Municipal Staff Training</b>			
	Train municipal staff who receive calls from the public on the protocols for referral and tracking of construction site runoff control complaints and staff who may encounter erosion and sedimentation problems in their day-to-day work functions	1. Train municipal staff on proper handling of construction site runoff control complaints	1. Permit Year 1	1. Number of staff trained, training date(s), and topics covered
		2. Train municipal staff who may encounter violations in the field on identification and proper reporting of erosion and sedimentation problems in Acela and to Wake County	2. Permit Year 1	2. Number of staff trained, training date(s), and topics covered

**Table 17: Construction Site Runoff Control BMPs**

Stormwater Page on Town Website				
27.	<p>The web page will provide information about the Town's stormwater program. This will include educational information related to target pollutants and audiences, water quality, a copy of the updated SWMP, applicable ordinances, and information for developers. Information on how to report illicit discharges and sediment issues including the Stormwater Hotline, Wake County Erosion Control and plan review contact information will also be included</p>	1. Establish a developer stormwater resources section on the Town stormwater web page that links to Wake County plan review information, Develop or identify a handout for developers that describes the new post-construction requirements related to the Neuse Nutrient Management Strategy and post on the Town stormwater web page	1. Permit Year 1	1. Completed? (Yes/No/Status)
		2. Upload the updated SWMP to the Town stormwater web page	2. Permit Year 1	2. Completed? (Yes/No/Status)
		3. Maintain the webpage - update any broken links and update with new educational material	3. Annually, for Permit Years 1 - 5	3. Completed? (Yes/No/Status)

	<b>Stormwater Hotline</b>			
28.	The Town will establish and maintain a storm water email and hotline telephone number for citizens to inquire about stormwater and report stormwater issues	1. Develop standard operating procedure (SOP) for hotline and email response	1. Permit Year 1	1. Completed? (Yes/No/Status)
		2. Train staff on hotline and email SOP.	2. Annually, for Permit Years 1-5	2. Number of staff trained
		3. Establish a tracking mechanism and document number of emails and calls to the hotline	3. Permit year 4	3. Number of emails/calls to the hotline annually
<b>Permit Ref.</b>	<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.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
29.	<b>Adopt Updated IDDE Ordinance</b>			
	Update Wendell Unified Ordinance to provide legal authority to prohibit, detect, and eliminate illicit connections and discharges including enforcement procedures and actions. Ensure ordinance requires proper disposal of waste from construction sites	1. Draft an ordinance update	1. Permit Year 1	1. Completed? (Yes/No/Status)
		2. Present draft ordinance to Town Board for review and document comments	2. Permit Year 1	2. Completed? (Yes/No/Status)
		3. Adopt ordinance	3. Permit year 1	3. Date adopted
		4. Review	4. Permit Years 1 - 5	4. Completed? (Yes/No/Status)

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

This SWMP-NMS 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 Wendell 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 Wendell 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
Neuse River Basin Nutrient Sensitive Waters Management Strategy (Neuse NMS)	15A NCAC 2B .0235	Post-Construction Ordinance will be amended with newly adopted rules

The post-construction program including the NSW Rules apply throughout the Town limits and ETJ. As part of the ordinance update, Wendell has determined to track built-upon area (BUA) for projects by recording permitted and maximum allowed BUA on the plat. For residential developments, BUA additions can then be processed through an application with the Building Department. Residential, single lot developments without a plat will need to provide documentation of BUA limits prior to initial building permit issuance. BUA additions for these projects will then be processed through an application with the Building Department. Additions for non-residential development will be routed through the Planning Department for updates to the stormwater management plan. A BUA policy document will be drafted as part of BMP **Error! Reference source not found..**

Wake County performs post-construction plan reviews under the ILA from project initiation to as-built inspections. Requirements for post-construction reviews performed by Wake County are found on the County website: <https://www.wakegov.com/departments-government/water-quality-programs/watershed-management-erosion-sedimentation-control-floodplain-and-stormwater-management/stormwater-plan-review-and-permitting/town-wendell-submittal-requirements>

The Town of Wendell 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**

<b>Permit Requirements for Plan Review and Approval</b>	<b>Municipal Ordinance/Code Reference(s) and/or Document Title(s)</b>	<b>Date Adopted</b>
3.6.2(a) Authority	Wendell UDO Chapter 6	4/22/2024
3.6.3(a) & 15A NCAC 02H.0153(c) Federal, State & Local Projects	Wendell UDO Chapter 6	4/22/2024
3.6.3(b) Plan Review	Wendell UDO Chapter 6	4/22/2024
3.6.3(c) O&M Agreement	Wendell UDO Chapter 6	4/22/2024
3.6.3(d) O&M Plan	Wendell UDO Chapter 6	4/22/2024
3.6.3(e) Deed Restrictions/Covenants	Wendell UDO Chapter 6	4/22/2024
3.6.3(f) Access Easements	Wendell UDO Chapter 6	4/22/2024
<b>Permit Requirements for Inspections and Enforcement</b>	<b>Municipal Ordinance/Code Reference(s) and/or Document Title(s)</b>	<b>Date Adopted</b>
3.6.2(b) Documentation	Wendell UDO Chapter 6	4/22/2024
3.6.2(c) Right of Entry	Wendell UDO Chapter 6	4/22/2024
3.6.4(a) Pre-CO Inspections	Wendell UDO Chapter 6	4/22/2024
3.6.4(b) Compliance with Plans	Wendell UDO Chapter 6	4/22/2024
3.6.4(c) Annual SCM Inspections	Wendell UDO Chapter 6	4/22/2024
3.6.4(d) Low Density Inspections	Wendell UDO Chapter 6	4/22/2024
3.6.4(e) Qualified Professional	Wendell UDO Chapter 6	4/22/2024
<b>Permit Requirements for Fecal Coliform Reduction</b>	<b>Municipal Ordinance/Code Reference(s) and/or Document Title(s)</b>	<b>Date Adopted</b>
3.6.6(a) Pet Waste	Wendell UDO Chapter 6	4/22/2024
3.6.6(b) On-Site Domestic Wastewater Treatment	Wendell UDO Chapter 6 (Refers to Wake County Ordinance)	4/22/2024

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



**Table 20: Post Construction Site Runoff Control BMPs**

Permit Ref.	3.6.5(a), 3.6.5(b), and 4.1.3: Minimum Post-Construction Reporting Requirements Measures to document activities over the course of the fiscal year (July 1 – June 30) including appropriate information to accurately describe progress, status, and results.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
30.	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. Determine a method for sharing data between Wendell and Wake County and implement	1. Permit Year 1	1. Completed? (Yes/No/Status)
		2. Track number of low-density and high-density plan reviews performed. Include the number and type of SCMs included in the plans	2. Continuously	2. Number of plan reviews performed for low-density and high-density and number of SCMs
		3. Track number of low-density and high-density plans approved. Include the number and type of approved constructed SCMs	3. Continuously	3. Number of plan approvals issued for low-density and high-density and number of SCMs
		4. Track number and type of construction-phase stormwater inspections performed (SCM and BUA)	4. Continuously	4. Number and type of construction-phase stormwater inspections
Data Used in Nutrient Calculations				

**Table 20: Post Construction Site Runoff Control BMPs**

31.	Collect input data used for the calculation of nutrient export and reduction by SCMs for all development sites subject to .0711 and submit as an appendix for the Local Program's Annual Report. Data will be submitted by developers using the NCDEQ Stormwater Nitrogen and Phosphorus (SNAP) Tool, which will be reviewed and reported to NCDEQ annually	1. Determine a method for sharing data between Wendell and Wake County and implement	1. Permit Year 1	1. Completed? (Yes/No/Status)
		2. Export SNAP Tool input data from each development upon approval of stormwater permit/stormwater management plan	2. Continuously	2. Number of SNAP Tool txt files exported
		3. Export adjusted SNAP input data from development where changes to an existing permitted stormwater permit/stormwater management plan is required to account for changes in land cover	3. Annually, for Permit Years 1 – 5	3. Number of revised SNAP Tool txt files exported and location and number of developments with revised data
		4. Submit SNAP data to NCDEQ as part of annual reporting by October 30 each year	4. Annually, for Permit Years 1 – 5	4. Completed? (Yes/No/Status)
Permit Ref.	2.3 and 3.6: 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
32.	Neuse NMS Requirements			
	Adopt measures to implement the Neuse NMS Requirements	1. Update Ordinance	1. Continuously	1. Completed? (Yes/No/Status)

Table 20: Post Construction Site Runoff Control BMPs				
		2. Update Wake County ILA	2. Continuously	2. Completed? (Yes/No/Status)
		3. Update CWEP Agreement	3. Continuously	3. Completed? (Yes/No/Status)
Permit Ref.	<b>3.6.2: Legal Authority</b> 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
33.	<b>Ordinance Updates and Policy Development</b>			
	Update ordinance to include Neuse NMS requirements. Ordinance needs to be at least as stringent as Neuse Rule requirements for applicability, nutrient targets, and stormwater requirements and needs to specify the calculation method and procedures for nutrient offset. Ensure the ordinance includes the authority to perform low-density and BUA inspections. Also ensure the ordinance requires compliance with Nutrient Management Strategy by Federal, State, and Local government projects. Reviews will be performed by the State	1. Revise ordinance to meet Neuse NMS requirements and adopt	1. Permit Year 1	1. Completed? (Yes/No/Status)
		2. Revise ordinance to ensure authority to perform low-density and BUA inspections	2. Permit Year 1	2. Completed? (Yes/No/Status)
		3. Revise code to require NCDEQ Stormwater Program review for all Federal, State, and Local Government projects	3. Permit Year 1	3. Completed? (Yes/No/Status)
		4. Develop policy documents for program implementation including BUA tracking, performance security issuance, and SCM inspections and post to stormwater web page	4. Permit Year 1	4. Date documents published and date uploaded to web page

**Table 20: Post Construction Site Runoff Control BMPs**

ILA with Wake County				
34.	Establish and maintain an ILA with Wake County to implement post-construction reviews. A checklist or flow chart will be developed that covers the entire review process from project initiation to project close-out	1. Develop and implement a flow chart or checklist that indicates which party is responsible for each step of the post-construction review and approval process including job titles and contact information	1. Permit Year 1	1. Completed? (Yes/No/Status)
		2. Determine a method for sharing data between Wendell and Wake County and implement	2. Permit Year 1	2. Completed? (Yes/No/Status); date implemented
		3. Draft and execute the ILA	3. Permit Year 1	3. Completed? (Yes/No/Status); date executed
		4. Host a joint Town and County training session to review the flow chart or checklist, updated ordinance, and policy documents	4. Permit Year 1	4. Date training hosted
		5. Review the flow chart/checklist and data sharing method and update if necessary	5. Annually, for Permit Years 2-5	5. Completed? (Yes/No/Status); report any revisions required

**Table 20: Post Construction Site Runoff Control BMPs**

<b>Permit Ref.</b>	<b>3.6.3: Plan Review and Approval</b> 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).			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
<b>35.</b>	<b>Federal, State, Local Government Plan Review</b>			
	Ensure local ordinance specifically requires compliance with Nutrient Management Strategy by Federal, State, and Local government projects. Reviews will be performed by the State	1. Revise code to require NCDEQ Stormwater Program review for all Federal, State, and Local Government projects	1. Permit Year 1	1. Completed? (Yes/No/Status)
		2. Notify DEMLR Central Office (Stormwater Program Supervisor) and Raleigh Regional Office of this code revision	2. Permit Year 1	2. Completed? (Yes/No/Status)
<b>36.</b>	<b>Review Plans for Compliance with Nutrient Management Strategy</b>			
	Conduct site plan reviews of all new development and development expansions for compliance with the stormwater treatment and nutrient reduction requirements in 15A NCAC 02B .0711, including reviews of nutrient calculations using the SNAP Tool	1. Develop and implement a flow chart or checklist that indicates which party is responsible for each step of the post-construction review and approval process including job titles and contact information	1. Annually, for Permit Years 1-5	1. Completed? (Yes/No/Status)

**Table 20: Post Construction Site Runoff Control BMPs**

		2. Conduct site plan reviews	2. Continuously	2. Completed? (Yes/No/Status)
37.	<b>SCM Operations and Maintenance Plans and Agreements</b>			
	Ensure each SCM has an Operation and Maintenance (O&M) Plan that complies with 15A NCAC 02H .1050(13) and an Operation and Maintenance Agreement that complies with 15A NCAC 02H .1050(12). Ensure the party responsible for maintenance is recorded	1. Review SCM O&M Plan and Agreements during site plan reviews	1 Continuously	1. Completed? (Yes/No/Status)
		2. Verify SCM O&M Plan and Agreements are recorded prior to permit approval and issuance of certificate of occupancy as part of the project close-out process. If the project is platted prior to as-built acceptance, require a performance security	2. Continuously	2. Number of SCM O&M Plan and Agreements recorded and number of SCM performance securities required
38.	<b>Require Recordation of BUA Limits on Deeds or Plats</b>			
	Ensure that for lots in developments with a Common Plan of Development that a BUA limit, based on the approved stormwater plan, is recorded with either the deed or plat	1. Review site plans to ensure BUA limits are noted on construction drawings	1. Continuously	1. Completed? (Yes/No/Status)
		2. Verify BUA limits are recorded prior to permit approval and issuance of certificate of occupancy as part of the project close-out process. If the project is platted prior to as-built acceptance, require a performance security	2. Continuously	2. Number of deed or plats with recorded BUA limits and number of SCM performance securities required
39.	<b>Plan Review Staff Training on Nutrient Calculator Tool</b>			

**Table 20: Post Construction Site Runoff Control BMPs**

	Ensure all plan review staff have gone through DWR-provided plan reviewer training for the approved nutrient calculator	1. All current plan review staff participate in live online training for calculator tool 2. Plan review staff who were unable to attend live online workshop view recording of training	1. Permit Year 1 2. As needed	1. Number of review staff that attended live online training 2. Number of review staff that viewed recording of training that year
40.	<b>SCM Transfer Process</b>			
	Prepare a "handoff" educational process for when developers transfer ownership of SCMs to homeowners or property owners' associations (HOAs/POAs). Educational materials should include estimates of annual costs for O&M and inspection, Town general expectations, possible/likely modes of failure, HOA/POA general obligations, other guidance and resources. Integrate this process with the as-built inspection of SCM	1. Verify establishment of HOA/POA during the as-built process before final plat is recorded	1. Continuously	1. Number of HOAs/POAs established
		2. When new HOAs/POAs are established, identify contact information and add to inventory of SCMs	2. Continuously	2. Completed? (Yes/No/Status)
		3. Develop or identify educational materials	3. Permit Year 1	3. Completed? (Yes/No/Status)
		4. Distribute educational materials to HOA/POA contacts during as-built process	4. Continuously	4. Number of educational materials distributed
		5. Send reminders of inspection requirements to HOAs/POAs	5. Annually, for Permit Years 2-5	5. Completed? (Yes/No/Status)
<b>Permit Ref.</b>	<b>3.6.4: Inspections and Enforcement</b> 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.			
	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>



**Table 20: Post Construction Site Runoff Control BMPs**

BMP No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
41.	<b>Town and County Inspections of Post-Construction SCMs</b>			
	Develop procedures for SCM inspections and an inventory. Wake County will and perform as-built inspections prior to issuance of certificate of occupancy. After SCMs are certified, the Town will perform inspections of Town-owned SCMs annually, and non-Town-owned SCMs at least once every permit term	1. Develop SCM inspection procedures and criteria to identify chronic violators with input from Wake County	1. Permit Year 1	1. Completed? (Yes/No/Status)
		2. Train code enforcement staff for SCM inspections and maintenance	2. Continuously	2. Number trained
		3. Develop an inventory of existing constructed SCMs including SCM type and owner contact information	3. Permit Year 1	3. Number of SCMs identified, provide inventory of SCMs with owner contact information
		4. Perform as-built inspections of SCMs prior to issuance of a certificate of occupancy and add to the inventory	4. Continuously	4. Number of SCM O&M Plan and Agreements recorded and number of SCM performance securities required
		5. Verify SCM As-Built has been submitted prior to permit approval and issuance of certificate of occupancy as part of the project close-out process. If the project is platted prior to as-built acceptance, require a performance security	5. Continuously	5. Number of SCM as-builts accepted and number of SCM performance securities required
		6. Inspect Town-owned SCMs annually	6 Continuously	6. Number of SCMs inspected

**Table 20: Post Construction Site Runoff Control BMPs**

		7. Inspect approximately 20% of non-Town-owned SCMs every year. Ensure all non-Town-owned SCMs are inspected at least once per permit term and chronic violators are inspected annually. Add the inspection date to the SCM inventory	7. Annually, for Permit Years 1-5	7. Number of SCMs inspected
		8. Track number and type of enforcement actions taken during SCM inspections. Document results and follow-ups, identify any chronic violators and schedule more frequent inspections for chronic violators	8. Continuously	8. Number of enforcement actions issued, and any chronic violators identified
42.	Annual Post-Construction SCM Inspections			
	Require SCM owners to perform annual inspections and submit documentation to the Town. Require inspections by a qualified professional and require SCM owners to maintain records for at least 5 years	1. Develop or identify an educational document to remind SCM owners of annual inspection and maintenance requirements	1. Permit Year 1	1. Completed? (Yes/No/Status)
		2. Determine method for distributing educational documents and distribute	2. Annually, for Permit Years 1-5	2. Method for distribution and number of documents distributed
		3. Add inspection dates to the SCM inventory when annual reports are received	3. Continuously	3. Number of inspection reports received

**Table 20: Post Construction Site Runoff Control BMPs**

		3. Review inspection reports to ensure maintenance activities are performed. Document results and follow-ups	4. Continuously	4. Number of inspection reports reviewed
		5. Track number and type of enforcement actions taken. Document results and follow-ups, identify any chronic violators and schedule more frequent inspections for chronic violators	5. Continuously	5. Number of enforcement actions issued, and any chronic violators identified
43.	<b>Town Inspections of Low-Density or BUA-Limited Projects</b>			
	Develop procedures for low-density/BUA inspections and an inventory. Perform inspections of low-density/BUA-limited projects at least once every permit term	1. Develop low-density/BUA inspection procedures and criteria to identify chronic violators with input from Wake County	1. Permit Year 1	1. Completed? (Yes/No/Status)
		2. Train code enforcement staff for inspections	2. Permit Year 1	2. Date of training and number of employees
		3. Develop an inventory of existing low-density/BUA limited projects and include owner contact information	3. Permit Year 1	3. Number of low-density/BUA limited projects identified, provide inventory with owner contact information

**Table 20: Post Construction Site Runoff Control BMPs**

		4. Inspect approximately 20% of low-density/BUA limited projects every year. Ensure all low-density projects are inspected at least once per permit term. Add the inspection date to the inventory	4. Annually, for Permit Years 1-5	4. Number of low-density/BUA limited projects inspected
<b>Permit Ref.</b>	<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.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
44.	<b>Ordinance for Fecal Coliform Reduction</b>			
	Adopt an appropriate ordinance with a pet waste management component	1. Review current ordinance for pet waste management	1. Permit Year 1	1. Completed? (Yes/No/Status) and results
		2. Draft an ordinance for Town Board review, if required	2. Permit Year 1, if required	2. Completed? (Yes/No/Status), if required
		3. Review of draft ordinance by Town Board	3. Permit Year 1, if required	3. Completed? (Yes/No/Status), if required
		4. Adopt ordinance, if required and post to web site	4. Permit Year 1, if required	4. Report date adopted, and date added to web site, if required
45.	<b>Wake County On-Site Wastewater Treatment</b>			
	Coordinate with Wake County to ensure on-site domestic wastewater facilities are operated and maintained properly	1. Determine Wake County's rules for OSDWT	1. Permit Year 1	1. Completed? (Yes/No/Status)
		2. Determine the number of OSDWT sites in Wendell	2. Permit Year 2	2. Report the number of sites identified

**Table 20: Post Construction Site Runoff Control BMPs**

		3. Identify or develop educational materials for OSDWT with Wake County to educate owners of OSDWT system on recommended operation and maintenance and distribute	3. Permit Year 3	3. Report the number of materials distributed and the means of communication
--	--	---	------------------	--

## PART 10: POLLUTION PREVENTION AND GOOD HOUSEKEEPING PROGRAMS

This SWMP-NMS provides a comprehensive pollution prevention and good housekeeping strategy for the Town of Wendell municipal facilities and operations. Pollution prevention and good housekeeping is accomplished through the implementation of seven required programs, which collectively address the 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 Wendell will manage, implement, and report the pollution prevention and good housekeeping BMPs as specified in Table below for each required program.

Table 21: Pollution Prevention and Good Housekeeping BMPs				
Permit Ref.	<b>3.7.1: Municipal Facilities Operation and Maintenance Program</b> 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
46.	<b>Develop Written Program</b>			
	Develop a written program for municipal facility operations and maintenance that addresses potential sources of pollution from municipal operations	1. Inventory municipal facilities to identify potential pollutants and polluting activities and determine if any require an Industrial NPDES permit	1. Permit Year 1	1. Completed? (Yes/No/Status)

**Table 21: Pollution Prevention and Good Housekeeping BMPs**

		2. Establish written inspection frequencies, schedules, and standardize documentation for use in Accela	2. Permit Year 1	2. Completed? (Yes/No/Status)
		3. Establish written routine maintenance procedures	3. Permit Year 1	3. Completed? (Yes/No/Status)
	<b>Facility Inspections</b>			
47.	Perform regular facility inspections to ensure municipal operations are not contributing to stormwater pollution	1. Inspect facilities according to the program developed in BMP Error! Reference source not found. and notify the facility manager of any corrective actions required	1. Begin inspections annually	1. Number of inspections performed and results
	<b>Staff Pollution Prevention and Good Housekeeping/Spill Response Training</b>			
48.	Train all town staff who may encounter stormwater on general stormwater awareness, methods to prevent pollution from municipal activities from entering the storm sewer system, and spill response	1. Train appropriate staff	1. Permit Year 2	1. Number of staff trained
		2. Train new staff when hired	2. Annually, for Permit Years 3-5	2. Number of staff trained
<b>Permit Ref.</b>	<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.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
	<b>Written Spill Response Program</b>			
49.	Maintain a Spill Response plan for each Town Facility and continue training	1. Maintain a spill response plan	1. Continuously	1. Completed? (Yes/No/Status)
		2. Annually inspect spill kits for refills and refresh spill kits when used	2. Annually, for Permit Years 1-5 and as needed	2. Number of spill kits inspected



**Table 21: Pollution Prevention and Good Housekeeping BMPs**

<b>Staff Pollution Prevention and Good Housekeeping/Spill Response Training</b>				
50.	Train all town staff who may encounter stormwater on general stormwater awareness, methods to prevent pollution from municipal activities from entering the storm sewer system, and spill response	1. Develop educational and training documents to train staff	1. Permit Year 1	1. Completed? (Yes/No/Status)
<b>Permit Ref.</b>	<b>3.7.3: MS4 Operation and Maintenance Program</b> 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.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
<b>MS4 Inspections</b>				
51.	Utilize the Town-owned camera to begin to document condition of the storm system during routine maintenance	1. Document conditions of conveyances and structures as evaluated during routine maintenance	1. Continuously for Permit Years 1-5	1. Number of conveyances and structures evaluated
<b>Permit Ref.</b>	<b>3.7.4: Municipal SCM Operation and Maintenance Program</b> 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.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
<b>Town-Owned SCM Inspections</b>				
52.	Develop an inventory of Town-owned SCMs to establish an inspection program	1. Identify all Town-owned and/or operated SCMs	1. Permit Year 1	1. Number of SCMs identified

**Table 21: Pollution Prevention and Good Housekeeping BMPs**

		2. Create a written program for municipal SCM inspections, maintenance, including frequencies, schedules, and documentation in Accela	2. Permit year 1	2. Completed? (Yes/No/Status)
		3. Inspect Town-owned SCMs annually	3. Annually, for Permit Years 1-5	3. Number of SCMs inspected
53.	<b>SCM Inspections and Maintenance Training</b>			
	Train Public Works Staff to inspect and maintain SCMs.	1. Train code enforcement staff for SCM inspections and maintenance	1. Permit Year 1	1. Number of staff trained
		2. Train additional crew members as needed	2. As needed	2. Number of staff trained
<b>Permit Ref.</b>	<b>3.7.5: Pesticide, Herbicide and Fertilizer Management Program</b> 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.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
54.	<b>Pesticide, Herbicide and Fertilizer Applicator Training</b>			
	Ensure appropriate staff in Public Works and Parks Department are trained and/or licensed as applicators	1. Train appropriate staff	1. Permit Year 2	1. Number of staff trained

**Table 21: Pollution Prevention and Good Housekeeping BMPs**

		2. Compile a list of all licensed applicators and update annually in conjunction with self-assessment	2. Annually, for Permit Years 1-5	2. Number of licensed applicators
<b>Permit Ref.</b>	<b>3.7.6: Vehicle and Equipment Maintenance Program</b> Measures to prevent and minimize contamination of stormwater runoff from areas used for municipal vehicles 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.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
55.	<b>Industrial NPDES Permitting</b>			
	Ensure that NPDES industrial permit compliance occurs at all applicable municipally owned sites	1. Review municipal facilities inventory to determine which facilities require a NPDES permit	1. Permit Year 1	1. Number of facilities that require a NPDES Industrial Permit
		2. Apply for new permits if required	2. Permit Year 2, following review of facilities	2. Number of new permits received
56.	<b>Vehicle and Equipment Cleaning and Maintenance Facility Inspection</b>			
	Perform routine inspections as part of general facility inspections to ensure that vehicle and equipment maintenance facilities minimize water quality impacts	1. Perform inspections and notify facility manager of any corrective actions required	1. Annually	1. Number of inspections
<b>Permit Ref.</b>	<b>3.7.7: Pavement Management Program</b> 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.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>

**Table 21: Pollution Prevention and Good Housekeeping BMPs**

57.	<b>Street Sweeping</b>			
	Perform street sweeping and leaf pickups following a regular schedule to reduce pollutants from Town-owned and maintained streets	1. Sweep all streets at least quarterly and document in Accela	1. Quarterly for Permit Years 1-5	1. Number of street miles swept annually
		2. Complete annual leaf pickup and document in Accela	2. Annually, for Permit Years 1-5	2. Tons or truckloads of leaves collected
58.	<b>Vehicle Spill Cleanup</b>			
	Develop vehicle spill response procedures to prevent pollutants from vehicular accidents from entering the storm drain system and educate the public	1. Maintain spill response procedures	1. Annually, for Permit Years 1-5	1. Completed? (Yes/No/Status)
		2. Provide public education about stopping vehicle leaks	2. Annually, for Permit Years 1-5	2. Completed? (Yes/No/Status)