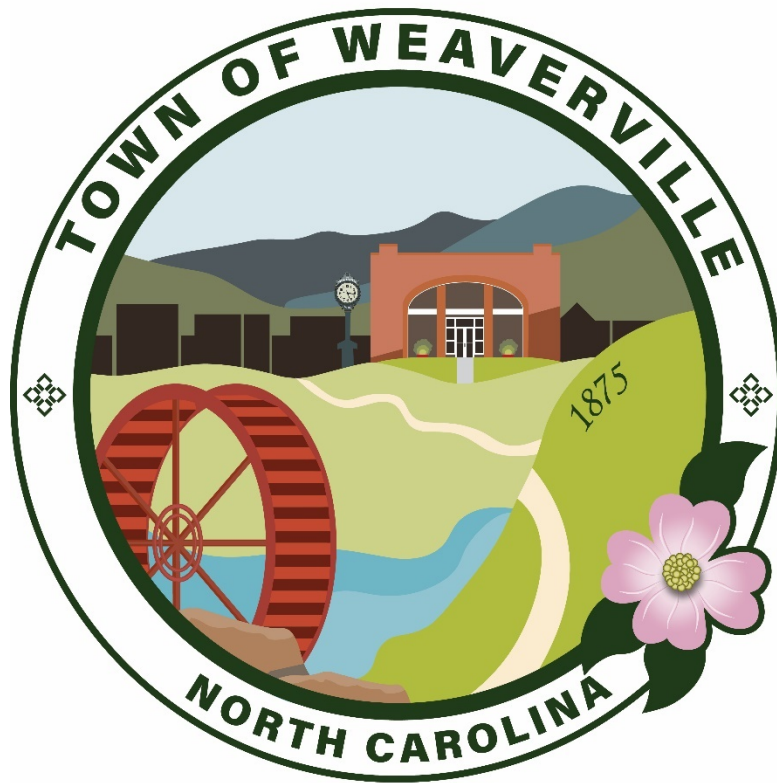


# Stormwater Management Plan

**Town of Weaverville**  
**NPDES MS4 Permit No. NCS000448**

**August 1, 2023**



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## **PART 1: INTRODUCTION**

The purpose of this Stormwater Management Plan (SWMP) is to establish and define the means by which the Town of Weaverville 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 Weaverville 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 NCS000448 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 Weaverville and located within the corporate limits of the Town of Weaverville.

In preparing this SWMP, the Town of Weaverville 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.

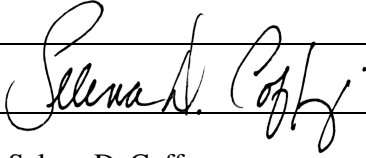
**PART 2: CERTIFICATION**

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.

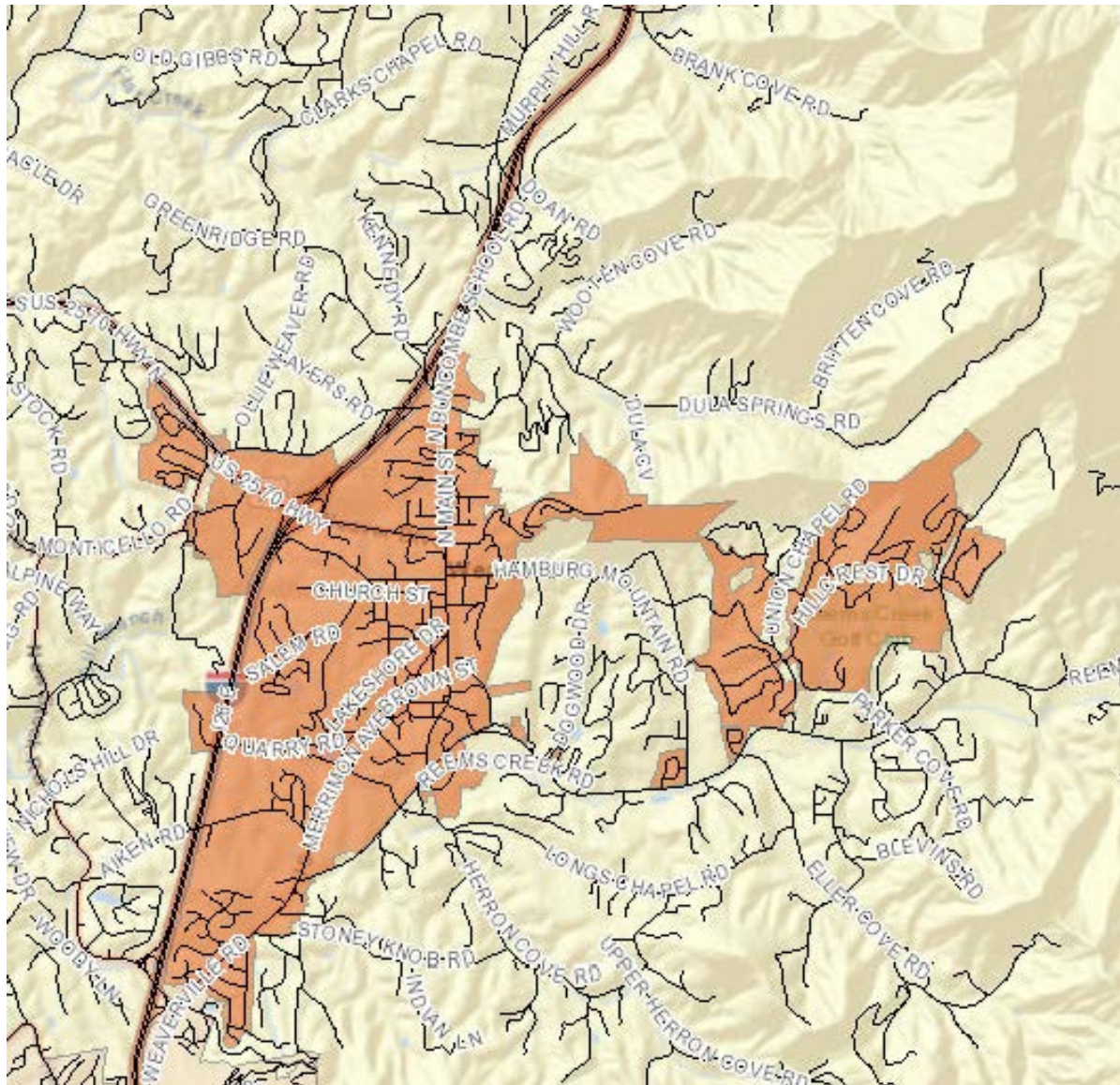
<i>Signature:</i>	
<i>Print Name:</i>	Selena D. Coffey
<i>Title:</i>	Town Manager
Signed this 1st day of August, 2023.	

## PART 3: MS4 INFORMATION

### 3.1 Permitted MS4 Area

This SWMP applies throughout the corporate limits of the Town of Weaverville, including all regulated activities associated with the discharge of stormwater from the MS4. The map below shows the corporate limits of Town of Weaverville as of January 1, 2023. The Town of Weaverville has no authority to exercise an extraterritorial jurisdiction.

Town of Weaverville - Municipal Limits (as of 1/1/2023)



### 3.2 MS4 Mapping

The Town of Weaverville is in the process of mapping its MS4 system and anticipates that the mapping will be completed prior to within permit year 1 as set out in BMP No. 21.

As it develops its MS4 map, the Town will include all pipes, flow direction, inverts, ditches, inlets, catch basins, manholes, major outfalls, sizes, condition, etc., in order to conform with permit item 3.4.1 for specific requirements. It is understood that 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.

Table 1: Summary of Current MS4 Mapping

Percent of MS4 Area Mapped	0	%
No. of Major Outfalls* Mapped	0	total

### 3.3 Receiving Waters

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

- o [Waterbody Classification Map](#)
- o [Impaired Waters and TMDL Map](#)
- o 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
Reems Creek	6-87-(10)	C	N/A
Gill Branch	6-87-12	C	N/A
Lake Louise	6-87-11	C	N/A
Reynolds Branch - Tributary to the headwaters of Reems Creek		C	N/A
Pickens Branch - Tributary from Kyfields Lake to Lake Louise		C	N/A
Lyda Branch - Tributary to the headwaters of Lake Louise		C	N/A

C – Class C (fishable/swimmable waters)

### 3.4 MS4 Interconnection

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

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

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

As a part of the MS4 mapping, the nature of the interconnection will be evaluated and documented.

### 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)
Statewide	Mercury	N	N

The Statewide TMDL for mercury does not require any actions by the NPDES stormwater permittees because most mercury in stormwater comes from atmospheric deposition.



### 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 [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](#). 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: Summary of 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>Glyptemys muhlenbergii</i>	Bog turtle	Vertebrate	T(S/A)
<i>Cryptobranchus alleganiensis</i>	Hellbender	Vertebrate	ARS
<i>Desmognathus wrighti</i>	Pygmy salamander	Vertebrate	FSC
<i>Sorex palustris punctulatus</i>	Southern water shrew	Vertebrate	FSC
<i>Alasmidonta raveneliana</i>	Appalachian elktoe	Invertebrate	E
<i>Cambarus reburus</i>	French Broad crayfish	Invertebrate	FSC
<i>Hexastylis rhombiformis</i>	French Broad heartleaf	Vascular plant	FSC
<i>Hexastylis naniflora</i>	Dwarf flowered heartleaf	Vascular plant	T
<i>Lilium grayi</i>	Gray's lily	Vascular plant	FCS
<i>Sarracenia rubra</i> ssp. <i>Jonesii</i>	Mountain sweet pitcherplant	Vascular plant	E
<i>Sarracenia oreophila</i>	Green pitcherplant	Vascular plant	E
<i>Plagiochila sharpii</i>	Liverwort	Nonvascular plant	ARS
<i>Plagiochila virginica</i> var. <i>caroliniana</i>	Liverwort	Nonvascular plant	FSC

BGPA = Bald and Golden Eagle Protection Act

T(S/A) = Threatened due to similiary of appearance

ARS = At risk species

FSC = Federal Species of Concern

E = Endangered

### 3.7 Industrial Facility Discharges

The Town of Weaverville's MS4 jurisdictional area includes the following industrial facilities which hold NPDES Industrial Stormwater Permits, as determined from the NCDEQ [Active NPDES Stormwater Permit List](#) and/or [Active Stormwater Permits Map](#).

Table 5: NPDES Stormwater Permitted Industrial Facilities

Permit Number	Facility Name
NCG030070	ABB Motors and Mechanical
NCGNE0333	Shorewood Packaging Corporation

### 3.8 Non-Stormwater Discharges

The water quality impacts of non-stormwater discharges have been evaluated by the Town of Weaverville as summarized in Table 6 below. The unpermitted non-stormwater flows listed as incidental do not significantly impact water quality. The Town of Weaverville has evaluated residential and charity car washing and street washing for possible significant water quality impacts. The Town does not perform street washing so street washing discharges are not relevant to the MS4.

The Division has not required that other non-stormwater flows be specifically controlled by the Town of Weaverville.

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 Weaverville to determine whether they may significantly impact water quality. They were determined to be a possible cause of water quality impacts and will be addressed through public education efforts.

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	N/A
Flows from firefighting activities	Incidental

### 3.9 Target Pollutants and Sources

In addition to those target pollutants identified above, the Town of Weaverville 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 programs that address the target pollutants. In addition, the Town of Weaverville has evaluated schools, homeowners and businesses as target audiences that are likely to have significant stormwater impacts. The schools were selected as a target audience due to the opportunity to affect positive change through education and involvement opportunities. Homeowners and businesses were identified as target audiences because they were likely sources of non-point pollution through uninformed management practices.

Table 7: Summary of Target Pollutants and Sources

Target Pollutants	Likely Sources/Target Audiences	SWMP Program Addressing Target Pollutants/Audiences
Litter	Residential, commercial, schools	Public Education & Outreach, Public Involvement & Participation
Yard Waste (leaves and grass clippings)	Residential, commercial	Public Education & Outreach, Public Involvement & Participation
Sediment	Construction	Construction Site Runoff Control
Nutrients	Sewer overflows, failing septic systems, urbanization, schools	Public Education & Outreach, Illicit Discharge Detection & Elimination, Construction Site Runoff Control, Post-Construction Site Runoff Control, Pollution Prevention & Good Housekeeping
Fecal coliform	Sewer overflows, failing septic systems, wildlife, illicit discharges	Public Education & Outreach, Illicit Discharge Detection & Elimination
Mercury/statewide TMDL	Atmospheric deposition	Public Education & Outreach (fish consumption advisory)
Illicit Discharges	Residential, commercial, industrial, Town staff	Public Education & Outreach, Illicit Discharge Detection & Elimination
Illegal Dumping	Residential, commercial, industrial, Town staff	Public Education & Outreach, Pollution Prevention & Good Housekeeping
Improper Disposal of Waste	Residential, commercial, industrial, Town staff	Public Education & Outreach, Public Involvement & Participation, Pollution Prevention & Good Housekeeping
General Non-Point Source Pollution	Residential, commercial, schools, Town staff	Public Education & Outreach

## PART 4: STORMWATER MANAGEMENT PROGRAM ADMINISTRATION

### 4.1 Organizational Structure

The Town's stormwater program is implemented in partnership between the Planning Department and the Public Works Department. The Planning Department is responsible for the public outreach and involvement components and serves as the liaison to Buncombe County which shares responsibility for administration and implementation of the Construction Site Runoff Control and Post-Construction Site Runoff Control. The Public Works Department is responsible for good housekeeping and municipal pollution prevention activities, stormwater sewer system maintenance, and IDDE. The Public Works Director is designated as the Stormwater Program Administrator.

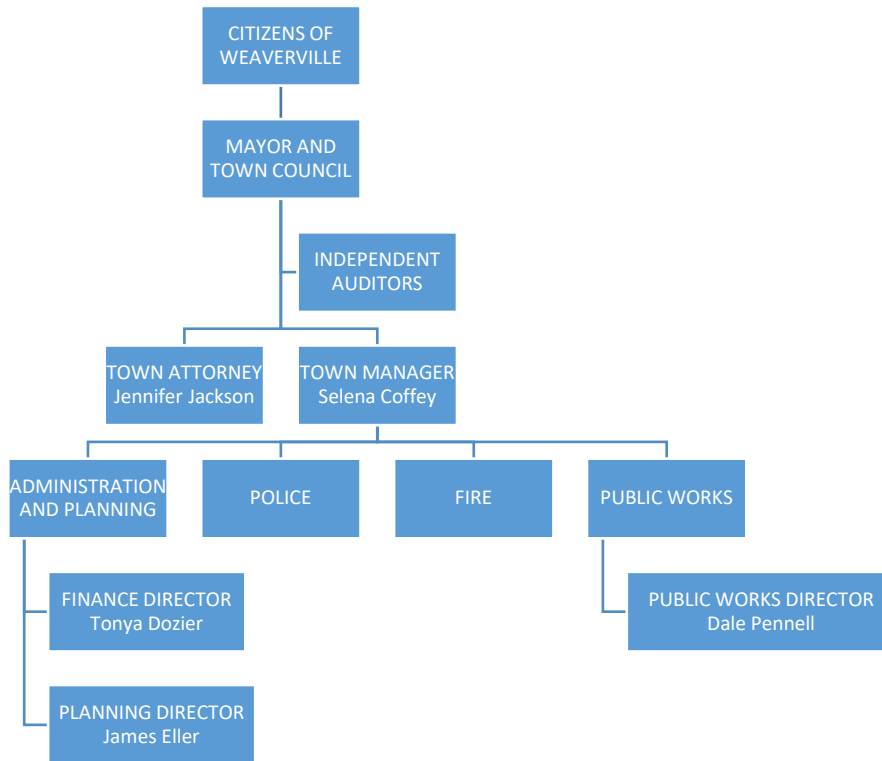


Table 8: Summary of Responsible Parties

<b>SWMP Component</b>	<b>Responsible Position</b>	<b>Staff Name</b>	<b>Department</b>
<b>Stormwater Program Administration</b>	Public Works Director	Dale Pennell	Public Works
<b>SWMP Management</b>	Town Attorney	Jennifer Jackson	Administration/Legal
<b>Public Education &amp; Outreach</b>	Planning Director	James Eller	Planning
<b>Public Involvement &amp; Participation</b>	Planning Director	James Eller	Planning
<b>Illicit Discharge Detection &amp; Elimination</b>	Public Works Director	Dale Pennell	Public Works
<b>Construction Site Runoff Control</b>	Planning Director	James Eller	Planning
<b>Post-Construction Stormwater Management</b>	Planning Director	James Eller	Planning
<b>Pollution Prevention/Good Housekeeping for Municipal Operations</b>	Public Works Director	Dale Pennell	Public Works
<b>Municipal Facilities Operation &amp; Maintenance Program</b>	Public Works Director	Dale Pennell	Public Works
<b>Spill Response Program</b>	Public Works Director	Dale Pennell	Public Works
<b>MS4 Operation &amp; Maintenance Program</b>	Public Works Director	Dale Pennell	Public Works
<b>Municipal SCM Operation &amp; Maintenance Program</b>	Public Works Director	Dale Pennell	Public Works
<b>Pesticide, Herbicide &amp; Fertilizer Management Program</b>	Public Works Director	Dale Pennell	Public Works
<b>Vehicle &amp; Equipment Cleaning Program</b>	Public Works Director	Dale Pennell	Public Works
<b>Pavement Management Program</b>	Public Works Director	Dale Pennell	Public Works
<b>TMDL Requirements</b>	N/A	N/A	N/A

#### 4.2 Program Funding and Budget

In accordance with the issued permit, the Town of Weaverville 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 activities of the Town are currently included within the general budgets of both the Public Works Department and Administration and have not been tracked.

The Town recognizes that its stormwater program is currently underfunded to conduct all of the proactive elements of the permit. As the Town of Weaverville fully develops and implements its stormwater program, further fiscal analysis and investigation of funding options (such as additional general fund allocation or a stormwater fee) will be conducted as indicated in BMP No. 1 in order to fully fund the program by permit year 5.

### 4.3 Shared Responsibility

The Town of Weaverville 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 Weaverville 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 Weaverville 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)
Permit Section 3.5.1 through 3.5.4	Buncombe County – Buncombe County Sedimentation and Erosion Control Program	Y
Permit Section 3.6.1 through 3.6.5	Buncombe County – Buncombe County Stormwater Management Program	Y
Permit Section 3.2	Land of Sky Regional Council – Regional Stormwater Services Program	Y
Permit Section 3.3	Land of Sky Regional Council – Regional Stormwater Services Program	Y

The Town of Weaverville has entered into an intergovernmental agreement with Buncombe County to perform both the Construction Site Runoff and Post-Construction Site Runoff Controls. Such agreement addresses the shared responsibilities for the Construction Site Runoff and Post-Construction Site Runoff Controls components. Any noted program deficiencies will be addressed cooperatively in order to maximize compliance.

Land of Sky Regional Council (LOSRC), the North Carolina Council of Government representing the Town of Weaverville and other surrounding jurisdictions, has recently announced its Regional Stormwater Services Program. The Town of Weaverville contracts annually with LOSRC to participate in this program and for the shared responsibilities indicated above and in the BMPs as indicated in this plan, with the most recent contract effective as of July 1, 2022.

#### 4.4 Co-Permittees

There are no other entities applying for co-permittee status under the NPDES MS4 permit number NCS000448 for the Town of Weaverville. 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 Weaverville 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.	<b>Adequate Funding</b>			
	Perform a fiscal analysis and explore options to obtain adequate program funding to fully fund the stormwater program and meet all requirements of the permit. Select and implement a funding strategy for the Phase II Stormwater Program	1. Complete a fiscal gap analysis	1. Permit year 1	1. Yes/no
		2. Determine available funding mechanisms and evaluate options	2. Permit year 1	2. Yes/no
		3. Select a funding mechanism	3. Permit years 1-2	3. Yes/no
4. Implement funding mechanism		4. Permit year 2-5	4. Yes/no	
2.	<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.

**Table 11: Program Administration BMPs**

BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
<b>Permit Ref.</b>	<b>2.2.2: Written Procedures</b> The Permittee shall maintain, and make available to the Division upon request, written procedures for implementing the six minimum control measures. Written procedures shall identify specific action steps, schedules, resources, and responsibilities for implementing the MCMs. Written procedures can be free standing or, where appropriate, integrated into the Stormwater Management Plan. The illicit discharge detection and elimination plan shall be free standing.			
<b>3.</b>	<b>Written Procedures</b>			
	Develop an implementation plan for the six MCMs including action steps, responsibilities, schedules and resources.	1.Prepare written procedures for implementation of plan	1.Permit year 1	1.Yes/no
		2.Review written procedures and update as needed	2. Permit years 2-5	2. Yes/no
<b>4.</b>	<b>Evaluate SWMP and Control Measures to Address Discharges</b>			
	If discharges are determined to cause or contribute to non-attainment of an applicable water quality standards, the Town will review its SWMP to determine which control measures need to be expanded or revised to address the discharges	1. Review DEQ water quality assessment for Reems Creek	1. Bi-Annually, when Integrated Report published (2024, 2026)	1. Yes/no
<b>5.</b>	<b>Availability of NPDES Permit and SWMP for Review</b>			
	Maintain an up-to-date version of the Town’s permit and SWMP on the Town’s website	1.Post the Town’s NPDES Permit and SWMP to the Stormwater web page of the Town’s website	1.Permit year 1	1.Yes/no
<b>6.</b>	<b>Modify Stormwater Program as Required by DEMLR</b>			
	Modify the program as required by DEMLR	1.Revise SWMP as required	1. As required	1. Date required revisions implement
		2.Notify DEMLR of revisions to SWMP	2. As required	2. Date DEMLR notified
<b>7.</b>	<b>Legal Agreements for Shared Responsibility</b>			
	Maintain legal agreements with Buncombe County and Land of Sky Regional Council (LOSRC) for proper delegation and shared responsibilities as indicated in Section 4.3 of this SWMP and monitor for compliance.	1.Maintain a legal agreement with Buncombe County and LOSRC	1.Permit year 1	1. Yes/no
		2.Review legal agreements to confirm that they meet all requirements outlined in the Permit	2.Permit year 1, and as needed	2. Yes/no



**Table 11: Program Administration BMPs**

		3. Monitor Buncombe County and LOSRC to ensure responsibilities are being carried out and compliant	3. Annually with SWMP self-assessment	3. Yes/no
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**Table 11: Program Administration BMPs**

Permit Ref.	<b>1.6: Permit Renewal Application</b> Measures to submit a permit renewal application no later than 180 days prior to the expiration date of the NPDES MS4 permit.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
8.	<b>Permit Renewal Application</b>			
	Submit a permit renewal application and Draft SWMP no later than 180 days 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 Weaverville 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 Weaverville 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, Town staff
Sedimentation	Construction
Nutrients	Residential, commercial, schools
Fecal coliform	Residential, commercial, schools
Mercury/statewide TMDL	Residential, commercial
Illicit Discharges	Residential, commercial, industrial, Town staff
Illegal Dumping	Residential, commercial, industrial, Town staff
Improper Disposal of Waste	Residential, commercial, industrial, Town staff
General non-point source pollution	Residential, commercial, schools, Town staff

The Town of Weaverville will use its eFocus newsletter, Citizens Academy, and other Town events as a platform for stormwater outreach and education. The Town will develop a stormwater web page and use social media to reach the community and place signage on Town owned SCMs to reach stakeholders at those sites. Additionally, the Town of Weaverville has partnered with Land of Sky Regional Council (LOSRC) and participates in its WNC Stormwater Partnership Program to more efficiently implement education and outreach activities. The Town of Weaverville will manage, implement and report the following public education and outreach BMPs.

Table 13: Public Education and Outreach BMPs

BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
Permit Ref.	<p><b>3.2.2 and 3.2.4: Outreach to Targeted Audiences</b>                      Measures to identify the specific elements and implementation of a Public Education and Outreach Program to share educational materials to the community or conduct equivalent outreach activities about the impacts of stormwater discharges on water bodies and how the public can reduce pollutants in stormwater runoff. The permittee shall provide educational information to identified target audiences on pollutants/sources identified in table 12 above, and shall document the extent of exposure of each media, event or activity, including those elements implemented locally or through a cooperative agreement.</p>			

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

9.	<b>Partnership with LOSRC</b>			
	The Town will engage with LOSRC to develop education and outreach initiatives that will be administered by LOSRC. Initiatives will focus on residential, commercial, and school audiences within the MS4 area.	1. Maintain a legal agreement with LOSRC	2. Permit year 1	2. Report date established
2. Review and modify; Monitor LOSRC to ensure responsibilities are being carried out		3. Annually with SWMP self-assessment	3. Yes/no	
10.	<b>Town Sponsored Event</b>			
	The Town will distribute information on stormwater during at least one Town sponsored event each year (such as but not limited to Earth Day, Arbor Day, Second Saturday Summer Music Series, Fourth of July). LOSRC may be contributing materials and promoting events.	1. Develop or identify one or more informational handouts for distribution at events during permit term that covers litter, nutrients, and non-point source pollution (including car washing), etc.	1. Annually, beginning Permit year 2	1. Is handout developed or identified? Yes/no
2. Man a booth at one or more events		2. Permit year 2 and annually thereafter	2. Date of event(s); number of handouts distributed	
11.	<b>Weaverville Citizens' Academy</b>			
	Information on the Town's stormwater program will be shared during its Citizens' Academy, a program that tours all Town departments and is held annually. LOSRC may be contributing materials for this event.	1. Develop stormwater program material to be included during the Citizens' Academy	1. Permit year 3	1. Yes/no
		2. Train Town staff to present stormwater information during Citizens' Academy	2. Permit year 3	2. Number of staff members trained
3. Present on stormwater program during Citizens' Academy		3. Permit year 3, and annually thereafter	3. Number of participants	
12.	<b>Social Media Campaign</b>			
	The Town's existing social media accounts will be used to reach the residential target audience and share information related to stormwater issues. LOSRC may be contributing materials and information. Social media post will include the following topics: keeping yard waste and litter out of storm drains, reducing fertilizer runoff, car washing, illicit discharge/illegal litter, pet waste, vehicle leaks, etc.	1. Post 3 or more social media posts annually	1. Permit year 1 and annually thereafter	1. Number of posts
13.	<b>Add Signage to Town-owned SCMs</b>			

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

	Educational signage will be added to Town-owned SCMs that are accessible by the public	1. Locate Town-owned SCMs that are available to the public	1. Permit year 1	1. Yes/No
		2. Develop educational signage that describes the use and function of SCMs, notes the stormwater hotline and website	2. Permit year 2	2. Report the number of signs developed
		3. Add signage to accessible SCMs	3. Permit year 3	3. Report the number of signs installed
<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 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 links to Buncombe County resources that provide all relevant post-construction requirements, design standards, checklists and/or other materials.			
<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>14.</b>	<b>Stormwater Page on Town Website</b>			
	The web page will provide information on the Town’s stormwater program, including the permit, SWMP, applicable ordinances, and annual reports. The web page will also include a stormwater issue reporting mechanism, educational materials developed by the Town, and links to additional educational resources. The web page will also serve to advertise the stormwater hotline and compliance email and opportunities for involvement.	1. Maintain the web page, including updating any broken links, upload new educational materials, upload most recent SWMP and annual reports	1. Annually	1. Report the date the web page is reviewed and updated
<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>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>15.</b>	<b>Stormwater Hotline and Compliance Email</b>			
	A hotline will be maintained for citizens to ask stormwater questions or report stormwater issues	1. Maintain a hotline phone number and responsible party	1. Permit year 1-5	1. Yes/no

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

		2.Establish and train a responsible party to answer stormwater questions and comments	2. Permit year 1, and as needed	2.Report the date of training and the dates of any additional staff trained
		3.Train responsible parties in general stormwater knowledge, appropriate contacts for stormwater questions, and citizen opportunities within the stormwater program	3. Permit year 1, and as needed	3.Report the date of training and the date any additional staff are trained
		4. Publicize hotline in materials developed for the stormwater program and posting on stormwater web page	4.Permit year 1-5	4.Yes/no
		5.Establish and utilize a tracking mechanism to document the number and type of calls received	5.Permit year 1-5	5. Report the number of calls

**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 Planning Board will function as the Town’s stormwater advisory board. A stormwater hotline and a stormwater issue reporting mechanism on the web page will be used to collect public input. The Town of Weaverville will manage, implement and report the following public involvement and participation BMPs.

<b>Table 14: Public Involvement and Participation BMPs</b>				
<b>Permit Ref.</b>	<b>3.3.1: Public Input</b> Mechanisms for public involvement that provide for input on stormwater issues and the stormwater program.			
<b>BMP No.</b>	<b>A</b> Description of BMP	<b>B</b> Measurable Goal(s)	<b>C</b> Schedule for Implementation	<b>D</b> Annual Reporting Metric
<b>16.</b>	<b>Town Council</b>			
	Town staff will bring stormwater issues before the Town Council and solicit public input on stormwater issues and the stormwater program.	1. Include an annual agenda item for Town staff to report to Town Council on stormwater concerns and receive input from the public	1. Annually, beginning with Permit year 2	1. Date of meetings
<b>17.</b>	<b>Stormwater Page on Town Website – see BMP 14</b>			
<b>18.</b>	<b>Stormwater Hotline – see BMP 15</b>			
<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> Description of BMP	<b>B</b> Measurable Goal(s)	<b>C</b> Schedule for Implementation	<b>D</b> Annual Reporting Metric
<b>19.</b>	<b>Cleanup Event</b>			
	Organize volunteers to participate in a cleanup event by picking up trash or cleaning litter from public areas with potential to pollute stormwater. LOSRC may be promoting events.	1. Identify public areas that could be cleaned by volunteers	1. Permit year 1	1. Potential areas identified? Yes/no?
		2. Coordinate cleanup of identified public areas	2. Annually, beginning in permit year 2	2. Report the number of participants and number of trash bags filled
<b>20.</b>	<b>Partnership with LOSRC</b>			
	The Town has engaged LOSRC to develop volunteer opportunities that will be administered by LOSRC. Opportunities will focus on residential, commercial, and school audiences within the MS4 area	1. Maintain a legal agreement with LOSRC	2. Permit year 1	2. Report date established
		2. Monitor LOSRC to ensure responsibilities are being carried out	2. Annually with SWMP self-assessment	2. Yes/no

**PART 7: ILLCIT DISCHARGE DETECTION AND ELIMINATION PROGRAM**

The Town of Weaverville will develop, manage, implement, document, report and enforce an Illicit Discharge Detection and Elimination (IDDE) Program which shall, at a minimum, include the following illicit discharge detection and elimination BMPs. A compliant IDDE Program will be established, within permit year 1. The complete MS4 map will include all known pipes and structures, outfalls (with major outfalls identified), flow directions, and receiving waters and is anticipated to be completed prior to or within permit year 1.

<b>Table 15: Illicit Discharge Detection and Elimination BMPs</b>				
<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>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>21.</b>	<b>Development of Complete MS4 Map</b>			
	The MS4 map will be completed through a field survey and GPS-located inventory. Map will include inlets, outfalls, pipes and sizes, flow directions, DOT interconnections and receiving waters.	1. Implement a GIS system and complete MS4 inventory and mapping	1. Permit year 1	1. Date system mapping completed
		2. Identify drainage areas qualifying as major outfalls and add to map	2. Permit year 3	2. Yes/no
<b>22.</b>	<b>Updates to MS4 Map</b>			
	The MS4 Map will be updated when new conveyances and major outfalls are located or constructed in order to maintain a complete and up-to-date MS4 map.	1. When new conveyances and outfalls are located or constructed, add them to the map	1. Annually, once mapping completed	1. Yes/no
<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>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>23.</b>	<b>Legal Authority</b>			
	Develop and implement an ordinance in order to establish legal authority to prohibit, detect, and eliminate illicit connections and discharges, illegal dumping and spills into the MS4, including enforcement procedures and actions. Update ordinances if required.	1. Develop and adopt ordinance	1. Permit year 1	1. Report date of adoption
		2. Review ordinance and update if revision is required to maintain legal authority	2. Annually, after adoption	2. Yes/no



**Table 15: Illicit Discharge Detection and Elimination BMPs**

Permit Ref.	<p><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:</p> <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	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
24.	<b>Outfall Inspections</b>			
	Perform regular dry weather (no rain in previous 72 hours) outfall inspections to proactively identify illicit discharges and illicit connections	1. Train staff to perform dry weather outfall inspections and illicit discharge investigations (see BMP No. 28)	1. Permit year 1; as needed	1. Number of employees trained
		2.Perform annual inspections of outfalls in dry weather conditions and document any potential violations using the forms and procedure developed in BMP No. 27	2. Annually, beginning in permit year 2	2.Number of outfalls inspected and number of potential illicit discharges identified
25.	<b>Illicit Discharge Identification Procedure</b>			
	Develop and maintain a standard operating procedure (SOP) for investigation of potential illicit discharges, illicit connections, and illegal dumping	1. Develop a SOP for investigating potential illicit discharges and connections	1. Permit year 1	1. Yes/no
		2.Maintain a written IDDE program	2.Continuously	2.Yes/no
26.	<b>IDDE Program Evaluation</b>			
	Annual evaluation of IDDE program to promote continuance of effective components and improvements in areas that are lacking, as well as identification of potential “hot spot” areas.	1.Hold evaluation meeting with IDDE program stakeholders, including at least Stormwater Administrator and Public Works Director	1.Annually beginning in permit year 2, in conjunction with annual self-assessment	1. Yes/no

**Table 15: Illicit Discharge Detection and Elimination BMPs**

		2.Review IDDE reports and identify any chronic violators, issues, and/or “hot spot” areas	2. Annually beginning in permit year 2, in conjunction with annual self-assessment	2. Yes/no
<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>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>27.</b>	<b>Spreadsheet Tracking System</b>			
	A tracking system for observed IDDE violations and follow-up actions will be developed and implemented in order to identify “hot spot” areas, chronic violators, and recurring issues.	1. Develop a report form to include observed illicit discharge indicators, date, location, and contacts made	1. Permit year 1	1. Yes/no
		2.Develop a tracking spreadsheet to collect data from IDDE reports as well as the results of the investigation, any follow-up, date of closure, and enforcement action taken	2. Permit year 1	2. Yes/no
<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>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>28.</b>	<b>Staff Training</b>			
	Implement a program to educate Town staff about the indicators of potential illicit discharges, illicit connections, and illegal dumping and the appropriate avenues through which to report suspected illicit discharge (see BMP No. 25 for SOPs on which to train staff). LOSRC may be providing this training.	1. Train staff with the potential to discover discharge during routine work activities	1. Permit year 1 and as needed thereafter	1. Number of attendees
		2.Train staff with IDDE responsibilities or the potential to discover discharge during routine work activities	2.Permit year 1, and as needed thereafter	2. Number of attendees
<b>29.</b>	<b>Fact Sheets</b>			

**Table 15: Illicit Discharge Detection and Elimination BMPs**

	Hang fact sheet posters in employee common areas to serve as a reminder of the basics on identifying and reporting illicit discharges, connections, and dumping	1. Identify or develop illicit discharge fact sheet poster and display in employee common areas	1. Permit year 2	1. Yes/no
<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> Description of BMP	<b>B</b> Measurable Goal(s)	<b>C</b> Schedule for Implementation	<b>D</b> Annual Reporting Metric
<b>30</b>	<b>Stormwater Page on Town Website – see BMP 14</b>			
<b>31.</b>	<b>Stormwater Hotline – see BMP 15</b>			

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

In accordance with 15A NCAC 02H.0153, the Town of Weaverville relies upon the North Carolina Sedimentation Pollution Control Act (SCPA) of 1973, as administered by Buncombe County, as a qualifying alternative program to meet a portion of 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
3.5.1 - 3.5.4	Buncombe County Delegated SPCA Program	15A NCAC Chapter 04, NCDEQ Approved Delegation, Intergovernmental Agreement	Buncombe County

An intergovernmental agreement between the Town of Weaverville and Buncombe County is in place for construction site runoff controls and provides proper documentation of shared responsibilities and a mechanism to address any program deficiencies noted in the self-audits of the Construction Site Runoff Controls. In addition, the Town of Weaverville provides opportunities for public input through the stormwater hotline and compliance email and additional waste management requirements for construction site operators are also components of the construction site runoff control program. The Town of Weaverville also implements the following BMPs to meet NPDES MS4 Permit requirements.

Table 17: Construction Site Runoff Control BMPs				
Permit Ref.	3.5.1 – 3.5.4: Legal Authority and NC Sedimentation Pollution Control Act of 1973 (SPCA) Program The Permittee may rely upon a North Carolina Sedimentation Pollution Control Act of 1973 (SPCA) program as defined in 15A NCAC Chapter 04 to meet the requirements of 3.5.1 through 3.5.4			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
32.	<b>Legal Agreement with Buncombe County</b>			
	The Town will develop and maintain a legal agreement with Buncombe County for the proper delegation of all construction site runoff control management through the administration and enforcement of a sedimentation pollution and erosion control program	1.Maintain a legal agreement with Buncombe County	1.Permit year 1	1. Yes/no
		2. Monitor Buncombe County to ensure responsibilities are being carried out	2.Annually with SWMP self-assessment	2. Yes/no
33.	<b>Buncombe County SPCA Program Compliance</b>			
	The self-audit showed full compliance; however, the Town will work with Buncombe County if areas in which County SPCA regulations	1. Communicate results of self-audit and non-compliant provisions to County	1. As needed	1. Yes/no

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

	are not in full compliance are identified and require that any necessary revisions to such regulations be adopted in a timely manner and maintained for full compliance with construction site runoff control requirements.	2. Assist County with identification of necessary revisions to the County Code	2. As needed	2. Yes/no/status
		3. Monitor County activity to adopt necessary revisions	3 As needed	3. Yes/no/status
<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>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>34.</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.	1. Train staff on proper handling of construction site runoff control complaints.	1. Permit year 1, and as needed	1. Number trained
<b>35.</b>	<b>Stormwater Hotline – see BMP 15</b>			
<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>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>36.</b>	<b>Maintain Legal Authority</b>			
	Review existing ordinance (Code of Ordinances, Chapter 22, Section 22-48) in order to determine adequacy of current regulation on required construction site operators to control waste, and update ordinance if required	1. Review existing ordinance and update if revision is required to maintain legal authority	1. Permit year 1, and annually thereafter	1. Yes/no
<b>37.</b>	<b>Contractor Education</b>			
	Communicate new waste management requirements to construction site operators	1. Identify or develop fact sheet to share with construction site operators when Town zoning permits issued	1. Permit year 1, after ordinance is adopted	1. Yes/no
		2. Add fact sheet to website	2. Permit year 1, after ordinance is adopted	2. Yes/no

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

		3. Distribute fact sheets when zoning permits issued	3. Permit year 1, after ordinance is adopted	3. Yes/no
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**PART 9: POST-CONSTRUCTION SITE RUNOFF CONTROL PROGRAM**

This SWMP identifies the minimum elements to develop, implement and enforce a program to address stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that are located within the Town of Weaverville 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.

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

State QAP Name	State Requirements	Local Ordinance / Regulatory Mechanism Reference
N/A	N/A	N/A

Buncombe County’s regulations are codified in local ordinance, and implementation is further defined in guidance, manuals and/or standard operating procedure(s) as summarized in Table 19 below.

The Town of Weaverville has entered into an agreement with Buncombe County for shared responsibility for post-construction site runoff requirements, including inspection, enforcement, and documentation of the full post construction program.

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

Table 19: Summary of Existing Post-Construction Program Elements

Permit Requirements for <b>Plan Review and Approval</b>	Municipal Ordinance/Code Reference(s) and/or Document Title(s)	Date Adopted
3.6.2(a) Authority	Buncombe County Code of Ordinances – Article VII of Chapter 26; Intergovernmental Agreement	8/6/2020
3.6.3(a) & 15A NCAC 02H.0153(c) Federal, State & Local Projects	Federal, state, and local regulations as applicable	N/A
3.6.3(b) Plan Review	Buncombe County Code §§ 26-322, 26-341; Buncombe County Stormwater Permit Plan Review Checklist and Permit Closeout Checklist; Intergovernmental Agreement	8/6/2020
3.6.3(c) O&M Agreement	Buncombe County Code § 26-342; Buncombe County Stormwater Permit Closeout Checklist; Intergovernmental Agreement	8/6/2020
3.6.3(d) O&M Plan	Buncombe County Code § 26-342; Buncombe County Stormwater Permit Closeout Checklist; Intergovernmental Agreement	8/6/2020
3.6.3(e) Deed Restrictions/Covenants	Buncombe County Code § 26-385(5); Intergovernmental Agreement	8/6/2020
3.6.3(f) Access Easements	Buncombe County Code § 26-385(7); Intergovernmental Agreement	8/6/2020
Permit Requirements for <b>Inspections and Enforcement</b>	Municipal Ordinance/Code Reference(s) and/or Document Title(s)	Date Adopted
3.6.2(b) Documentation	Buncombe County Code §§ 26-321, 26-403; Intergovernmental Agreement*	8/6/2020
3.6.2(c) Right of Entry	Buncombe County Code §§ 26-322(j)(1), 26-403(b); Intergovernmental Agreement	8/6/2020
3.6.4(a) Pre-CO Inspections	Buncombe County Code §§ 26-384, 26-402; Intergovernmental Agreement	8/6/2020
3.6.4(b) Compliance with Plans	Buncombe County Code §§ 26-381(a), 26-383; Intergovernmental Agreement	8/6/2020
3.6.4(c) Annual SCM Inspections	Buncombe County Code § 26-385(4); Intergovernmental Agreement*	8/6/2020
3.6.4(d) Low Density Inspections	Buncombe County Code §§ 26-384, 26-402; Intergovernmental Agreement	8/6/2020
3.6.4(e) Qualified Professional	Buncombe County Code §§ 26-385; Intergovernmental Agreement	8/6/2020
Permit Requirements for <b>Fecal Coliform Reduction</b>	Municipal Ordinance/Code Reference(s) and/or Document Title(s)	Date Adopted
3.6.6(a) Pet Waste	Weaverville Code Section 4-77.1	3/28/2022
3.6.6(b) On-Site Domestic Wastewater Treatment	Buncombe County Environmental Health Application, Evaluation, and Permitting Procedures for Septic Systems and Well Construction	N/A

\*Buncombe County Stormwater Ordinance currently does not specifically reference the data documentation that DEQ appears to require and provides for inspection reports of SCMs to be provided on a three-year basis. These discrepancies are noted and are in the process of being resolved.



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

Permit Ref.	<b>3.6.5(a), 3.6.5(b), and 4.1.3: Minimum Post-Construction Reporting Requirements</b>			
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 Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
<b>38.</b>	<b>Standard Reporting</b>			
	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.	<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 Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
<b>39.</b>	<b>Legal Agreement with Buncombe County</b>			
	The Town will develop and maintain a legal agreement with Buncombe County for the proper delegation of	1. Maintain a legal agreement with Buncombe County	1. Permit year 1	1. Yes/no

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

	all post-construction site runoff control management	2. Monitor Buncombe County to ensure responsibilities are being carried out	2. Annually with SWMP self-assessment	2. Yes/no
<b>40.</b>	<b>Buncombe County Stormwater Regulation Compliance</b>			
	The Town will work with Buncombe County in order to identify areas in which County stormwater regulations and practices are not in full compliance and to require that any necessary revisions to such regulations or practices be adopted in a timely manner and maintained for full compliance with post-construction site runoff control requirements.	1. Communicate results of self-audit and non-compliant provisions to County	1. Permit year 1	1. Yes/no
		2. Assist County with identification of necessary revisions to the County Code	2. Permit year 1	2. Yes/no
		3. Monitor County activity to adopt necessary revisions	3 Permit year 1 and 2.	3. Yes/no
<b>Permit Ref.</b>	<p><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).</p>			
<b>BMP No.</b>	<b>A</b> Description of BMP	<b>B</b> Measurable Goal(s)	<b>C</b> Schedule for Implementation	<b>D</b> Annual Reporting Metric
<b>41.</b>	<b>Mechanism to Require Long-term Operation and Maintenance</b>			
	The Town will work with Buncombe County on the necessary revisions to County regulations to provide that the O&M plan required by the owner of each SCM includes annual inspections of each SCM by a qualified professional and documentation of such annual inspections is to be maintained	1. Communicate results of self-audit and non-compliant provisions to County	1. Permit year 1	1. Yes/no
		2. Assist County with identification of necessary revisions to the County Code	2. Permit year 1	2. Yes/no
		3. Monitor County activity to adopt necessary revisions	3 Permit year 1 and 2.	3. Yes/no

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

BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
<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>42.</b>	<b>Inspections of Structural Stormwater Control Measures</b>			
	The Town will work with Buncombe County on the necessary revisions to County regulations to require annual inspections of each SCM by a qualified professional and documentation of such annual inspections	1. Communicate results of self-audit and non-compliant provisions to County	1. Permit year 1	1. Yes/no
		2. Assist County with identification of necessary revisions to the County Code	2. Permit year 1	2. Yes/no
		3. Monitor County activity to adopt necessary revisions	3. Permit year 1 and 2.	3. Yes/no
<b>43.</b>	<b>Inspections and Maintenance of Town SCMs</b>			
	Perform and document annual inspections and maintenance of existing and new Town-owned structural SCMs	1. Maintain North Carolina SCM Inspections and Certification for appropriate personnel	1. Continuously, beginning in permit year 2	1. Number of staff members with active certifications
		2. Develop SCM inspection form	2. Permit year 2	2. Yes/no
		3. Develop an SCM inspection tracking document (see BMP No. 54)	3. Permit year 2	3. Yes/no
		4. Inspect each SCM device using SCM inspection form	5. Annually, beginning year 3	4. Number of SCMs inspected
<b>44.</b>	<b>Tracking of Notices of Violations and Enforcement Actions</b>			
	The Town will assist Buncombe County with the development of or migration to a mechanism of tracking post-construction site runoff violators	1. Communicate results of self-audit and non-compliant provisions to County	1. Permit year 1	1. Yes/no

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

	that includes tracking by location and owner, and the ability to identify chronic violators	2. Assist County with identification of necessary revisions to the County Code	2. Permit year 1	2. Yes/no
		3. Monitor County activity to adopt necessary revisions	3 Permit year 1 and 2.	3. Yes/no
<b>Permit Ref.</b>	<p><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.</p>			
<b>BMP No.</b>	<b>A</b> Description of BMP	<b>B</b> Measurable Goal(s)	<b>C</b> Schedule for Implementation	<b>D</b> Annual Reporting Metric
<b>45.</b>	<b>Pet Waste Management</b>			
	Review current ordinances (Code of Ordinances, Chapter 4 and 22) in order to determine adequacy of current regulation on pet waste management and update ordinance if required	1. Review existing ordinances and update if revision is required to provide for pet waste management	1. Permit year 1	1. Yes/no
<b>46.</b>	<b>Pet Waste Receptacles</b>			
	Install and maintain pet waste receptacles on Town-owned streets, parks and properties as deemed appropriate to encourage proper disposal of pet waste	1. Inventory the pet waste disposal receptacles maintained by Town	1. Permit year 1	1. Number of pet waste receptacles maintained
		2. Determine if additional pet waste disposal receptacles are needed	2. Permit year 2	2. Yes/no
		3. Install and maintain additional pet waste disposal receptacles as required	3. As needed, beginning in permit year 3	3. Number and location of receptacles installed

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

This SWMP provides a comprehensive pollution prevention and good housekeeping strategy for the Town of Weaverville 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

Spill response procedures are currently handled by the Public Works Department. All other components of the pollution prevention and good housekeeping measures are implemented by the Public Works Department. The Town already provides limited street cleaning and seasonal leaf collection services to residents but will begin to quantify and monitor for assessment. The Town of Weaverville will manage, implement and report the pollution prevention and good housekeeping BMPs as specified in Table 21 below for each required program.

<b>Table 21: Pollution Prevention and Good Housekeeping BMPs</b>				
<b>Permit Ref.</b>	<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.			
<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>47.</b>	<b>Inventory of Municipal Facilities</b>			
	Develop and maintain an up-to-date inventory of municipal facilities with potential to generate polluted runoff.	1. Compile and maintain a list of existing Town-owned facilities with potential to generate stormwater pollution	1. Permit year 1	1. Number of facilities identified

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

		2. Perform initial inspection of Town-owned facilities for potential to generate polluted runoff or requiring spill response procedures	2. Permit year 2	2. Number of inspections performed
		3. Determine which Town facilities required a SPCC	3. Permit year 2	3. Number of SPCC plans required
		4. Update inventory as needed when facilities are added or closed	4. As required	4. Number of facilities added/revisions made
<b>48.</b>	<b>Facility Inspections</b>			
	Inspection of Town facilities to confirm good housekeeping practices are being followed, including vehicle and equipment cleaning (see BMP No. 58)	1. Establish a SOP for Town facility inspections, including an inspection schedule, inspection report documentation, and tracking system	1. Permit year 2	1. Yes/no
		2. Implement annual facility inspections once SOP established	2. Annually, once SOP established	2. Number of inspections
<b>49.</b>	<b>Staff Training</b>			
	Develop or identify a staff training program for general stormwater pollution prevention and provide to all Public Works Department employees (see BMP No. 53); LOSRC may be providing this training.	1. Develop or identify an appropriate training program	1. Permit year 2	1. Yes/no
		2. Provide training for all existing and new Public Works employees	2. Permit year 3 and as needed	2. Number of staff trained
<b>50.</b>	<b>NPDES Industrial Permit Compliance</b>			
	Ensure that NPDES industrial permit compliance occurs at all applicable Town-owned sites/facilities	1. Review Town facilities inventory to determine if any facilities requires a NPDES Industrial Permit	1. Permit year 1	1. N/A or number of facilities determined to require a NPDES Industrial Permit
		2. Apply for or renew all NPDES industrial permits that are necessary for compliance	2. Permit year 1 if necessary following review of facilities, continuously thereafter	2. Report number of active, renewed, or new permits received
<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>A</b>	<b>B</b>	<b>C</b>	<b>D</b>

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

<b>BMP No.</b>	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
<b>51.</b>	<b>Inventory of Facilities with Spill Potential</b>			
	Develop and maintain a list of Town facilities and operations storing materials that would be a pollutant if spilled and introduced into the stormwater system and classify by hazard and quantity (see BMP No. 47)	1. Compile list of Town facilities and operations with spill potential and which involve high hazard spills	1. Permit year 1	1. Number of facilities or operations identified
2. Review and update list as facilities or operations are changed		2. Annually and when necessitated by changes in facilities or operations	2. Yes/no	
<b>52.</b>	<b>Spill Response Procedures</b>			
	Develop and maintain spill response procedures, and train appropriate staff	1. Develop SOP for spill response procedures	1. Permit year 1	1. Yes/no
		2. Train existing and new Town staff with spill responsibilities in spill response procedures	2. Permit year 1, and as required	2. Number of staff trained
		3. Review and update specific spill response procedures for Town facilities and operation with potential to produce high hazard spills	3. Permit year 2	3. Yes/no
		4. Train staff at facilities with potential for high hazard spills in first response actions and reporting procedures	4. If applicable, annually if facilities are identified and SOP established	4. Number of staff trained; or N/A
5. Review and update SOP as facilities and operations are changed		5. As required	5. Yes/no	
<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>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>53.</b>	<b>Staff Training</b>			
	Develop or identify a staff training program for general stormwater pollution prevention and provide to Public Works Department and other appropriate staff. LOSRC may be providing this training.	1. Develop or identify an appropriate training program	1. Permit year 2	1. Yes/no
2. Provide training for all existing and new Public Works employees		2. Permit year 3 and as needed	2. Number of staff trained	

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

54.	<b>MS4 System Inspections and Maintenance</b>			
	Develop a proactive plan for MS4 system maintenance which requires regular inspections and maintenance and verify, document, and prioritize maintenance activities identified by inspections or citizen reports Continuously, as potential maintenance activities are identified	1. Develop a SOP that includes proactive inspection schedules, standard documentation, staff responsibilities, and proper maintenance training	1. Permit year 2	1. Yes/no
		2. Develop an inspection and maintenance tracking system to be used in accordance with the SOP and to identify “hot spot” locations for system maintenance	2. Permit year 2	2. Yes/no
		3. Perform regular inspections in accordance with the SOP	3. Following schedule established in SOP, once SOP and tracking system are established	3. Number of inspections documented
<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 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>
55.	<b>Inventory and Mapping of Municipal Structural SCMs</b>			
	Develop and maintain a current inventory of Town-owned structural SCMs and reflect those structures on the Town’s MS4 map; develop and maintain an operation and maintenance program for the Town-owned structural SCMs	1. Create an inventory of existing Town-owned SCMs with information including type, year built, date last inspected, and maintenance actions	1. Permit year 1	1. Number of Town-owned structural SCMs
		2. Locate and add Town-owned SCMs to the MS4 map with type of SCM indicated	2. Permit year 1	2. Yes/no
		3. Develop an O&M Plan that addresses all Town-owned SCMs	3. Permit year 2	3. Yes/no
		4. Update the MS4 map as new Town-owned SCMs are constructed	4. Annually, once mapping is completed	4. Yes/no
		5. Update O&M plans as needed for new Town development	5. As required	5. Yes/no
56.	<b>Inspections and Maintenance of Town SCMs</b>			



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

	Perform and document annual inspections and maintenance of existing and new Town-owned structural SCMs and perform maintenance tasks identified in inspections	1. Maintain North Carolina SCM Inspections and Certification for appropriate personnel	1. Continuously, beginning in permit year 2	1. Number of staff members with active certifications
		2. Develop SCM inspection form	2. Permit year 2	2. Yes/no
		3. Develop an SCM inspection tracking document	3. Permit year 2	3. Yes/no
		4. Inspect each SCM device using SCM inspection form	5. Annually, beginning year 3	4. Number of SCMs inspected
<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>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>57.</b>	<b>Staff Certification in Pesticide, Herbicide and Fertilizer Application</b>			
	Provide training opportunities to ensure that staff is certified (or recertified) in Right-of-Way Pest Control, Public Health Control, and Ornamental & Turf Pest Control applicator certifications for safe application of landscape chemicals	1. Document certifications (or recertification) of staff applying landscape chemicals	1. Annually	1. Number of staff certified (or recertified)
<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 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.			
<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>58.</b>	<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 facilities are following proper procedures to minimize water quality impacts from vehicle and equipment cleaning and maintenance	1. Develop an inspection checklist	1. Permit year 2	1. Yes/no
		2. Perform inspections using inspection checklist and notify facility manager of any corrective actions required	2. Bi-annually, beginning in permit year 3	2. Number of inspections
	Perform re-inspections of any facility that required corrective action			

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

<b>59.</b>	<b>Staff Training</b>			
	Develop or identify a staff training program for general stormwater pollution prevention and provide to employees working in vehicle maintenance and cleaning areas. LOSRC may provide this training.	1. Develop or identify an appropriate training program	1. Permit year 2	1. Yes/no
		2. Provide training for all existing and new Public Works employees	2. Permit year 3 and as needed	2. Number of staff trained
<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>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>60.</b>	<b>Street Cleaning</b>			
	Perform periodic street cleaning activities in order to reduce pollutants from Town-owned and maintained streets	1. Develop a SOP including a schedule and plan to document street cleaning activities	1. Permit year 2	1. Yes/no
		2. Implement SOP and document activities	2. Permit year 2 and annually thereafter	2. Estimated length of streets cleaned (miles)
<b>61.</b>	<b>Leaf Collection</b>			
	Perform periodic collection of leaves from residential and public areas to reduce pollutants and obstruction of stormwater drainage system inlets	1. Develop a SOP including a schedule and plan to document leaf collection activities	1. Permit year 1	1. Yes/no
		2. Implement SOP and document activities	2. Regularly, beginning in permit year 1	2. Volume of leaves collected (cubic yards)
		3. Provide public education on website about need to keep leaf debris out of the streets and storm drainage system	3. Permit year 2	3. Yes/no
<b>62.</b>	<b>Vehicle Spill/Leak Cleanup</b>			
	Develop and implement an organized vehicle spill cleanup response to prevent pollutants from vehicular accidents from entering the stormwater drainage system	1. Develop SOP specific to public safety response to accidents	1. Permit year 1	1. Yes/no
		2. Implement SOP and document activities	2. Regularly, beginning in permit year 1	2. Yes/no
		3. Provide public education on website about stopping vehicle leaks	3. Permit year 2	3. Yes/no
<b>63.</b>	<b>Litter Management</b>			

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

	Periodic collection and public education related to reducing litter from residential and public areas to reduce pollutants and clogging of storm system inlets	1. Identify areas with litter issues	1. Permit year 1, and annually	1. Yes/no
		2. Post social media article about litter prevention	2. Annually permit years 1 through 5	2. Yes/no
		3. Provide public education on website about reducing litter	3. Permit year 2	3. Yes/no
		4. Create and implement strategy to reduce litter in areas identified with litter issues	4. Permit year 2, and as needed	4. Yes/no