



Town of Black Mountain

160 Midland Avenue • Black Mountain, North Carolina 28711
Phone (828) 419-9310 • Fax (828) 669-4204 • TDD 800-735-2962
www.townofblackmountain.org

Mayor
Larry B. Harris

Town Manager
Josh Harrold

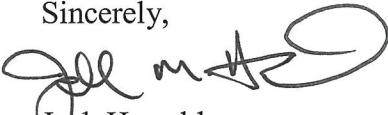
Town Council
Vice-Mayor Ryan Stone
Council Member Archie Pertiller
Council Member Pam King
Council Member Doug Hay
Council Member Bill Christy

Town Clerk
Savannah Parrish

To Jeanette Powell:

This letter provides authorization for Jessica Trotman, the Director of Planning and Development to oversee matters related to the NPDES and broadly, stormwater management in Black Mountain. The town is committed to gaining compliance with the NPDES permit through the successful implementation of this document, and appreciates the guidance provided through this process.

Sincerely,


Josh Harrold
Town Manager

RECEIVED
SEP 07 2021
DENR-LAND QUALITY
STORMWATER PERMITTING

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>Jessica G. Trotman</i>
<i>Print Name:</i>	<i>Jessica G. Trotman, MSEH</i>
<i>Title:</i>	<i>Planning Director</i>
Signed this	<i>July 23</i> day of 20 <i>21</i> .

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SEP 07 2021

DENR-LAND QUALITY
STORMWATER PERMITTING

Draft Stormwater Management Plan

Town of Black Mountain

NCS000422

April 2021



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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 Black Mountain 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 Black Mountain 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 NCS000422, 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 Black Mountain and located within the corporate limits of the Town of Black Mountain.

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

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

PART 2: CERTIFICATION

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

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

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

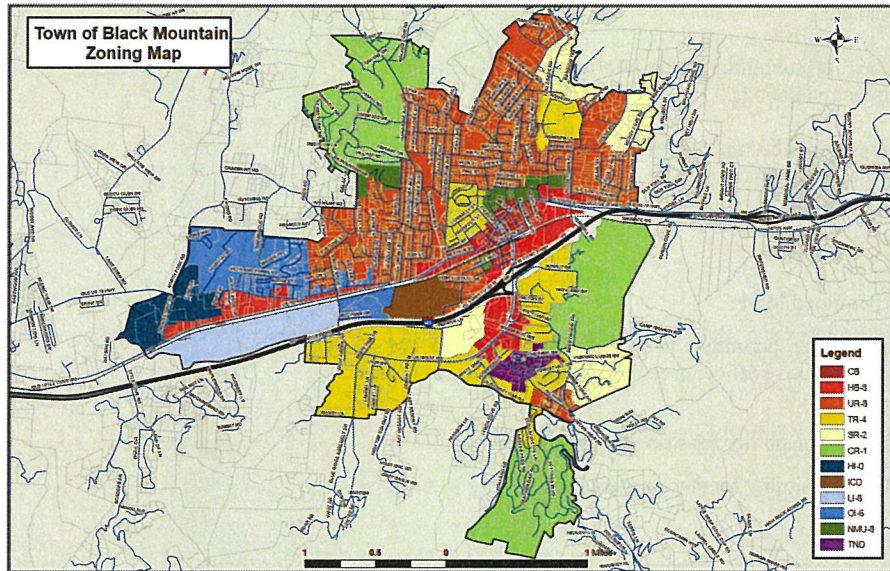
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<i>Signature:</i>	
<i>Print Name:</i>	<i>Jessica G. Trotman, MSEH</i>
<i>Title:</i>	<i>Planning Director</i>
Signed this <input type="text"/> day of 20 <input type="text"/> .	

PART 3: MS4 INFORMATION

3.1 Permitted MS4 Area

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



3.2 Existing MS4 Mapping

The current MS4 mapping includes inlets, outfalls and stormwater pipes. Some details are available for each location within the mapping tool, such as basic assessment of condition, size and photo.

<http://bmt.maps.arcgis.com/apps/webappviewer/index.html?id=b71b29247aa14a47a8a8a64c49de0dc0>

Table 1: Summary of Current MS4 Mapping

Percent of MS4 Area Mapped	unknown	%
No. of Major Outfalls* Mapped	138	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 Black Mountain 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:

- 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
Unnamed tributaries to Swannanoa River	6-78	C	
Unnamed tributaries to North Fork	6-78-11-(13)	C	
Swannanoa River	6-78	C	Benthos (Nar, AL, FW)
Tomahawk Branch	6-78-9	B	
Unnamed tributaries to Tomahawk Branch	6-7-9	B	
Bryar Branch	6-78-10-4	B	
Wolfpit Branch	6-78-10-(2)	C	
Laurel Branch	6-78-8-(2)	B, Tr	
Camp Branch	6-78-7	C	
Unnamed tributary to Camp Branch	6-78-7	C	
Lynch Creek	6-78-7-2		
Britton Creek	6-78-7-1	C	
Flat Creek	6-78-6-(4)	C	
Unnamed tributary to Flat Creek	6-78-6-(4)	C	

3.4 MS4 Interconnection

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

The Town of Black Mountain MS4 is not interconnected with another regulated MS4.

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

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

3.5 Total Maximum Daily Loads (TMDLs)

The Town of Black Mountain is not subject to TMDLs. The Town is working in increase best management practices particularly in areas of operation of town owned facilities as well as community education and outreach to generally contribute to improving water quality conditions in the watershed.

3.6 Endangered and Threatened Species and Critical Habitat

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

Commented [JT1]: These are known in Buncombe County, but I do not know of their distribution or concentration within our town limits proper.

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

<i>Hedyotis purpurea</i> var. <i>montana</i>	Roan Mountain bluet	Endangered	Flowering Plants
<i>Alasmidonta raveneliana</i>	Appalachian elktoe	Endangered	Clams
<i>Calamagrostis cainii</i>	Cain's reedgrass	Species of Concern	Flowering Plants
<i>Spiraea virginiana</i>	Virginia spiraea	Threatened	Flowering Plants
<i>Cambarus reburus</i>	French Broad crayfish	Species of Concern	Crustaceans
<i>Loxia curvirostra</i>	Red crossbill	Species of Concern	Birds
<i>Microhexura montivaga</i>	Spruce-fir moss spider	Endangered	Arachnids
<i>Plagiochila virginica</i> var. <i>caroliniana</i>	[Unnamed] liverwort	Species of Concern	Flowering Plants
<i>Gymnoderma lineare</i>	Rock gnome lichen	Endangered	Lichens
<i>Aegolius acadicus</i>	northern saw-whet owl	Species of Concern	Birds
<i>Buckleya distichophylla</i>	Piratebush	Species of Concern	Flowering Plants
<i>Myotis grisescens</i>	Gray bat	Endangered	Mammals
<i>Solidago spithamea</i>	Blue Ridge goldenrod	Threatened	Flowering Plants
<i>Packera millefolia</i>	Piedmont ragwort	Species of Concern	Flowering Plants

<i>Myotis septentrionalis</i>	Northern Long-Eared Bat	Threatened	Mammals
<i>Glaucmys sabrinus coloratus</i>	Carolina northern flying squirrel	Endangered	Mammals
<i>Sarracenia rubra ssp. jonesii</i>	Mountain sweet pitcher-plant Granite Dome	Endangered	Flowering Plants Flowering Plants
<i>Solidago simulans</i>	Goldenrod	Species of Concern	Plants
<i>Fumontana deprehendor</i>	No common name	Species of Concern	Arachnids Flowering Plants
<i>Lilium grayi</i>	Gray's lily	Species of Concern	Plants Flowering Plants
<i>Geum radiatum</i>	Spreading avens	Endangered	Plants
<i>Phyciodes batesii macconensis</i>	Southern tawny crescent	Species of Concern	Insects Conifers and
<i>Abies fraseri</i>	Fraser fir	Species of Concern	Cycads Flowering Plants
<i>Hexastylis rhombiformis</i>	French Broad heartleaf	Species of Concern	Plants

3.7 Industrial Facility Discharges

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

Table 5: NPDES Stormwater Permitted Industrial Facilities

Permit Number	Facility Name
NCG080053	Ingles Markets Facility
NCG030600	Kearfott Corporation - Motion Systems Division
NCG160191	Hammaker East, Ltd.
NCG140166	Southern Concrete Mat-Buncombe
NCG020150	Grove Stone & Sand Company
NCS000422	Black Mountain town - Small MS4

3.8 Non-Stormwater Discharges

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

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

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 Black Mountain to determine whether they may significantly impact water quality.

Table 6: Non-Stormwater Discharges

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

3.9 Target Pollutants and Sources

In addition to those target pollutants identified above, the Town of Black Mountain is aware of other significant water quality issues within the permitted MS4 area. These include the following:

- Citizen reports of sedimentation in Lake Tomahawk related to Tomahawk Branch and the unpaved, gravel walk trail around the lake
- Citizen reports of large volumes of sediment heavy water traversing and/or pooling at multiple intersections caused by a combination of rain, steep slope, and development conditions

- Citizen and town staff observations of litter at public parks, greenways and in residential districts of the town.

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

Table 7: Summary of Target Pollutants and Sources

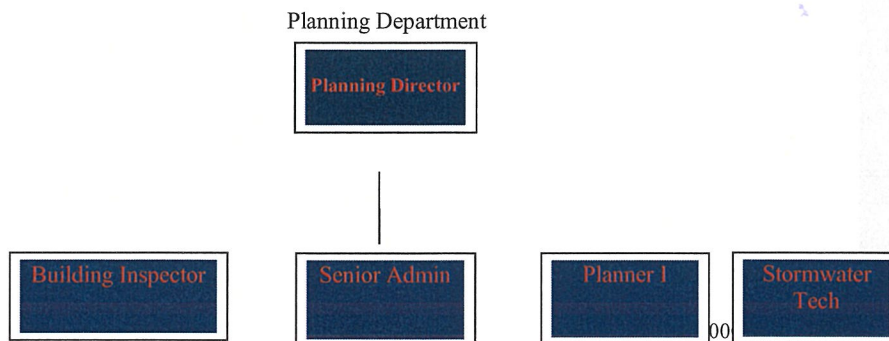
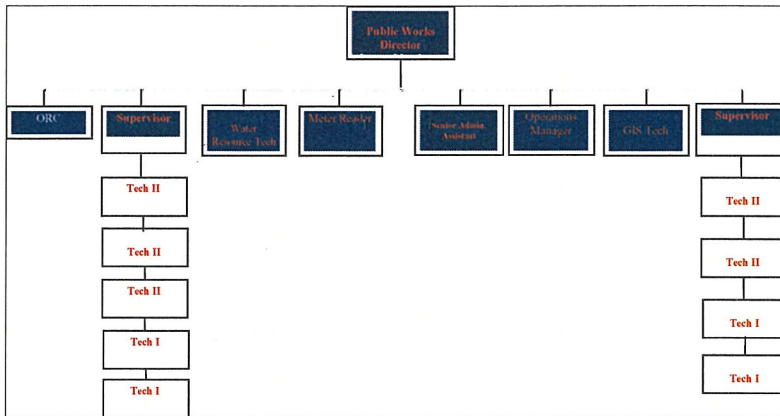
Target Pollutant(s)	Likely Source(s)/Target Audience(s)	SWMP Program Addressing Target Pollutant(s)/Audience(s)
Litter	Residential, commercial, schools	Public education & outreach, public involvement & participation, pollution prevention & good house keeping
Sediment	Construction	Post Construction Ordinance
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
Yard wastes	Residential, commercial	Public education & outreach, pollution prevention & good housekeeping
Fecal Coliform	Sewer overflows, failing septic systems, wildlife, illicit discharges	Public education & outreach, illicit discharge detection & elimination
Illegal discharges	Residential, commercial, industrial, municipal employees	Public education & outreach, pollution prevention & good housekeeping
Illegal dumping	Residential, commercial, industrial, municipal employees	Public education & outreach, pollution prevention & good housekeeping
Improper disposal of waste	Residential, commercial, industrial, municipal employees,	Public education & outreach, pollution prevention & good housekeeping
General non-point source pollution	Residential, commercial, schools, municipal employees	Public education & outreach, pollution prevention & good housekeeping

PART 4: STORMWATER MANAGEMENT PROGRAM ADMINISTRATION

4.1 Organizational Structure

The Stormwater Program is created and managed by the Planning Director with close collaboration of Public Works and support of the Town Manager. The Planning Director manages administration, policy outreach and implementation of the plan. The Public Works Director and staff provide information about current conditions and support implementation. Public Works staff is the boots on the ground, improving draining systems, managing infrastructure and are the first line of defense (along with residents) in stopping illicit discharges and connections. The Town is actively pursuing a stormwater utility and will hire a stormwater field tech when adopted.

This is the organization chart for Public Works. Those positions noted in red indicate hands on service deliver and/or management of the stormwater effort noted in the table below.



Administration

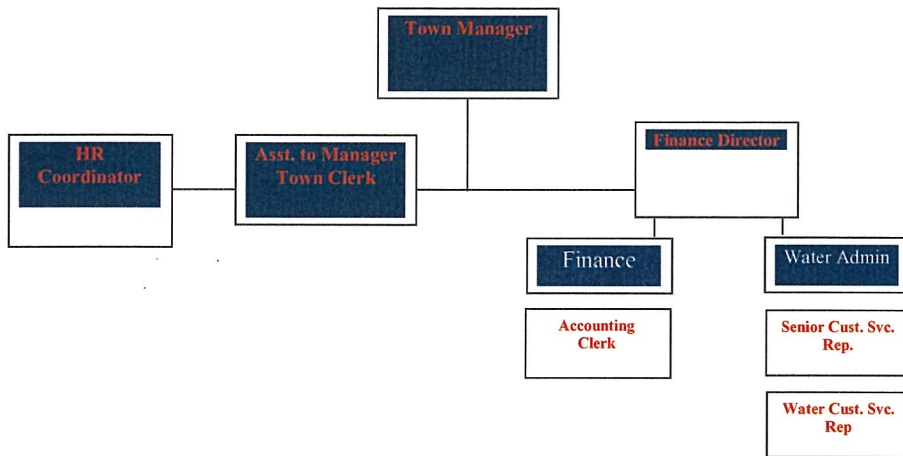


Table 8: Summary of Responsible Parties

SWMP Component	Responsible Position	Staff Name	Department
Stormwater Program Administration	Planning Director	Jessica Trotman	Planning and Development
SWMP Management	Planning Director	Jessica Trotman	Planning and Development
Public Education & Outreach	Planning Director	Jessica Trotman	Planning and Development

Public Involvement & Participation	Planning Director	Jessica Trotman	Planning Director
Illicit Discharge Detection & Elimination	Planning Director	Jessica Trotman	Planning and Development
Construction Site Runoff Control	Building Official Buncombe County Sedimentation and Erosion Control	Building Inspector BC Planning Staff	Planning and Development BC Planning
Post-Construction Stormwater Management	Planning Director	Jessica Trotman	Planning and Development
Pollution Prevention/Good Housekeeping for Municipal Operations	Public Works Director	Jamey Matthews	Public Works
Municipal Facilities Operation & Maintenance Program	Public Works Director	Jamey Matthews	Public Works
Spill Response Program	Fire Chief	Scottie Harris	Fire Department
MS4 Operation & Maintenance Program	Planning Director	Jessica Trotman	Planning and Development
Municipal SCM Operation & Maintenance Program	Planning Director	Jessica Trotman	Planning and Development
Pesticide, Herbicide & Fertilizer Management Program	Public Works Director Town Manager	Jamey Matthews Josh Harrold	Public Works Golf Course
Vehicle & Equipment Cleaning Program	Public Works Director Fire Chief Police Chief	Jamey Matthews Scottie Harris Shawn Freeman	Public Works Fire Department Police Department

Pavement Management Program	Public Works Director	Jamey Matthews	Public Works
Total Maximum Daily Load (TMDL) Requirements	Planning Director	Jessica Trotman	Planning and Development

4.2 Program Funding and Budget

In accordance with the issued permit, the Town of Black Mountain 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 funding for the stormwater program comes exclusively from fund balance; however, the town is formally exploring establishing a stormwater utility.

The town also seeks grants for projects to improve stormwater quality and reduce stormwater quantity as they become available. The town acknowledges the lack of appropriate funding and is committed to finding ways to increase program funding. These grants are used for typically used for SCM installation and stream restoration projects. Not all of these projects are directly related to NPDES compliance, however, do hold benefit to the watershed in general.

The town has completed a stormwater utility study. The Town Council will consider the proposal for adoption and implementation in FY 21-22. Projected revenue will vary on adopted rate structure, but could be approximately \$350,000 per year.

Currently the town funds staff positions of which a percentage of their work is related to stormwater. A conservative estimates of these percentages are:

Public works crews	\$56,000
Public Works Director	\$15,000
Town Manager	\$20,000
Planning Director	\$15,000
Building Inspector	\$8,000
Total	\$114,000

4.3 Shared Responsibility

The Town of Black Mountain 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 Black Mountain 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 Black Mountain 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

The Town of Black Mountain shares the responsibility to implement the following permit requirements. Table 9 summarizes the programs and entities.

SWMP BMP or Permit Requirement	Implementing Entity & Program Name	Legal Agreement (Y/N)
Construction Site Runoff Control Program	Buncombe County Sedimentation and Erosion Control	Y
Fecal Coliform Reduction	Buncombe County Health Department	Y

4.4 Co-Permittees

The are no other entities applying for co-permittee status under the NPDES MS4 permit number NCS000422 for the Town of Black Mountain. 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	N/A	N/A	N/A

4.5 Measurable Goals for Program Administration

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

Table 11: Program Administration BMPs				
Permit Ref.	2.1.2 and Part 4: Annual Self-Assessment Measures to evaluate the performance and effectiveness of the SWMP program components at least annually. Results shall be used by the permittee to modify the program components as necessary to accomplish the intent of the Stormwater Program. The self-assessment reporting period is the fiscal year (July 1 – June 30).			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
1.	Annual Self-Assessment			
	Perform an annual evaluation of SWMP implementation, suitability of SWMP commitments and any proposed changes to the SWMP utilizing the NCDEQ Annual Self-Assessment Template.	1. Prepare, certify and submit the Annual Self-Assessment to NCDEQ prior to August 31 each year.	1. Annually for Permit Years 1 – 4 (FY19/20 – FY22/23)	1. Annual Self-Assessment received by NCDEQ no later than August 31 each year., Yes/No
Permit Ref.	1.6: Permit Renewal Application Measures to submit a permit renewal application no later than 180 days prior to the expiration date of the NPDES MS4 permit.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
2.	Permit Renewal Application			

Table 11: Program Administration BMPs				
	Audit stormwater program implementation for compliance with the permit and approved SWMP, and utilize the results to prepare and submit a permit renewal application package.	1. Participate in an NPDES MS4 Permit Compliance Audit, as scheduled and performed by EPA or NCDEQ.	1. TBD – Typically Permit Year 4	1. yes/no/status
		2. Self-audit and document any stormwater program components not audited by EPA or NCDEQ utilizing the DEQ Audit Template. . Submit Self-Audit to DEMLR (required component of permit renewal application package).	2. Permit Year 5	2. Yes/No/Partial
		3. Certify the stormwater permit renewal application (Permit renewal application, Self-Audit, and Draft SWMP for the next 5-year permit cycle) and submit at least 180 days prior to permit expiration.	3. Permit Year 5	3. date submitted
Permit Ref.	2.1.1: Adequate Funding and Staffing The permittee shall maintain adequate funding and staffing to implement and manage the provisions of the SWMP and meet all requirements of this permit.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
3.	Adequate funding			
	Conduct a fiscal analysis with available data and explore options to fully fund the stormwater program and meet all requirements of the permit.	1. Complete fiscal analysis and determine gap	1. Permit Year 1	1. yes/no/status
		2. Determine available mechanism and funding options	2. Permit Year 1	2. Yes/No/Status
		3. Select funding mechanism(s)	3. Permit Year 1	3. yes/no/status
		4. Implement funding mechanism	4. Permit Year 2-5	4. Yes/no/status

PART 5: PUBLIC EDUCATION AND OUTREACH PROGRAM

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

Select Achievements

- In 2019 the Town held two well-attended workshops in partnership with RiverLink. The first was a rain garden installation and certification course. The second was designed to teach citizens with river/stream property how to be resilient and manage their property in a way that is environmentally sensitive.
- Staff also launched a new highly informative website for citizens and developers to utilize.
- The stormwater hotline has been established and promoted through a variety of outlets, including a “report-a-polluter” flyer sent out in over 3,000 water bills.
- Stormwater activity books were created and given to third grade classes participating in Town Hall Day in November.
- Stormwater materials are now included in the development resources provided to homeowners/contractors/developers when applying for permits.

Table 12: Summary of Target Pollutants & Audiences

Target Pollutants/Sources	Target Audience(s)
Nutrients	Residential, commercial, schools, municipal employees
Car Washing	Residential, municipal employees
Illicit Discharges	Residential, commercial, schools, industrial, municipal staff
Illegal Dumping	Residential, commercial, schools, industrial, municipal staff
Improper Disposal of Waste	General Public, Businesses, Municipal Employees, Construction Professionals
Litter	Residential, commercial, schools
Yard Waste	Residential, commercial, municipal employees
Sediment	Construction professionals
Fecal coliform	Residential, commercial, schools
Improper disposal of waste	Residential, commercial, industrials, municipal employees
General non-point source pollution	Residential, commercial, schools, municipal employees

The town has been successful in engaging these communities using social media, partnering with RiverLink and the town’s Beautification Committee, to help get information into the community. The pandemic has made working with schools more difficult, but we have e-mail links to activities and videos that could be used during remote learning. We also include stormwater information into the Citizen’s Academy, which is held once a year.

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

Table 13: Public Education and Outreach BMPs				
Permit Ref.	3.2.2 and 3.2.4: Outreach to Targeted Audiences			
	Measures to identify the specific elements and implementation of a Public Education and Outreach Program to share educational materials to the community or conduct equivalent outreach activities about the impacts of stormwater discharges on water bodies and how the public can reduce pollutants in stormwater runoff. The permittee shall provide educational information to identified target audiences on pollutants/sources identified in table 12 above, and shall document the extent of exposure of each media, event or activity, including those elements implemented locally or through a cooperative agreement.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
4.	Informational Website			
	Design and promote a website dedicated to stormwater education and information. Provide information about the NPDES permit, ordinances, hotline contact, promote workshops/activities, and opportunities for involvement.	1. Redesign/improve existing web site	1. Year 1	1. date update is complete, link to website
		2. Maintain the website	2. Annually after update	2. date website is updated
		3. Review page hits (part of existing web service)	3. Annually after update	3. the number of views the pages receives
5.	Stormwater Hotline			
	A hotline will be maintained for citizens to report stormwater issues and ask stormwater quests.	1. Update existing hotline. Assign new staff person to check the calls.	1. Annually, Permit Year 1	1. date of updates
		2. Train responsible staff in general stormwater knowledge and how to direct the caller to the correct party.	2. Permit Year 1	2. Yes/no/status

Table 13: Public Education and Outreach BMPs

		3. Promote the hotline in materials developed for the stormwater program and on stormwater website.	3. Annually beginning in Permit Year 1	3. Number and type of calls.
6.	Social Media Campaign			
	Use existing SM accounts to post at least once per year about stormwater.	1. Post about illicit discharge	1. Year 1	1. date of the post
		2. Post about car washing	2. Permit Year 2	2. date of the post
		3. Post about fertilizer run off	3. Permit Year 3	3. date of the post
		4. Post about residential stormwater mgmt. techniques	4. Permit Year 4	4. date of the post
5. Post about fecal coliform		5. Permit Year 5	5. date of the post	
7.	Partnership with RiverLink			
	The Town will engage with the local non-profit RiverLink to develop educational and outreach initiatives that will be managed by the town but carried out RiverLink. Initiatives will focus on residential and construction audiences within the MS4 area.	1. Review Program options and enact MOU between organizations	1. Permit Year 1	1. date of MOU
		2. Select two programs	2. Permit Year 1	2. yes/no/status
		3. Implement selected programs at determined frequency	3. Annually Permit Years 2-5	3. frequency and number of participants for each

PART 6: PUBLIC INVOLVEMENT AND PARTICIPATION PROGRAM

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

Select Accomplishments

- The new stormwater website includes information about local volunteering opportunities related to stormwater and water quality in general.
- Staff created a complaint for specifically for stormwater issues.
- Staff created a stormwater survey which is posted on the stormwater website and will remain indefinitely to measure trends overtime.

Table 14: Public Involvement and Participation BMPs				
Permit Ref.	3.3.1: Public Input Mechanisms for public involvement that provide for input on stormwater issues and the stormwater program.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
8.	Community Survey			
	Develop a survey to post annually to gain feedback on stormwater programs and services.	1. Create survey and post to stormwater website.	1. Year 1	1. Date survey is live
		2. Evaluate survey for edits/expansion	2. Annually after established	2. number of changes and dates made and number of participants
		3. Report survey findings to Town Council and Staff	3. Annually Permit Years 2-5	3. Date findings and presented
9.	Maintain Helpline/Hotline – SEE BMP No.5			
10.	Stormwater Page on Town Website – SEE BMP No.4			
Permit Ref.	3.3.2: Volunteer Opportunities Measures to provide volunteer opportunities designed to promote ongoing citizen participation.			
	A	B	C	D

Table 14: Public Involvement and Participation BMPs

BMP No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
11.	Promotion of Volunteer Opportunities in the Community			
	Promote volunteer opportunities designed to promote citizen participation.	1. ID opportunities	1. Year 1	1. number of ID'd opportunities
		2. Post to website	2. Year 1	2. number of opportunities provided
		3. Post updates	3. Annually, beginning permit year 2	3. number of opportunities provided in each update
12.	Annual Litter Sweep			
	The Town will hold a semi-annual event in spring and fall that will focus on removing litter from public spaces and streams along greenways/trails that have the potential to pollute stormwater.	1. Identify public areas that could be cleaned by volunteers.	1. Permit Year 1	1. Yes/no/status
		2. Coordinate cleanup of public areas with support from Parks & Recreation and Public Works as part of "Big Sweep" event.	2. Semi-Annually, beginning in permit year 1	2. number of participants number of trash bags filled

PART 7: ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM

The Town of Black Mountain 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.

Select Accomplishments

- IDDE training and training update schedule established for relevant staff.
- IDDE manual written and provided to staff.

Table 15: Illicit Discharge Detection and Elimination BMPs				
Permit Ref.	3.4.1: MS4 Map Measures to develop, update and maintain a municipal storm sewer system map including stormwater conveyances, flow direction, major outfalls and waters of the United States receiving stormwater discharges.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
13.	Improve existing MS4 Map			
	Review existing inventory of outfalls. Distinguish major outfalls from the total number of outfalls. Review locations on the ground to ensure all major outfalls are accounted for. Note receiving waters and flow directions.	1. Distinguish major outfalls in current GIS layer.	1. Permit Year 1	1. number and types of changes made
		2. Ground truth location and condition of major outfalls. Add anything new that is located; modify attributes of other outfalls if discovered.	2. Permit Year 2	2. when edits are completed
		3. Add receiving waters and flow direction.	3. Permit Year 3	3. when map update is complete
14.	Continual Update of MS4 Map			
	The MS4 map will be updated as infrastructure is located in the field or when anything is added or deleted from the system. Condition of the	1. When outfalls, inlets or pipes are located or constructed they will be added to the map	1. Annually beginning in Permit Year 2	1. number of changes made and type of changes made.

Table 15: Illicit Discharge Detection and Elimination BMPs

	infrastructure will be updated through asset assessment and management efforts.	2. Update attributes information for inlets, outfalls or pipes.	2. Annually beginning Permit Year 2	2. number of inlets/outfalls/pipes by condition
Permit Ref.	3.4.2: Regulatory Mechanism Measures to provide an IDDE ordinance or other regulatory mechanism that provides legal authority to prohibit, detect, and eliminate illicit connections and discharges, illegal dumping and spills into the MS4, including enforcement procedures and actions.			
BMP No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
15.	Maintain Legal Authority			
	Review all applicable stormwater and pollution prevention ordinances, including enforcement procedures. Update any ordinances if required.	1. Review ordinances and update revisions needed to maintain legal authority.	1. Year 1	1. number of revisions required and number of revisions made.
Permit Ref.	3.4.3: IDDE Plan Measures to maintain and implement a written IDDE Plan to detect and address illicit discharges, illegal dumping and any non-stormwater discharges identified as significant contributors of pollutants to the MS4. The plan shall provide standard procedures and documentation to: <ul style="list-style-type: none"> a) Locate priority areas likely to have illicit discharges, b) Conduct routine dry weather outfall inspections, c) Identify illicit discharges and trace sources, d) Eliminate the source(s) of an illicit discharge, and e) Evaluate and assess the IDDE Program. 			
BMP No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
16.	Outfall Inspections			
		1. Hire stormwater tech	1. Permit Year1	1. Date stormwater tech is hired

Table 15: Illicit Discharge Detection and Elimination BMPs				
	Conduct regular dry weather (no rain in previous 72 hours) to seek out illicit discharges and connections	2. Train stormwater tech for outfall inspections and investigations. 3. Split major outfalls into five groups (or fewer if possible) so that each group is inspected at least once per permit cycle.	2. Permit Year 1 3. Annually beginning permit year 2	2. date of training and topics covered. 3. yes/no/status
17.	Illicit Discharge Identification Procedure			
	Revise and maintain a standard operating procedure for investigations of potential illicit discharges and illegal dumping.	1. Revise current draft of the IDDE plan with new staff. 2. Maintain a written IDDE program	1. Year 1 2. Continuously	1. Yes/No/Status 2. yes/no/status
18.	IDDE Program Evaluation			
	Annual evaluation of IDDE program to promote continual improvement and identification of potential areas of concern.	1. Evaluation meeting with IDDE program staff. 2. Review IDDE reports and identification of "repeat offenders" and or "hot spots" areas	1. Annually beginning permit year 2. 2. Annually beginning year 2	1. Yes/No/Status 2. number of potential illicit discharges, number of discharges verified, and number of discharges resolved and number of enforcement actions taken.
Permit Ref.	3.4.6: IDDE Reporting Measures for the public and staff to report illicit discharges, illegal dumping and spills. The mechanism shall be publicized to facilitate reporting and shall be managed to provide rapid response by appropriately trained personnel.			
BMP No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
19.	Stormwater Hotline – SEE BMP No. 5			
20.	Stormwater Page on Town Websites – SEE BMP No.4			

PART 8: CONSTRUCTION SITE RUNOFF CONTROL PROGRAM

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

Select Accomplishments

- The Town recently updated the post-construction ordinance. The area disturbed to require this particular permit is now 5,000 square feet and the storm size is now a 10-year storm.
- All permits are screened for the stormwater requirement, by the zoning administrator.
- The Building Inspector supports the stormwater plan process by fielding questions and providing the application package to the Town’s consulting engineer who determines if the applicant has met the standards of the ordinance.

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

Permit Reference	State or Local Program Name	Legal Authority	Implementing Entity	Meets Whole or Part of Requirement
3.5.1 – 3.5.4	Buncombe County Delegated SPCA Program*	15A NCAC Chapter 04 Town of Black Mountain R-93-09 (adopted April 12, 1993)	Town of Black Mountain	Whole

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

Table 17: Construction Site Runoff Control BMPs				
Permit Ref.	3.5.6: Public Input Measures to provide and promote a means for the public to notify the appropriate authorities of observed erosion and sedimentation problems.			
BMP No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
21.	Municipal Staff Training			
	Train municipal staff who receive calls from the public on the protocols for referral and tracking of construction site runoff control complaints.	1. Train municipal staff on proper handling of construction site runoff control complaints.	1. Annually beginning permit year 1	1. number of staff trained, training topics covered
22.	Stormwater Hotline – SEE BMP No.5			
Permit Ref.	3.5.5: Waste Management Measures to require construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impact to water quality.			
BMP No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
23.	Establish and Maintain Legal Authority			
	Develop and implement an ordinance to require construction site operators to control waste.	1. Review existing ordinance and make revisions as needed.	1. Permit year 1	1. yes/no/status
		2. Maintain legal authority.	2. Continuously after and changed are adopted.	2. yes/no status
24.	Contractor Education			
	Communicate waste management requirements to contractors.	1. Create fact sheet to be provided to all issued building permits.	1. Permit year 1	1. yes/no/status

Table 17: Construction Site Runoff Control BMPs				
		2. Add fact sheet to website.	2. Permit year 1	2. yes/no status

PART 9: POST-CONSTRUCTION SITE RUNOFF CONTROL PROGRAM

This SWMP identifies the minimum elements to develop, implement and enforce a program to address stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that are located within the Town of Black Mountain 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 Black Mountain 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
None	N/A	N/A

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

Table 19: Summary of Existing Post-Construction Program Elements

Permit Requirements for Plan Review and Approval	Municipal Ordinance/Code Reference(s) and/or Document Title(s)	Date Adopted
3.6.2(a) Authority	Town of Black Mountain Stormwater Phase II Ordinance	Updated and adopted October 2019
3.6.3(a) & 15A NCAC 02H.0153(c) Federal, State & Local Projects	Town of Black Mountain Stormwater Phase II Ordinance	Updated and adopted October 2019
3.6.3(b) Plan Review	Town of Black Mountain Stormwater Phase II Ordinance	Updated and adopted October 2019
3.6.3(c) O&M Agreement	Town of Black Mountain Stormwater Phase II Ordinance	Updated and adopted October 2019
3.6.3(d) O&M Plan	Town of Black Mountain Stormwater Phase II Ordinance	Updated and adopted October 2019
3.6.3(e) Deed Restrictions/Covenants	Town of Black Mountain Stormwater Phase II Ordinance	Updated and adopted October 2019
3.6.3(f) Access Easements	Town of Black Mountain Stormwater Phase II Ordinance	Updated and adopted October 2019
Permit Requirements for Inspections and Enforcement	Municipal Ordinance/Code Reference(s) and/or Document Title(s)	Date Adopted
3.6.2(b) Documentation	Town of Black Mountain Stormwater Phase II Ordinance	Updated and adopted October 2019
3.6.2(c) Right of Entry	Town of Black Mountain Stormwater Phase II Ordinance	Updated and adopted October 2019
3.6.4(a) Pre-CO Inspections	Town of Black Mountain Stormwater Phase II Ordinance	Updated and adopted October 2019
3.6.4(b) Compliance with Plans	Town of Black Mountain Stormwater Phase II Ordinance	Updated and adopted October 2019
3.6.4(c) Annual SCM Inspections	Town of Black Mountain Stormwater Phase II Ordinance	Updated and adopted October 2019
3.6.4(d) Low Density Inspections	Town of Black Mountain Stormwater Phase II Ordinance	Updated and adopted October 2019

3.6.4(e) Qualified Professional	Town of Black Mountain Stormwater Phase II Ordinance	Updated and adopted October 2019
Permit Requirements for Fecal Coliform Reduction	Municipal Ordinance/Code Reference(s) and/or Document Title(s)	Date Adopted
3.6.6(a) Pet Waste	Livestock, not bet waste addressed	2010
3.6.6(b) On-Site Domestic Wastewater Treatment	Language in the ordinance as well as regulations by county environmental health.	Updated and adopted October 2019

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

Table 20: Post Construction Site Runoff Control BMPs				
Permit Ref.	3.6.5(a), 3.6.5(b), and 4.1.3: Minimum Post-Construction Reporting Requirements Measures to document activities over the course of the fiscal year (July 1 – June 30) including appropriate information to accurately describe progress, status, and results.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
25.	Standard Reporting			
	Implement standardized tracking, documentation, inspections and reporting mechanisms and 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. Maintain inventory of high and low density projects.
		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 after inventory is established	3. 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 beginning permit year 3	4. Number of SCM inspections.
		5. Track number of low density inspections performed.	5. Continuously beginning permit year 3	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.

Table 20: Post Construction Site Runoff Control BMPs

Permit Ref.	3.6.2: Legal Authority Measures to maintain adequate legal authorities through ordinance or other regulatory mechanism to: (a) review designs and proposals for new development and redevelopment to determine whether adequate stormwater control measures will be installed, implemented, and maintained, (b) request information such as stormwater plans, inspection reports, monitoring results, and other information deemed necessary to evaluate compliance with the Post-Construction Stormwater Management Program, and (c) enter private property for the purpose of inspecting at reasonable times any facilities, equipment, practices, or operations related to stormwater discharges to determine whether there is compliance with the Post-Construction Stormwater Management Program.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
26.	This permit requirement is fully met by the existing post-construction program. See Table 19.			
Permit Ref.	3.6.3: Plan Review and Approval Measures to maintain plan review and approval authority, standards and procedures to: (a) Require Federal, State, and local government projects to comply with Post-Construction Program requirements throughout the entire MS4 permitted area, unless the entity is subject to its own NPDES MS4 permit or a qualifying alternative program, (b) Conduct site plan reviews of all new development and redeveloped sites that disturb greater than or equal to one acre, and sites that disturb less than one acre that are part of a larger common plan of development or sale for compliance with 15A NCAC 02H .1017 and the qualifying alternative programs that apply within your jurisdiction, (c) Ensure that each project has an Operation and Maintenance Agreement that complies with 15A NCAC 02H .1050(12), (d) Ensure that each project has an Operation and Maintenance Plan that complies with 15A NCAC 02H .1050(13), (e) Ensure that each project has recorded deed restrictions and protective covenants, that require the project to be maintained consistent with approved plans, and (f) Ensure that each SCM and associated maintenance accesses be protected in a permanent recorded easement per 15A NCAC 02H 1050 (9) and (10)			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
27.	This permit requirement is met by the existing post-construction program, see references in Table 19.			

Table 20: Post Construction Site Runoff Control BMPs

Table 20: Post Construction Site Runoff Control BMPs				
		5.	5.	5.
Permit Ref.	3.6.4: Inspections and Enforcement Measures to maintain inspection and enforcement authority, standards and procedures to: (a) Conduct post-construction inspections prior to issuing a Certificate of Occupancy or a Temporary Certificate of Occupancy. Alternatively, the project owner may provide a surety bond to guarantee compliance with the approved plan(s), (b) Ensure that the project has been constructed in accordance with the approved plan(s), (c) Ensure annual inspection of each permitted SCM to ensure compliance with the approved Operation and Maintenance Agreement, (d) Ensure inspection of low density projects at least once during the permit term, and (e) Require that inspections be conducted by a qualified professional.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
28.	This permit requirement is fully met by the existing post-construction program, see references provided in Table 19			
Permit Ref.	3.6.6: Fecal Coliform Reduction Measures to control, to the maximum extent practicable, sources of fecal coliform per 15A NCAC 02H .1017(7). At a minimum, the program shall include: (a) A pet waste management component, which may be achieved by revising an existing litter ordinance, and (b) An on-site domestic wastewater treatment system component, if applicable, which may be coordinated with local county health department, to ensure proper operation and maintenance of such systems.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
29.	Evaluate Pet Waste Ordinance			
	Improve ordinances related to fecal coliform reduction methods to align with the MS4 permit requirements.	1. Review existing pet waste ordinance	1. Year 1	1. yes/no/status
		2. Define gaps to address, if any.	2. Year 1	2. number of identified gaps

Table 20: Post Construction Site Runoff Control BMPs				
		3. Draft text amendment	3. Year 1	3. date completed
		4. Adoption by Board of Alderman	4. Year 1	4. date of adoption
29.	Septic Operations and Maintenance			
	Collaborate with Buncombe County Environmental Health staff to provide education to property owners with septic systems on site.	1. Post on thing on social related to septic maintenance	1. Year 1	1. yes/no/status
		2. Distribute brochure on septic maintenance to new construction that cannot connect to public sewer	2. Year 2	2. yes/no/status
		3. Post information about septic maintenance on stormwater website	3. Year 3	3. yes/no/status
		4. Train stormwater hotline staff to answer questions/direct calls related to septic concerns	4. Year 4	4. yes/no/status

PART 10: POLLUTION PREVENTION AND GOOD HOUSEKEEPING PROGRAMS

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

Select Accomplishments

- An inventory of best management practices was conducted across multiple departments. The findings were consolidated into the best management practices for the required categories.
- Improvements for gaps in or weaknesses of best management practice implementation were created and provided back to each department as needed.
- Formal spill response plan was created and implemented.
- Spill kits were provided to appropriate departments.

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

Table 21: Pollution Prevention and Good Housekeeping BMPs				
Permit Ref.	3.7.1: Municipal Facilities Operation and Maintenance Program Measures to manage facilities that are owned and operated by the permittee and have the potential for generating polluted stormwater runoff. The permittee shall maintain a current inventory of municipal facilities; perform facility inspections and routine maintenance; establish specific frequencies, schedules, and standard documentation; provide staff training on general stormwater awareness and implementing pollution prevention and good housekeeping practices.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
30.	Inventory of Town Facilities			

Table 21: Pollution Prevention and Good Housekeeping BMPs

	Inventory of town owned and operated facilities.	1. Create list of existing town-owned facilities	1. Year 1	1. Number of facilities inventories, date list is completed.
		2. Perform initial inspections of facilities with potential to generate polluted runoff or requiring spill response procedures. Classify facilities as having high or low potential for stormwater pollution	2. Permit Year 1	2. Number of inspections performed and number of facilities classified high/low potential.
		3. Determine which facilities require NPDES industrial permit/file NOI	3. Permit Year 1	3. date NOI submitted
		4. Determine which facilities require SPCC	4. Annually beginning permit year permit 2	4. Number of facilities added/removed resulting in an updated list
		5. Update inventory as needed which facilities are add/closed/modified	5. As needed	5. number of revisions made
31.	Facility Inspections			
	Inspect town facilities to confirm good housekeeping practices are being implemented, including vehicles and equipment and that Public Works and Fire Station 1 are in compliance with the industrial permits issued at a future date.	1. Established a SOP for town facility inspections, including a schedule, reporting documentation and tracking system.	1. Permit Year 1	1. yes/no/status
		2. Implement annual facility inspections for all town owned facilities	2. Annually conduct inspections, beginning permit year 2	2. number of inspections
32.	Staff Training – See BMP No. 34			
Permit Ref.	3.7.2: Spill Response Program Measures for facilities and operations that store and/or use materials that have the potential to contaminate stormwater runoff if spilled. The permittee shall maintain written spill response procedures and train staff on spill response procedures.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
33.	Spill Response Procedures in Place			
		1. Create list of facilities	1. Year 1	1. number and name of facilities

Table 21: Pollution Prevention and Good Housekeeping BMPs

BMP No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
	Maintain a spill response program for town facilities storing hazardous materials. Training appropriate staff.	2. Review spill procedures for applicable locations.	2. Year 1	2. Yes/no/status
		3. Train Staff	3. Annually beginning year 2	3. number of staff trained
		4. Replace/update spill kits	4. Annually beginning year 2	4. number of spill kits purchased
Permit Ref.	3.7.3: MS4 Operation and Maintenance Program Measures to minimize pollutants in the stormwater collection system. The permittee shall provide operation and maintenance staff training on stormwater awareness and pollution prevention, perform MS4 inspections, maintain the collection system including catch basins and conveyances; and establish specific frequencies, schedules, and standard documentation.			
BMP No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
34.	Staff Training			
	Develop a general stormwater education plan for pollution prevention and train town employees	1. Develop Training	1. Permit Year 1	1. yes/no status
		2. Train at least 20 employees	2. Permit Year 1	2. # of staff trained
		3. Integrate into annual staff training schedules.	3. Permit Year 1	3. # of staff trained.
35.	MS4 System Inspections and Maintenance			
	A proactive plan for MS4 system maintenance, requiring regular inspections and maintenance.	1. Develop a SOP that includes proactive inspection schedules, standard documentation, staff responsibilities, and proper maintenance training	1. Permit year 1	1. yes/no/status
		2. Perform regular inspections in accordance with the SOP	2. Following schedule established in SOP, once SOP and tracking system	2. number of inspections
		3. Verify, document, and prioritize maintenance activities identified by inspections or citizen reports	3. Continuously, as potential maintenance activities are identified	3. Number of maintenance activities performed
		4. Develop an inspection and maintenance tracking system to be used in accordance with the SOP and to identify "hot spot" locations for system maintenance	4. Permit year 2	4. yes/no/status

Table 21: Pollution Prevention and Good Housekeeping BMPs				
Permit Ref.	3.7.4: Municipal SCM Operation and Maintenance Program Measures to manage municipally-owned, operated, and/or maintained structural SCMs that are installed for compliance with the permittee's post-construction program. The permittee shall maintain a current inventory of SCMs, perform SCM inspections and maintenance, and shall establish specific frequencies, schedules, and documentation.			
BMP No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
36.	Inventory and Regular Inspection of Town owned SCMs			
	Inventory and inspection of municipally owned SCM's. Create additional inventory of SCMs operated by the town not associated with a post-construction permit and implement inspections and maintenance schedule.	1. Develop SCM inventory	1. Year 1	1. number of SCMs by type
		2. Perform annual SCM inspections	2. Annually, beginning permit year 1	2. number inspections completed
Permit Ref.	3.7.5: Pesticide, Herbicide and Fertilizer Management Program Measures to minimize water quality impacts from the use of landscape chemicals. The permittee shall provide routine pollution prevention and chemical use, storage and handling training, and shall ensure compliance with permits and applicator certifications.			
BMP No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
37.	Staff Certification Requirements			
	Staff hold appropriate certification: Right-of-Way Pest Control, Public Health Control, and Ornamental & Turf Pest Control applicator certifications for appropriate personnel	1. Review staff files to ensure that certifications and training requirements are current.	1. Annually, permit years 1-5	1. number of staff with certifications
38.	Provide SOP for Town Departments Related to Pesticides, Herbicides, Fertilizers			
	Standard operating procedures review and improvements	1. Create SOP	1. Year 1	1. Date created, number of staff trained
		2. Train admin staff on SOP	2. Year 1	2. number of staff trained
		3. Implement SOP	3. Continuously, beginning year 1	3. yes/no/status
Permit Ref.	3.7.6: Vehicle and Equipment Maintenance Program Measures to prevent and minimize contamination of stormwater runoff from areas used for municipal vehicle and equipment maintenance and/or cleaning. The permittee shall ensure that municipal industrial facilities subject to NPDES industrial permitting comply with those permit requirements, provide routine pollution prevention training to staff, perform routine inspections, and establish specific frequencies, schedules, and documentation.			
BMP No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
39.	NPDES Industrial Permit Compliance			

Table 21: Pollution Prevention and Good Housekeeping BMPs

	Ensure the NPDES industrial permit compliance occurs at all applicable town owned facilities.	1. Determine town sites which require industrial permit (BMP 30.B.3)	1. Permit Year 1	1. Number of facilities determined to require NPDES industrial permit
		2. File NOI for new industrial permits	2. Permit Year 1	2. Date filed
		3. Develop facility inspections form compliant with the permit	3. Permit Year 1	3. number of recommendations and updates provided
		4. Perform facility inspections for compliance with permit	4. Annually after permit is issued	4. number of inspections performed.
		5. Establish NPDES industrial permit tracking mechanism to document town owned facilities with inspection schedules and expiration dates of permits.	5. Permit Year 1	5. yes/no/status
40.	Vehicle and Equipment Cleaning and Maintenance Facility Inspections			
	Perform routine general facility inspections to ensure vehicle and equipment facilities are following proper procedures to minimize water quality impacts from washing.	1. Develop inspection checklist	1. Permit year 1	1. yes/no/status
		2. Perform inspections using checklist and notify site manager of any corrective actions needed.	2. Quarterly, beginning permit year 1.	2. Number of inspections
		3. Perform re-inspections of any facility that required corrective action.	3. As required by corrective actions needed.	3. Number of facilities requiring corrective actions, number of resolutions
Permit Ref.	3.7.7: Pavement Management Program Measures to reduce pollutants in stormwater runoff from municipally-owned streets, roads, and parking lots within the permittee's corporate limits. The permittee shall implement measures to control litter, leaves, debris, particulate and fluid pollutants associated with vehicles, and establish specific frequencies, schedules, and documentation.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
41.	Street Sweeping			
	Street sweeping following a regular schedule in order to reduce pollutants from city owned and maintained streets and public facilities, such as parks and parking lots.	1. Develop street sweeping SOP	1. Permit Year 1	1. Yes/no/status
		2. Implement SOP and documentation	2. Permit Year 1	2. Total number miles of swept

Table 21: Pollution Prevention and Good Housekeeping BMPs

42.	Leaf Collection			
	Periodic collection of leaves from residential and public areas to reduce pollutants and clogging of storm system inlets.	1. Develop leaf collection SOP	1. Permit Year 1	1. Yes/no/status
2. Implement SOP and documentation		2. Permit Year 1	2. Total volume of leaves collected (tons)	
43.	Vehicle spill clean up			
	An organized vehicle spill cleanup response to prevent pollutants from vehicular accidents from entertain the storm drain system.	1. Develop SOP specific to public safety response to accidents.	1. Permit Year 1	1. Yes/no/status
2. Provide public education about stopping vehicle leaks on stormwater website.		2. Permit Year 1	2. Date information is added to website.	
44.	Litter Management			
	Periodic collection and public education related to of 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	1. number of areas identified
		2. Post two times on social media about litter prevention	2. Annually, permit years 1-5	2. date of posts
		3. Organize a roadway clean up	3. Permit Year 3	3. date of clean up
4. Add at least five trash and recycling receptacles to high litter areas		4. Permit Years 4 and 5	4. number of trash cans added	