

**Revised Draft Stormwater Management Plan**  
**Town of Benson**  
**NCS000558**

April 19, 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 Benson 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 Benson 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 NCS000558, 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 Benson and located within the corporate limits of the Town of Benson.

In preparing this SWMP, the Town of Benson 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.

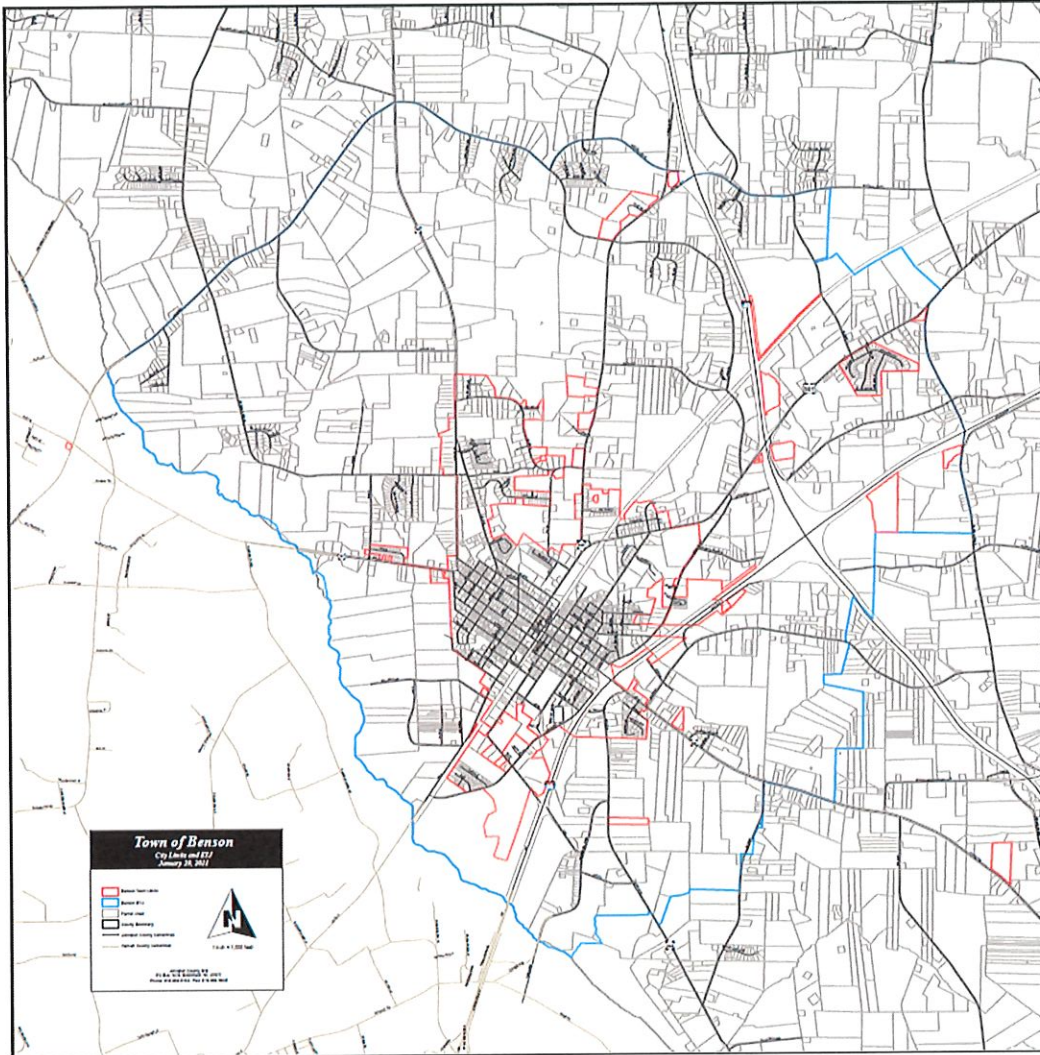
- I am a ranking elected official.
- I am a principal executive officer for the permitted MS4.
- I am a duly authorized representative for the permitted MS4 and have attached the authorization made in writing by a principal executive officer or ranking elected official which specifies me as (*check one*):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

Signature:	
Print Name:	Kimberly T Rickett
Title:	Town manager
Signed this 19 day of 2023 . April	

## PART 3: MS4 INFORMATION

### 3.1 Permitted MS4 Area

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



### 3.2 Existing MS4 Mapping

The current MS4 mapping contains pipes, ditches, catch basins, flow direction, and outfalls. The map was generated in 2015.

Table 1: Summary of MS4 Mapping

Percent of MS4 Area Mapped	100	%
No. of Major Outfalls* Mapped	9	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 Benson MS4 is located within the Neuse and Cape Fear River Basins 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
Driving Branch (Neuse RB)	27-52-6-1	C; NSW	No Data
Mingo Swamp (Cape Fear RB)	18-68-12-2	C; Sw	No Data
Hannah Creek (Neuse RB)	27-52-6	C; NSW	Benthos, Dissolved Oxygen (4mg/L, AL, FW)
East Mingo Swamp (Cape Fear RB)	18-68-12-2-1	C; Sw	No Data

### 3.4 MS4 Interconnection

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 Benson MS4 mapping does identify interconnections with the NCDOT MS4.
- d. The Town of Benson MS4 mapping does not include NCDOT MS4 outfalls.

### 3.5 Total Maximum Daily Loads (TMDLs)

The TMDL(s) listed in Table 3 below have been approved within the MS4 area, as determined by the map and list provided on the [NCDEQ Modeling & Assessment Unit web page](#). The table also indicates whether the approved



TMDL has a specific stormwater Waste Load Allocation (WLA) for any watershed directly receiving discharges from the permitted MS4, and whether a Water Quality Recovery Program has been implemented to address the WLA.

Table 3: Summary of Approved TMDLs

Water Body Name	TMDL Pollutant(s) of Concern	Stormwater Waste Load Allocation (Y/N)	Water Quality Recovery Program (Y/N)
Neuse River	Nitrogen	Y	N

### 3.6 Endangered and Threatened Species and Critical Habitat

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

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

Scientific Name	Common name	Species Group	Federal Listing Status
<i>Haliaeetus leucocephalus</i>	Bald Eagle	Vertebrate	BGPA
<i>Noturus furiosus</i>	Carolina Madtom	Vertebrate	ARS
<i>Necturus lewisi</i>	Neuse River Waterdog	Vertebrate	ARS
<i>Picoides borealis</i>	Red-cockaded Woodpecker	Vertebrate	E
<i>Fusconaia masoni</i>	Atlantic Pigtoe	Invertebrate	ARS
<i>Alasmidonta heterodon</i>	Dwarf Wedgemussel	Invertebrate	E
<i>Lasmigona subviridis</i>	Green Floater	Invertebrate	ARS
<i>Parvaspina steinstansana</i>	Tar River Spineymussel	Invertebrate	E
<i>Elliptio lanceolata</i>	Yellow Lance	Invertebrate	T
<i>Lindera subcoriacea</i>	Bog spicebush	Vascular	ARS
<i>Macbridea caroliniana</i>	Carolina Bogmint	Vascular	ARS
<i>Rhus michauxii</i>	Michaux's Sumac	Vascular	E

### 3.7 Industrial Facility Discharges

The Town of Benson 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
NCG210474	McIntosh Box and Pallet Co.-Benson
NCG170407	Chicopee, Inc.
NCG11062	Benson WWTP

### 3.8 Non-Stormwater Discharges

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

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 Benson 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	<b>Possible</b>
Flows from riparian habitats and wetlands	Incidental
Dechlorinated swimming pool discharges	Incidental
Street wash water	<b>Possible</b>
Flows from firefighting activities	Incidental

### 3.9 Target Pollutants and Sources

Based upon observations by Town staff and complaints from citizens, litter and yard waste has been identified as a stormwater pollutant.



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

The Town of Benson addresses litter and yard waste pollutants by reaching out to individual property owners that are not in compliance with Town Ordinances. The Town conducts a community litter sweep in April each year. Also, the Public Works Department operates a street sweeper and collects yard waste weekly.

The MOU with Johnston County targets sediment and nitrogen management through the new development requirements, with contractors, developers and engineers as targeted audiences. Homeowners are also a targeted audience for nutrients and general water quality through tracking built upon area during the building permit process. This education occurs by both the County and the Town.

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	Residents, Businesses, Schools	Public Education & Outreach
Yard Waste	Residents and Landscape Contractors	Outreach
Sediment	New development	Contractors, developers and engineers
Nitrogen	New development	Contractors, developers, engineers and homeowners

## PART 4: STORMWATER MANAGEMENT PROGRAM ADMINISTRATION

### 4.1 Organizational Structure

The Town of Benson’s organizational structure does not currently staff personnel solely dedicated to stormwater management. Under the oversight of the Director of Public Works and Utilities, staff members from different departments participate in assigned roles to meet the goals of the program. The Town of Benson also relies on Johnston County Public Utilities and Triangle J Council of Governments for some responsibilities associated with the program.

Table 8: Summary of Responsible Parties

SWMP Component	Responsible Position	Staff Name	Department
Stormwater Program Administration	Interim Town Manager	Kimberly Pickett	TOB Administration
SWMP Management	Interim Town Manager	Kimberly Pickett	TOB Administration
Public Education & Outreach	TJ-COG Stormwater Education and Outreach Coordinator	Hannah Barg	TJ-COG Planning Department
Public Involvement & Participation	Public Information Officer	Tyler Douglas	TOB Administration
Illicit Discharge Detection & Elimination	Utility Systems Manager	Ray Adams	TOB Public Works Department
Construction Site Runoff Control	Johnston County Stormwater Manager	Jessica Batten	Johnston County Utilities Department
	Director of Planning and Inspections	Erin Joseph	TOB Planning and Inspections Department
Post-Construction Stormwater Management	Johnston County Stormwater Manager	Jessica Batten	Johnston County Utilities Department
	Director of Planning and Inspections	Erin Joseph	TOB Planning and Inspections Department
Pollution Prevention/Good Housekeeping for Municipal Operations	Public Works Superintendent	Jeremy Bryant	TOB Public Works Department
Municipal Facilities Operation & Maintenance Program	Public Works Superintendent	Jeremy Bryant	TOB Public Works Department
Spill Response Program	Fire Chief	Alan Johnson	TOB Fire Department

MS4 Operation & Maintenance Program	Public Works Superintendent	Jeremy Bryant	TOB Public Works Department
Municipal SCM Operation & Maintenance Program	Utility Systems Manager	Ray Adams	TOB Public Works Department
Pesticide, Herbicide & Fertilizer Management Program	Interim Town Manager	Kimberly Pickett	TOB Administration
Vehicle & Equipment Cleaning Program	Public Works Superintendent	Jeremy Bryant	TOB Public Works Department
Pavement Management Program	Public Works Superintendent	Jeremy Bryant	TOB Public Works Department
Total Maximum Daily Load (TMDL) Requirements	Utility Systems Manager	Ray Adams	TOB Public Works Department

#### 4.2 Program Funding and Budget

In accordance with the issued permit, the Town of Benson 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 Town of Benson implemented a Stormwater Fee in Fiscal Year 2020-2021. A charge of \$2.50 per month is assessed on each utility bill. This fee generates \$52,050 per year.

#### 4.3 Shared Responsibility

The Town of Benson 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 Benson 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 Benson 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 Sections E & F	Johnston County Public Utilities	Y
Permit Section B	Triangle J Council of Governments	Y



#### 4.4 Co-Permittees

The are no other entities applying for co-permittee status under the NPDES MS4 permit number NCS000558 for the Town of Benson. 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 Benson will manage and report the following Best Management Practices (BMPs) for the administration of the Stormwater Management Program.

Table 11: Program Implementation BMPs				
<b>Permit Ref.</b>	<b>2.1.1 Program Implementation</b> The permittee shall maintain adequate funding and staffing to implement and manage the provisions of the SWMP and meet all requirements of this permit.			
<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
1.	<b>Analyze funding</b>			
	Conduct an analysis of the stormwater program funding to document adequate funding.	1. Analysis conducted	1. Permit year 1	1. Yes/No
<b>Permit Ref.</b>	<b>2.2.2 Program Implementation</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.			
<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
2.	<b>Written program</b>			
	Develop written policies and procedures for stormwater program implementation.	1. Written program documents prepared	1. Permit year 1	1. Yes/No
		2. Review written program documents to determine if revisions are needed.	1. Annually, beginning in Permit year 2	1. Yes/No
		3. Revise written documents	1. Annually, beginning in Permit year 2	1. Yes/No

**Table 12: Program Administration BMPs**

Permit Ref.	<b>2.1.2 Program Implementation</b>			
	Measures to evaluate the performance and effectiveness of the SWMP program components at least annually. Results shall be used by the permittee to modify the program components as necessary to accomplish the intent of the Stormwater Program.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
3.	<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
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
4.	<b>Permit Renewal Application</b>			
	Submit a permit renewal application and Draft SWMP no later than 180 prior to permit expiration.	1. Draft SWMP applicable to the proceeding 5 years following permit re-issuance.	1. Permit Year 5	1. Yes/No
		2. Certify the stormwater permit renewal application (Permit renewal application form and Draft SWMP for the next 5-year permit cycle) and submit to NCDEQ at least 180 days prior to permit expiration.	1. Permit Year 5	1. Date of permit renewal application submittal



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

The Town of Benson 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 13 below. In addition, the Town of Benson is required to inform businesses and the general public of the hazards associated with illicit discharges, illegal dumping and improper disposal of waste.

Table 13: Summary of Target Pollutants & Audiences

Target Pollutants/Sources	Target Audience(s)
Sediment	Development community
Illicit Discharges	General Public, Businesses, Municipal Employees
Illegal Dumping	General Public, Businesses, Municipal Employees
Improper Disposal of Waste	General Public, Businesses, Municipal Employees

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

Table 14: Public Education and Outreach BMPs				
Permit Ref.	<b>3.2.2 and 3.2.4: Outreach to Targeted Audiences</b> Measures to identify the specific elements and implementation of a Public Education and Outreach Program to share educational materials to the community or conduct equivalent outreach activities about the impacts of stormwater discharges on water bodies and how the public can reduce pollutants in stormwater runoff. The permittee shall provide educational information to identified target audiences on pollutants/sources identified in table 12 above, and shall document the extent of exposure of each media, event or activity, including those elements implemented locally or through a cooperative agreement.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
5.	<b>Social Media Campaign</b>			
	Provide at least 2 social media posts annually, targeting personal pollution prevention.	Reach general public through social media	Twice annually	Yes/No
6.	<b>Clean Water Education Partnership participation</b>			
	Continue supporting CWEP through contribution	1. Support CWEP financially	1. Annually	1. Yes/No
		2. Evaluate the agreement to determine if CWEP is continuing to meet the Town's educational needs.	1. Annually	1. Yes/No
Permit Ref.	<b>2.1.7, 3.2.3 and 3.6.5(c): Web Site</b> Measures to provide a web site designed to convey the program's message(s) and provide online materials including ordinances, or other regulatory mechanisms, or a list identifying the ordinances or other regulatory mechanisms, providing the legal authority necessary to implement and enforce the requirements of the permit and SWMP. The web page shall also provide developers with all relevant post-construction requirements, design standards, checklists and/or other materials.			

**Table 14: Public Education and Outreach BMPs**

BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
7.	<b>Stormwater website</b>			
	The Town has a website dedicated to stormwater information as required by permit. This page will be expanded with requirements for the development community and meet requirements of section 2.1.7 of the permit.	1. Maintain and update website	1. Ongoing	1. Yes/No
<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.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
8.	<b>Stormwater complaints – phone based</b>			
	Maintain a complaint number for the general public.	1. Develop simple SOP for staff answering phones.	1. Permit Year 1	Yes/No
		2. Advertise complaint number on website	1. Ongoing	1. Yes/No
9.	<b>Stormwater complaints – web based</b>			
	Maintain a web-based complaint submittal process for the general public and advertise it on the website.	1. Continue implementing the GoGov complaint submittal program.	1. Ongoing	1. Yes/No
		2. Advertise the GoGov system on the Town’s website.	1. Ongoing	1. Yes/No



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

<b>Table 15: 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>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
<b>10.</b>	<b>Stormwater program input</b>			
	Conduct a public hearing on ordinance changes	1. Hold public hearing on ordinance changes	1. As needed	1. Yes/No
<b>11.</b>	<b>SWMP input</b>			
	Conduct a public meeting during the Bord of Commissioner’s meeting on the SWMP annual report.	1. Hold public meeting on annual report	1. Annually starting in Permit year 1	1. Yes/No
<b>12.</b>	<b>Social media presence</b>			
	Utilize social media to allow feedback from residents.	1. Post at least one opportunity for public involvement annually in the Town’s stormwater program on social media.	1. Annually starting in Permit Year 1	1. Yes/No
<b>13.</b>	<b>Advertise input opportunities</b>			
	Advertise community stormwater input opportunities.	1. Advertise at least one community involvement opportunity on the Town’s website annually.	1. Annually starting in permit year 1.	1. Yes/No
<b>Permit Ref.</b>	<b>3.3.2: Volunteer Opportunities</b> Measures to provide volunteer opportunities designed to promote ongoing citizen participation.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
<b>14.</b>	<b>Spring cleanup</b>			
	Continue the annual Town Spring Cleanup event, that focuses heavily on litter sweeps.	1. Hold event annually	1. Annually	1. Yes/No 2. Number of bags of litter collected.

## PART 7: ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM

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

Table 16: Illicit Discharge Detection and Elimination BMPs				
<b>Permit Ref.</b>	<b>3.4.1: MS4 Map</b> Measures to develop, update and maintain a municipal storm sewer system map including stormwater conveyances, flow direction, major outfalls and waters of the United States receiving stormwater discharges.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
15.	<b>MS4 Map</b>			
	The Town will keep the stormwater system map updated.	1. Revise map as new outfalls and system components are identified.	1. Continuously	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>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>
16.	<b>Ordinance</b>			
	The Town will develop an ordinance prohibiting illicit discharges and review annually.	1. Develop ordinance	1. Permit year 1	1. Yes/No
		2. Review and update the ordinance as needed	1. Permit years 2-5	1. Yes/No
<b>Permit Ref.</b>	<b>3.4.3: IDDE Plan</b> Measures to maintain and implement a written IDDE Plan to detect and address illicit discharges, illegal dumping and any non-stormwater discharges identified as significant contributors of pollutants to the MS4. The plan shall provide standard procedures and documentation to:  <ul style="list-style-type: none"> <li>a) Locate priority areas likely to have illicit discharges,</li> <li>b) Conduct routine dry weather outfall inspections,</li> <li>c) Identify illicit discharges and trace sources,</li> <li>d) Eliminate the source(s) of an illicit discharge, and</li> <li>e) Evaluate and assess the IDDE Program.</li> </ul>			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>



**Table 16: Illicit Discharge Detection and Elimination BMPs**

Table 16: Illicit Discharge Detection and Elimination BMPs				
17.	<b>IDDE SOP</b>			
	Develop written IDDE standard operating procedures (SOP)	1. Develop the IDDE SOP	1. Permit year 1	1. Yes/No
		2. Review and update the SOP as necessary	1. Permit years 2-5	1. 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>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>
18.	<b>Remove illicit discharges</b>			
	A. Screen all known outfalls for illicit discharges at least once per permit cycle.	1. Visually screen all known outfalls.	1. Permit years 1-5, all outfalls screened at least once per permit cycle	1. Yes/No
	B. Investigate complaints received from the public regarding illicit discharges	1. Investigate complaints	1. Permit year 1-5	1. Number of complaints received. 2. Number of investigations.
	C. Identify the source of identified illicit discharges	1. Track illicit discharges to source, if possible	1. Permit year 1-5	1. Number of investigations
	D. Take enforcement action where illicit discharges are identified and source is known.	1. Take enforcement actions to remove illicit discharges.	1. Permit year 1-5	1. Number of enforcement actions
<b>Permit Ref.</b>	<b>3.4.5: Staff IDDE Training</b> Measures to provide training for municipal staff and contractors who, as part of their normal job responsibilities, may observe an illicit discharge, illicit connection, illegal dumping or spills. Training shall include how to identify and report illicit discharges, illicit connections, illegal dumping and spills. Each staff training event shall be documented, including the agenda/materials, date, and number of staff participating.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
19.	<b>IDDE training for staff</b>			
	Provide training  <i>Two levels of training will be provided:</i> 1. <i>General illicit discharge identification for all municipal staff, describing Town contacts.</i> 2. <i>Training for field staff tasked with routine outfall screening and removal of illicit discharges.</i>	1. Train field staff on SOP	1. Permit year 2	1. Yes/No 2. Number of staff trained
		2. Train all staff on illicit discharges	1. Annually, starting in permit year 2	1. Yes/No 2. Number of staff trained



**Table 16: Illicit Discharge Detection and Elimination BMPs**

Permit Ref.	<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.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
20.	<b>Train Utility office staff</b>			
	Establish protocol for staff to take calls and direct to the appropriate personnel	1. Written protocol established	1. Permit year 2	1. Yes/No
		2. Protocol reviewed and revised as necessary	2. Permit years 3-5	2. Yes/No
21.	<b>Social Media</b>			
	Utilize social media to educate general public about illicit discharge identification	1. At least one social media post annually	1. Permit years 2-5	1. Yes/No
22.	<b>Spill notification by Police and Fire Departments</b>			
	Departments that respond to wrecks and spills will notify PW staff to respond if needed and maintain record	1. Public Works staff notified	1. Ongoing	1. Yes/No

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

In accordance with 15A NCAC 02H .0153, the Town of Benson relies upon the North Carolina Sedimentation Pollution Control Act (SPCA) of 1973 as a qualifying alternative program to meet a portion of the NPDES MS4 Permit requirements for construction site runoff control measures. The SPCA requirements include reducing pollutants in stormwater runoff from construction activities that result in land disturbance of greater than or equal to one acre, and includes any construction activity that is part of a larger common plan of development that would disturb one acre or more. The state SPCA Program is either delegated to a city/town, delegated to a county, or implemented by NCDEQ in non-delegated areas. The Town of Benson maintains a Memorandum of Understanding with Johnston County – a delegated local program – to fulfill plans review and inspections for this minimum control.

Table 17: 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	Johnston County Delegated SPCA Program*	15A NCAC Chapter 04, NCDEQ Approved Delegation, Interlocal Agreement/Joint Resolution, Local Ordinance	Johnston County

\* The local delegated SPCA Program ordinance(s)/regulatory mechanism(s) can be found at: [https://www.johnstonnc.com/ut2/content.cfm?page\\_desc=esc](https://www.johnstonnc.com/ut2/content.cfm?page_desc=esc).

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

Table 18: Construction Site Runoff Control BMPs				
<b>Permit Ref.</b>	<b>3.5.6: Public Input</b> Measures to provide and promote a means for the public to notify the appropriate authorities of observed erosion and sedimentation problems.			
<b>BMP No.</b>	<b>A</b> Description of BMP	<b>B</b> Measurable Goal(s)	<b>C</b> Schedule for Implementation	<b>D</b> Annual Reporting Metric
23.	<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. Develop written protocol	1. Permit year 1	1. Yes/No
2. Train staff		2. Annually, permit years 1-5	2. Yes/No	
24.	<b>Educate Public</b>			
	Utilize the Town’s social media to educate the public about construction site runoff	1. At least one post on construction site runoff	1. Annually, permit years 2-5	1. Yes/No
<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>A</b>	<b>B</b>	<b>C</b>	<b>D</b>

**Table 18: Construction Site Runoff Control BMPs**

BMP No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
25.	<b>Unified Development Ordinance</b>			
	Inspection staff will utilize the UDO to enforce construction site waste control	1. Enforce UDO requirements for waste control	1. Ongoing	1. Yes/No
		2. Review/revise UDO requirements as necessary	2. Permit years 1-5, annually	2. Yes/No



**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 Benson 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 Benson 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 19: Qualifying Alternative Program(s) for Post-Construction Site Runoff Control Program

State QAP Name	State Requirements	Local Ordinance / Regulatory Mechanism Reference
Neuse River Basin Nutrient Sensitive (NSW) Management Strategy	15A NCAC 2B .0235	<a href="https://www.johnstonnc.com/ut2/content.cfm?page_desc=stormwater">https://www.johnstonnc.com/ut2/content.cfm?page_desc=stormwater</a>

Table 20: 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	UDO Title XV 156.101	2015
3.6.3(a) & 15A NCAC 02H.0153(c) Federal, State & Local Projects	Johnston County Stormwater Ordinance via Agreement	2021
3.6.3(b) Plan Review	Johnston County Stormwater Ordinance via Agreement	2021
3.6.3(c) O&M Agreement	Johnston County Stormwater Ordinance via Agreement	2021
3.6.3(d) O&M Plan	Johnston County Stormwater Ordinance via Agreement	2021
3.6.3(e) Deed Restrictions/Covenants	Johnston County Stormwater Ordinance via Agreement	2021
3.6.3(f) Access Easements	Johnston County Stormwater Ordinance via Agreement	2021
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	Johnston County Stormwater Ordinance via Agreement	2021
3.6.2(c) Right of Entry	Johnston County Stormwater Ordinance via Agreement	2021
3.6.4(a) Pre-CO Inspections	Johnston County Stormwater Ordinance via Agreement	2021
3.6.4(b) Compliance with Plans	Johnston County Stormwater Ordinance via Agreement	2021
3.6.4(c) Annual SCM Inspections	Johnston County Stormwater Ordinance via Agreement	2021
3.6.4(d) Low Density Inspections	Johnston County Stormwater Ordinance via Agreement	2021
3.6.4(e) Qualified Professional	Johnston County Stormwater Ordinance via Agreement	2021
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	None	
3.6.6(b) On-Site Domestic Wastewater Treatment	Codified Ordinance 52.021	1969

The annual reporting metrics for the post construction program are provided in Table 21: Post Construction Site Runoff Control BMPs below.

<b>Table 21: Post Construction Site Runoff Control BMPs</b>			
<b>Permit Ref.</b>	<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.		
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>
			<b>D</b> <b>Annual Reporting Metric</b>



**Table 21: Post Construction Site Runoff Control BMPs**

26.	<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 16 and 18.	1. Track number of low density and high density plan reviews performed.	1. Continuously Permit Years 1-5	1. Number of plan reviews performed for low density and high density.
		2. Track number of low density and high density plans approved.	1. Continuously Permit Years 1-5	1. 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.	1. Continuously Permit Years 1-5	1. 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.	1. Continuously Permit Years 1-5	1. Number of SCM inspections.
		5. Track number of low density inspections performed.	1. Continuously Permit Years 1-5	1. Number of low density projects inspected.
		6. Track number and type of enforcement actions taken.	1. Continuously Permit Years 1-5	1. Number of enforcement actions issued.
<b>Permit Ref.</b>	<b>2.3 and 3.6: Qualifying Alternative Program(s)</b> Measures to develop, implement and enforce additional BMPs in order to comply with the QAP state program requirements.			
<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>
The QAP requirements are fully met by the existing QAP for post-construction, see references provided in Table 10.				
<b>Permit Ref.</b>	<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.			
<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>
27.	<b>Stormwater Ordinance to reflect requirements of Johnston County Ordinance</b>			
	Revise UDO to more clearly require stormwater plans in compliance with the Phase 2 permit.	1. Revise ordinance	1. Permit year 1	1. Yes/No
2. Review and revise ordinance as necessary		1. Permit years 2-5	1. Yes/No	



**Table 21: Post Construction Site Runoff Control BMPs**

<b>Permit Ref.</b>	<b>3.6.3: Plan Review and Approval</b> Measures to maintain plan review and approval authority, standards and procedures to: (a) Require Federal, State, and local government projects to comply with Post-Construction Program requirements throughout the entire MS4 permitted area, unless the entity is subject to its own NPDES MS4 permit or a qualifying alternative program, (b) Conduct site plan reviews of all new development and redeveloped sites that disturb greater than or equal to one acre, and sites that disturb less than one acre that are part of a larger common plan of development or sale for compliance with 15A NCAC 02H .1017 and the qualifying alternative programs that apply within your jurisdiction, (c) Ensure that each project has an Operation and Maintenance Agreement that complies with 15A NCAC 02H .1050(12), (d) Ensure that each project has an Operation and Maintenance Plan that complies with 15A NCAC 02H .1050(13), (e) Ensure that each project has recorded deed restrictions and protective covenants, that require the project to be maintained consistent with approved plans, and (f) Ensure that each SCM and associated maintenance accesses be protected in a permanent recorded easement per 15A NCAC 02H 1050 (9) and (10).			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
	This permit requirement is fully met by the existing post-construction program, see references provided in Table 20			
<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>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>
	This permit requirement is fully met by the existing post-construction program, see references provided in Table 20			
<b>Permit Ref.</b>	<b>3.6.6: Fecal Coliform Reduction</b> Measures to control, to the maximum extent practicable, sources of fecal coliform per 15A NCAC 02H .1017(7). At a minimum, the program shall include: (a) A pet waste management component, which may be achieved by revising an existing litter ordinance, and (b) An on-site domestic wastewater treatment system component, if applicable, which may be coordinated with local county health department, to ensure proper operation and maintenance of such systems.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
28.	<b>Pet waste stations</b>			
	Maintain pet waste stations at dog park	1. Maintain waste stations as needed	1. Ongoing, permit years 1-5	1. Yes/No



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

This SWMP provides a comprehensive pollution prevention and good housekeeping strategy for the Town of Benson municipal facilities and operations. Pollution prevention and good housekeeping is accomplished through the implementation of seven required programs, which collectively address the ultimate goal of preventing or reducing pollutant runoff from municipal operations such as parks and open space maintenance, fleet and building maintenance, new construction and land disturbances, and municipal storm sewer system maintenance.

Pollution prevention and good housekeeping for municipal operations includes the following programs:

1. Municipal Facilities Operation and Maintenance Program
2. Spill Response Program
3. MS4 Operation and Maintenance Program
4. Municipal SCM Operation and Maintenance Program
5. Pesticide, Herbicide and Fertilizer Management Program
6. Vehicle and Equipment Maintenance Program
7. Pavement Management Program

The Town of Benson will manage, implement and report the pollution prevention and good housekeeping BMPs as specified in Table 22 below for each required program.

<b>Table 22: 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>29.</b>	<b>Facility inventory</b>			
	Develop list of all sites and discharge locations for inspection	1. Identify all Town facilities	1. Permit year 1	1. Yes/No
		2. Review/revise inventory as necessary	1. Annually, permit years 2-5	1. Yes/No
		3. Identify facilities that have no pollution potential.	1. Permit year 1	1. Yes/No
<b>30.</b>	<b>Inspect facilities</b>			
	Inspect facilities	1. Facilities that have no pollution potential to be inspected once per permit cycle.	1. Once per permit cycle	1. Yes/No 2. Number of inspections completed
		2. Facilities that have pollution potential inspected annually.	1. Annually, permit years 1-5	1. Yes/No

**Table 22: Pollution Prevention and Good Housekeeping BMPs**

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
31.	<b>Spill kits</b>			
	Provide spill kits for facilities where pollution potential exists	1. Spill kit provided	1. Permit years 1-5	1. Yes/No
32.	<b>Spill response plan</b>			
	Develop written procedures for spills for the Public Works Facility	1. Procedure developed.	1. Permit year 1	1. Yes/No
		2. Staff trained	1. Permit years 1-5	1. Yes/No
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	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
33.	<b>Catch basin maintenance</b>			
	Maintain catch basins	1. Continue maintaining catch basins	1. Ongoing	1. Yes/No
Permit Ref.	3.7.4: Municipal SCM Operation and Maintenance Program Measures to manage municipally-owned, operated, and/or maintained structural stormwater control measures (SCMs) that are installed for compliance with the permittee's post-construction program. The permittee shall maintain a current inventory of SCMs, perform SCM inspections and maintenance, and shall establish specific frequencies, schedules, and documentation.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
34.	<b>Town owned SCMs</b>			
	Inspect and perform maintenance on Town owned SCMs.	1. Develop O&M plans for any town-owned SCM	1. Annually	1. Yes/No
		2. Inspect Town-owned SCMs	1. Annually, permit years 1-5	1. Yes/No 2. Number of inspections performed
		3. Maintain SCM as needed	1. Ongoing	1. Yes/No
35.	<b>Privately owned SCMs</b>			
	Maintain an inventory of privately owned SCMs	1. Revise/update inventory	1. Ongoing	1. Yes/No



**Table 22: Pollution Prevention and Good Housekeeping BMPs**

		2. Require annual inspections	1. Annually, permit years 2-5	1. Yes/No
		3. Require maintenance be completed, where needed	1. Ongoing	1. Yes/No
<b>Permit Ref.</b>	<b>3.7.5: Pesticide, Herbicide and Fertilizer Management Program</b> Measures to minimize water quality impacts from the use of landscape chemicals. The permittee shall provide routine pollution prevention and chemical use, storage and handling training, and shall ensure compliance with permits and applicator certifications.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
<b>36.</b>	<b>Licensed pesticide applicators</b>			
	Continue to require a licensed pesticide applicator apply all herbicides	1. Continue requiring pesticide applicator applying herbicides	1. Ongoing	1. Y/N
<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>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>37.</b>	<b>Washbay oil/water separator</b>			
	Maintain Washbay for washing equipment	1. Wash equipment in the wash bay	1. Ongoing	1. Y/N
	<i>In early 2022, the Town completed the construction of a new Public Works Facility, retiring the old facility. The new facility has a wash bay with an oil/water separator and better pollution prevention controls built into the facility.</i>	2. Inspect oil-water separator	1. Permit years 1-5, annually	1. Y/N
		3. Maintain oil-water separator	1. Ongoing	1. Y/N
<b>38.</b>	<b>Street Sweeper Debris Management</b>			
	Street sweeper debris is stored in dumpster and disposed by waste collection contractor.	1. Waste stored in dumpster	1. Ongoing	1. Y/N
<b>Permit Ref.</b>	<b>3.7.7: Pavement Management Program</b> Measures to reduce pollutants in stormwater runoff from municipally-owned streets, roads, and parking lots within the permittee’s corporate limits. The permittee shall implement measures to control litter, leaves, debris, particulate and fluid pollutants associated with vehicles, and establish specific frequencies, schedules, and documentation.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>

**Table 22: Pollution Prevention and Good Housekeeping BMPs**

39.	<b>Street Sweeping</b>			
	Sweep streets routinely.	1. Sweep downtown streets at least monthly.	1. Ongoing	1. Sweeping records
40.	<b>Yard waste</b>			
	<p>Collect and properly handle yard waste.</p> <p><i>Yard waste is collected weekly and processed in the Town-owned Yard Waste Facility permitted by NCDEQ. Processed material is provided to Town residents and landscape contractors for use as mulch or compost.</i></p>	1. Yard waste collected at least monthly	1. Ongoing	1. Annual collection totals (cubic yards)