

Draft Stormwater Management Plan
City of Lexington
NCS000584

March 9, 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 City of Lexington 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 City of Lexington 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 NCS000584, as issued by NCDEQ. This permit covers activities associated with the discharge of stormwater from the MS4 as owned and operated by the City of Lexington and located within the corporate limits of the City of Lexington.

In preparing this SWMP, the City of Lexington 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.

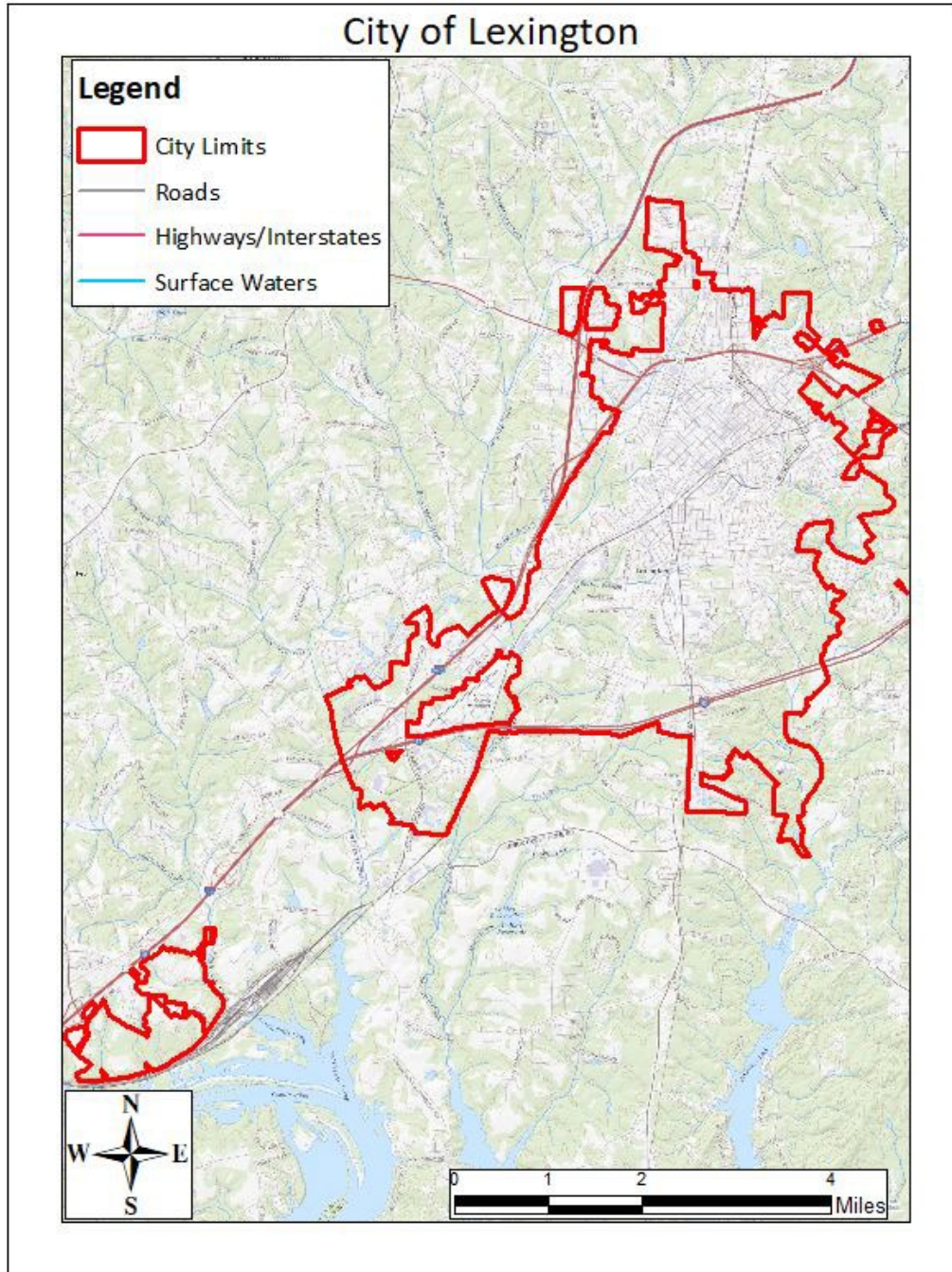
- I am a ranking elected official.
- I am a principal executive officer for the permitted MS4.
- I am a duly authorized representative for the permitted MS4 and have attached the authorization made in writing by a principal executive officer or ranking elected official which specifies me as (*check one*):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

<i>Signature:</i>	
<i>Print Name:</i>	Zack MacKenzie
<i>Title:</i>	Stormwater Administrator
Signed this 9 th day of March, 2023 .	

PART 3: MS4 INFORMATION

3.1 Permitted MS4 Area

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



3.2 Existing MS4 Mapping

The current MS4 mapping includes features such as storm drains, stormwater pipes (with flow direction), culverts, manholes, junction structures, outfalls, channel lines, and streams. When known, attributes such as material, size, elevation, ownership, etc., are included in the features' attribute tables. The entire MS4 area has not been mapped, however, a grid system is currently being used to identify and inventory the missing areas. An MS4 GIS map is available to the public on ArcGIS Online. The direct link to this map is <https://www.arcgis.com/apps/webappviewer/index.html?id=e1b3340c280a4efd9bb7cf7d8d53c76f>. There is also a stormwater database for internal use in ArcGIS.

Table 1: Summary of Current MS4 Mapping

Percent of MS4 Area Mapped	70	%
No. of Major Outfalls* Mapped	137**	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.*

***For the outfalls that have been mapped, the classification as a Major Outfall has not been used. However, there are 137 known outfalls with a pipe diameter of at least 36 inches.*

3.3 Receiving Waters

The City of Lexington MS4 is located within the Yadkin Pee-Dee 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
Abbotts Creek	12-119-(6)b	C	Benthos (Nar, AL, FW)
Abbotts Creek	12-118.5	WS-V, B	PCB Fish Tissue Advisory (Advisory, FC, NC), Chlorophyll a (40 µg/l, AL, NC), Turbidity (25 NTU AL, FW acres & SW)
North Potts Creek (Michael Branch)	12-113-3	C	NA
Rat Spring Branch	12-113-5	C	NA
South Potts Creek (First Potts Creek)	12-111	C	Fish Tissue Mercury (Nar, FC, NC)
Swearing Creek	12-113	C	Fish Community (Nar, AL, FW)
Tar Creek	12-113-6	C	NA
Yadkin River	12-(108.5)b1	WS-V	NA
Yadkin River	12-(108.5)b2	WS-V	PCB Fish Tissue Advisory (Advisory, FC, NC), Chlorophyll a (40 µg/l, AL, NC)

3.4 MS4 Interconnection

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

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

- a. The interconnection is receiving stormwater from NCDOT MS4. The number of interconnections is unknown. Quantity: N/A
- b. The interconnection is discharging stormwater from NCDOT MS4. The number of interconnections is unknown. Quantity: N/A
- c. The City of Lexington MS4 mapping does identify interconnections with the NCDOT MS4.
- d. The City of Lexington MS4 mapping does 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)
NA	NA	NA	NA

No TMDLs have been approved for the MS4 receiving waters. The City of Lexington will continue to monitor changes in the TMDL reports and 303(d) listed parameters of interest.

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>Myotis septentrionalis</i>	Northern Long-eared bat	Vertebrate	T
<i>Helianthus schweinitzii</i>	Schweinitz's Sunflower	Vascular Plant	E

BGPA – Bald and Golden Eagle Protection Act

E – Endangered

T – Threatened

3.7 Industrial Facility Discharges

The City of Lexington 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
NCG020204	Hanson Aggregates - Lexington Quarry
NCG030190	CPM Wolverine Proctor
NCG050458	Westrock/MPS
NCG070046	Johnson Concrete Inc.
NCG081000	Isgett Distributors Inc
NCG110093	Lexington Regional WWTP
NCG140057	Black Concrete Incorporated
NCG160205	Woodside Asphalt Plant
NCG170354	Parkdale Mills Inc - Plant 3
NCG180257	MasterBrand Cabinets, Inc.
NCG210434	Kepley-Frank Hardwood Company, Inc
NCG210435	Valendrawers, Inc.
NCGNE0083	Lexington facility – Halyard North Carolina LLC
NCGNE0197	The North Carolina Moulding Company
NCGNE0421	Carter Millwork, Inc.
NCGNE0567	RWBT, Inc. dba Southeast Fleet Services
NCGNE0588	Linwood Hospitality LLC
NCGNE0645	Smurfit-Stone Container Corp-Davidson
NCGNE0647	Tubular Textile Machinery, Inc
NCGNE0801	Lexington Furniture Industries
NCGNE0807	Gainsborough Baths LLC
NCGNE0837	Trinity Transport
NCGNE0890	Porter's Fabrications-lexington facility
NCGNE1282	Save-A-Lot Distribution Center

3.8 Non-Stormwater Discharges

The water quality impacts of non-stormwater discharges have been evaluated by the City of Lexington as summarized in Table 6 below. The unpermitted non-stormwater flows listed as incidental do not significantly impact water quality. The City of Lexington has evaluated residential and charity car washing for possible significant water quality impacts. Street cleaning is performed with a dry street sweeping process so street washing discharges are not relevant to the MS4.

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

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 City of Lexington to determine whether they may significantly impact water quality. They were determined to be a possible cause of water quality impacts and will be addressed through public education efforts (See BMP Nos. 8 and 9).

Table 6: Non-Stormwater Discharges

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

3.9 Target Pollutants and Sources

In addition to those target pollutants identified above, the City of Lexington is not aware of other significant water quality issues within the permitted MS4 area.

Table 7 below summarizes the water quality pollutants identified throughout Part 3 of this SWMP, the likely activities/sources/targeted audiences attributed to each pollutant, and identifies the associated SWMP programs that address each. In addition, the City of Lexington has evaluated schools, homeowners and businesses as target audiences that are likely to have significant stormwater impacts. Residents, businesses, schools, and municipal staff have been evaluated as likely sources and target audiences for the pollutants mentioned below because of the possibility that proper best management practices are not being followed to prevent potential pollution. Schools are also an important target audience because of the opportunity to educate students about stormwater pollution prevention.

Table 7: Summary of Target Pollutants and Sources

Target Pollutants	Likely Sources/Target Audiences	SWMP Program Addressing Target Pollutants/Audiences
Litter	Residents, businesses, schools	Public Education & Outreach, Public Involvement & Participation
Yard Waste	Residents, businesses, schools	Public Education & Outreach, Public Involvement & Participation
Nutrients	Fertilization, sewer overflows, failing septic systems	Public Education & Outreach, Illicit Discharge Detection & Elimination, Construction Site Runoff Control, Post-Construction Site Runoff Control, Pollution Prevention & Good Housekeeping
Sediment	Construction	Construction Site Runoff Control
Fecal Coliform	Sewer overflows, failing septic systems, pet and wildlife waste, illicit discharges	Public Education & Outreach, Illicit Discharge Detection & Elimination
Fats, Oils, & Grease	Residents, businesses, schools	Public Education & Outreach, Illicit Discharge Detection & Elimination
Illicit Discharges	Residents, businesses, schools, municipal staff	Public Education & Outreach, Illicit Discharge Detection & Elimination, Pollution Prevention & Good Housekeeping
Illegal Dumping	Residents, businesses, schools, municipal staff	Public Education & Outreach, Illicit Discharge Detection & Elimination, Pollution Prevention & Good Housekeeping
Improper Disposal of Waste	Residents, businesses, schools, municipal staff	Public Education & Outreach, Illicit Discharge Detection & Elimination, Pollution Prevention & Good Housekeeping
General non-point sources pollution	Residents, businesses, schools, municipal staff	Public Education & Outreach

PART 4: STORMWATER MANAGEMENT PROGRAM ADMINISTRATION

4.1 Organizational Structure

The City of Lexington stormwater management program is implemented by Stormwater Services in the Public Services Department. Stormwater Services is responsible for Public Education & Outreach, Public Involvement & Participation, Illicit Discharge Detection & Elimination, Post-Construction Site Runoff Control, and Pollution Prevention & Good Housekeeping for Municipal Operations. Construction Site Runoff Control is delegated to the NCDEQ Winston-Salem Regional Office.

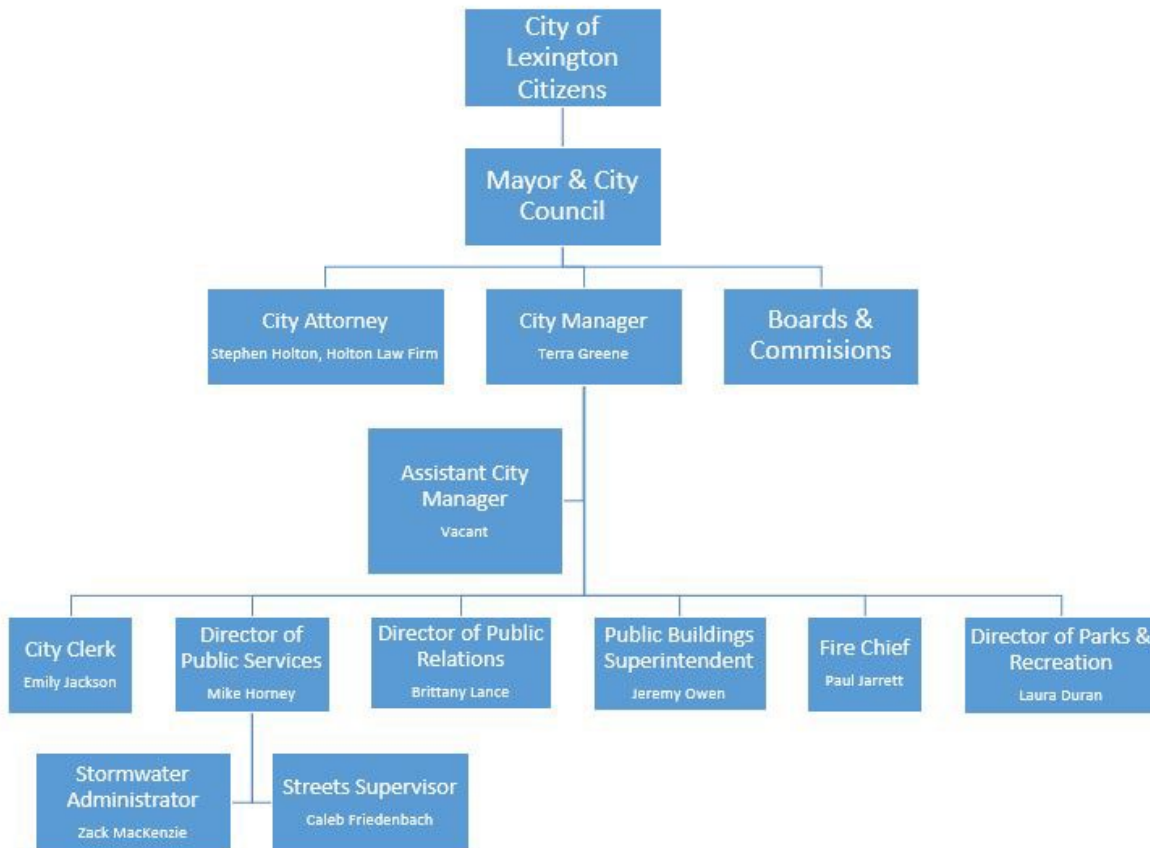


Table 8: Summary of Responsible Parties

SWMP Component	Responsible Position	Staff Name	Department
Stormwater Program Administration	Stormwater Administrator	Zack MacKenzie	Public Services
SWMP Management	Stormwater Administrator	Zack MacKenzie	Public Services
Public Education & Outreach	Stormwater Administrator, Director of Public Relations	Zack MacKenzie, Brittany Lance	Public Services, Public Relations
Public Involvement & Participation	Stormwater Administrator, Director of Public Relations	Zack MacKenzie, Brittany Lance	Public Services, Public Relations
Illicit Discharge Detection & Elimination	Stormwater Administrator	Zack MacKenzie	Public Services
Construction Site Runoff Control	Winston-Salem Regional Office	Jalen Hairston	NCDEQ Winston-Salem Regional Office
Post-Construction Stormwater Management	Stormwater Administrator	Zack MacKenzie	Public Services
Pollution Prevention/Good Housekeeping for Municipal Operations	Stormwater Administrator	Zack MacKenzie	Public Services
Municipal Facilities Operation & Maintenance Program	Public Buildings Superintendent	Jeremy Owen	Public Buildings
Spill Response Program	Stormwater Administrator, Fire Chief	Zack MacKenzie, Paul Jarrett	Public Services, Fire
MS4 Operation & Maintenance Program	Stormwater Administrator	Zack MacKenzie	Public Services
Municipal SCM Operation & Maintenance Program	Stormwater Administrator	Zack MacKenzie	Public Services
Pesticide, Herbicide & Fertilizer Management Program	Parks & Recreation Director	Laura Duran	Parks & Recreation

Vehicle & Equipment Cleaning Program	Stormwater Administrator, Equipment Operators	Zack MacKenzie, Equipment Operators	Public Services, Each Department with Operators
Pavement Management Program	Streets Supervisor, Stormwater Administrator	Caleb Friedenbach, Zack MacKenzie	Public Services
Total Maximum Daily Load (TMDL) Requirements	Stormwater Administrator	Zack MacKenzie	Public Services

4.2 Program Funding and Budget

In accordance with the issued permit, the City of Lexington 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.

For Fiscal Year 2019/2020, the stormwater budget was approximately \$50,000, funded in combination by the Water Resources Department and the General Fund. Beginning in February 2021, a monthly stormwater utility fee is being assessed to all properties within the city limits with an impervious surface area equal to or greater than 400 ft². Single-family residential properties are assessed a fee of \$3.50 on the monthly utility bill. Non-single-family residential, commercial, and industrial properties are assessed a monthly fee on the utility bill based on the amount of impervious surface area on the property. These properties are assessed \$3.50 per Equivalent Residential Unit (ERU), which is equal to 2,700 ft² in Lexington. Approximately \$990,000 has been budgeted for operational costs for Fiscal Year 2021/2022.

4.3 Shared Responsibility

The City of Lexington 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 City of Lexington remains responsible for compliance if the other entity fails to perform the permit obligation, and may be subject to enforcement action if neither the City of Lexington 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)
Construction Site Runoff Controls	State Sediment and Erosion Control Program	N

Per Section E of the MS4 permit, the city relies on the State Sediment and Erosion Control Program to comply with the Construction Site Runoff Controls minimum measure. Neither Davidson County nor the City of Lexington administers an erosion control program. However, the city promotes the state’s “Stop Mud” hotline through education efforts and in response to calls to the city’s pollution hotline.

4.4 Co-Permittees

There are no other entities applying for co-permittee status under the NPDES MS4 permit number NCS000584 for the City of Lexington. 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 City of Lexington 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.	Program Adequacy			
	Evaluate the adequacy of resources and funding allocated to Stormwater Services for compliance with the MS4 Permit.	1. Perform an analysis of the Stormwater program to determine if funding and staffing is adequate to comply with SWMP and all six Minimum Control Measures.	1. Permit Year 1	1. Adequate/Inadequate
2.	Minimum Control Measure Implementation			
	Develop a written program for each of the six Minimum Control Measures including purposes, methods, scheduling, SOPs, etc., and review the programs annually.	1. Develop a written Illicit Discharge Detection and Elimination Program.	1. Permit Year 1	1. Yes/No
		2. Develop a written Pollution Prevention & Good Housekeeping Program.	2. Permit Year 1	2. Yes/No
		3. Develop a written Post-Construction Site Runoff Control Program.	3. Permit Year 1	3. Yes/No
		4. Develop a written Public Education & Outreach Program	5. Permit Year 1	5. Yes/No
		5. Develop a written Construction Site Runoff Control Program.	4. Permit Year 2	4. Yes/No
		6. Develop a written Public Involvement & Participation Program.	6. Permit Year 2	6. Yes/No
		7. Review all written programs and update if needed.	7. Permit Years 2-5	7. Yes/No

Table 11: Program Administration BMPs

3.	Annual Self-Assessment			
	Evaluate the performance and effectiveness of the program components at least annually. Results shall be used to modify the program components as necessary to accomplish the intent of the Stormwater Program.	1. Prepare, conduct, and document an annual evaluation of the program components.	1. Annually Permit Years 1 – 5	1. Yes/No
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
4.	Permit Renewal Application			
	Submit a permit renewal application and Draft SWMP no later than 180 days prior to permit expiration.	1. Draft SWMP applicable to the proceeding 5 years following permit re-issuance.	1. Permit Year 5	1. Yes/No
		2. Certify the stormwater permit renewal application (Permit renewal application form and Draft SWMP for the next 5-year permit cycle) and submit to NCDEQ at least 180 days prior to permit expiration.	2. Permit Year 5	2. Date of permit renewal application submittal

PART 5: PUBLIC EDUCATION AND OUTREACH PROGRAM

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

Table 12: Summary of Target Pollutants & Audiences

Target Pollutants/Sources	Target Audience(s)
Litter	Residents, businesses, schools, General Public
Yard Waste	Residents, businesses, schools
Nutrients	Residents, businesses, schools
Sediment	Construction
Fecal Coliform	Residents, businesses, schools
Fats, Oils, & Grease	Residents, businesses, schools
Illicit Discharges	Residents, businesses, schools, municipal staff
Illegal Dumping	Residents, businesses, schools, municipal staff
Improper Disposal of Waste	Residents, businesses, schools, municipal staff
General non-point sources pollution	Residents, businesses, schools, municipal staff

The City of Lexington will manage, implement and report the following public education and outreach BMPs. The City of Lexington has partnered with Stormwater SMART from the Piedmont Triad Regional Council (PTRC) since its creation in 2005. The City of Lexington does not rely solely on Stormwater SMART to host educational events, however, their many resources (graphics, mailings, brochures, etc.) are utilized to share stormwater information with Lexington residents, businesses, and employees. While the partnership between Lexington and Stormwater SMART has always operated on an informal agreement, one of the Public Education & Outreach BMPs outlined in this SWMP will be to enter into a contract with Stormwater SMART.

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
5.	Partnership with Stormwater SMART			
	Continue partnership with Stormwater SMART and enter into a contract.	1. Enter into a contract with Stormwater SMART and outline the city's needs for educational materials to be provided by them.	1. Permit Year 1	1. Yes/No
		2. Review the agreement with Stormwater SMART to ensure that all requirements of permit Section 3.2 are being met and maintain contract.	2. Permit Years 2-5	2. Yes/No
6.	Participation in Annual City Events*			
	Participate in annual events (e.g. Barbecue Festival, Multicultural Festival, etc.) hosted by the City of Lexington as an opportunity to educate citizens about stormwater.	1. Prepare educational materials/presentations to be shared at public events.	1. Permit Year 1	1. Yes/No
		2. Participate in at least two annual public events as they are scheduled.	2. Permit Years 1-5	2. Number of events
7.	School Outreach*			
	Make contact with local schools to present to classes about stormwater or participate in events such as career fairs.	1. Prepare educational materials/presentations that will be tailored to varying grade levels.	1. Permit Year 1	1. Yes/No
		2. Visit at least two city schools for educational presentations.	2. Permit Years 1-5	2. Number of school visits

Table 13: Public Education and Outreach BMPs

8.	Local Community Organization Outreach*			
	Make contact with community organizations, such as local clubs, faith groups, scout troops, etc., to present about stormwater and provide educational materials.	1. Prepare educational materials/presentations that will be tailored to the audience of each organization.	1. Permit Year 1	1. Yes/No
2. Attend at least two community organization meetings for educational presentations.		2. Permit Years 1-5	2. Number of meetings attended	
9.	Potential Polluter Program			
	Develop a program identifying potential polluters to stormwater, such as restaurants, painters, landscapers, carwashes, etc., and make contact with and provide educational materials specific to each business type.	1. Identify common business types with a potential to cause stormwater pollution.	1. Permit Year 1	1. Yes/No
		2. Select one business type to focus on and begin creating educational materials.	2. Permit Year 2	2. Yes/No and business type
		3. Locate and make contact with all businesses of the first selected type and evaluate their housekeeping practices and provide them with educational information.	3. Permit Year 3	3. Number of business contacted
		4. Select a second business type to focus on and begin creating educational materials.	4. Permit Year 4	4. Yes/No and business type
		5. Locate and make contact with all businesses of the second selected type and evaluate their housekeeping practices and provide them with educational information.	5. Permit Year 5	5. Number of businesses contacted
6. Continue to develop the list of business types with a potential to cause stormwater pollution based on IDDE Program BMP No. 28.2		6. Permit Years 1-5	6. Yes/No and list of business types	

Table 13: Public Education and Outreach BMPs

10.	Billing Inserts			
	Create and mail billing inserts about stormwater and potential sources of pollution, such as FOG, car washing, yard waste, household hazardous waste, etc.	1. Create brochures to be inserted with utility bills, particularly as is relevant to the time of year (e.g. yard waste/leaves in the fall).	1. Permit Years 1-5	1. Yes/No
		2. Mail brochures to all utility customers within city limits.	2. Permit Years 1-5	2. Number of inserts mailed
11.	Social Media Campaign			
	Use the city's existing social media platforms to post information about stormwater pollution prevention and upcoming events.	1. Post information quarterly to each social media account using information developed from the above-mentioned BMPs	1. Quarterly	1. Number of posts
		2. Post alerts for upcoming stormwater events.	2. Permit Years 1-5	2. Yes/No
12.	Signage in City Open Spaces			
	Create signs to be placed in city open spaces to provide information about nearby stormwater-related concerns, for example, stream buffers or pet waste in city parks.	1. Create the signs and the educational topic and locate areas appropriate for each topic.	1. Permit Year 3	1. Yes/No
		2. Install 4 signs around city open spaces.	2. Permit Year 4	2. Number of signs

Table 13: Public Education and Outreach BMPs

Permit Ref.	2.1.7, 3.2.3 and 3.6.5(c): Web Site Measures to provide a web site designed to convey the program’s message(s) and provide online materials including ordinances, or other regulatory mechanisms, or a list identifying the ordinances or other regulatory mechanisms, providing the legal authority necessary to implement and enforce the requirements of the permit and SWMP. The web page shall also provide developers with all relevant post-construction requirements, design standards, checklists and/or other materials.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
13.	Stormwater Webpage			
	Maintain and update the existing stormwater webpage on the city’s website. This webpage will include information about the stormwater program, such as the permit, SWMP, annual reports, and a link to the ordinance. An event calendar, educational materials, and information for reporting stormwater concerns will also be included.	1. Add the MS4 permit, approved SWMP, annual reports, and a link to the ordinance. Update these as needed.	1. Annually	1. Yes/No
		2. Update the webpage and calendar with educational materials and events as they occur.	2. Monthly	2. Yes/No
		3. Maintain a section of the webpage about post-construction regulations, including documents such as permits, O&M Agreements, As-Built forms, etc.	3. Annually	3. Yes/No
		4. Develop and maintain a mechanism to record the number of visits for the stormwater webpage.	4. Annually	4. Number of visits

Table 13: Public Education and Outreach BMPs

Permit Ref.	3.2.5: Stormwater Hotline Measures for a stormwater hotline/helpline for the purpose of public education and outreach.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
14.	Stormwater Hotline			
	Maintain the existing stormwater hotline for reporting stormwater concerns and provide educational materials to citizens so they are aware of the hotline.	1. Answer calls from residents with stormwater concerns.	1. Continuous	1. Number of calls
		2. Provide information to the approximately 15 staff members answering phones to help them appropriately identify a concern specific to stormwater, including issues with sediment control (see BMP No. 35).	2. Annually	2. Number of staff
3. Include information about the hotline on all stormwater educational materials.		3. Annually	3. Yes/No	

**As the situation with COVID-19 continues to be monitored, some of the implementation schedules of these BMPs may be adjusted. In an attempt to remain on schedule, events will be hosted online when possible.*

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 City of Lexington will manage, implement and report the following public involvement and participation BMPs.

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
15.	Proposed Changes to SWMP			
	In accordance with any necessary approval from NCDEQ, major revisions to the SWMP or stormwater ordinance will be presented to city council and include an opportunity for public comment.	1. After annual assessment and review of the SWMP, propose any major revisions to the SWMP or ordinance to City Council.	1. Annually	1. Yes/No
16.	City Council Input			
	City staff will bring stormwater issues before the City Council to receive citizen input and factor stormwater into development decisions.	1. Include annual agenda items for City Council to address public concerns regarding stormwater and receive input from Council and the public.	1. Annually, per current City of Lexington Council meeting schedules	1. Record date of meetings.
17.	Stormwater Hotline			
	Maintain the existing stormwater hotline for reporting stormwater concerns and provide educational material to citizens so they are aware of the hotline.	1. Answer calls from residents with stormwater concerns.	1. Continuous	1. Number of calls
		2. Provide information to the approximately 15 staff members answering phones to help them appropriately identify a concern specific to stormwater, including issues with sediment control (See BMP No. 35)	2. Annually	2. Number of staff
3. Include information about the hotline on all stormwater education materials.		3. Annually	3. Yes/No	

Table 14: Public Involvement and Participation BMPs

Permit Ref.	3.3.2: Volunteer Opportunities Measures to provide volunteer opportunities designed to promote ongoing citizen participation.			
BMP No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
18.	Council Ward Litter Cleanups			
	Reach out to council members and their constituents to organize a litter cleanup in their ward. Allow the residents to identify an area that needs the most attention.	1. Organize and attend a litter cleanup in all six wards and provide the resources needed. Use the opportunity to talk about stormwater, make residents aware of the hotline, and share educational materials.	1. Annually	1. Number of cleanup events
19.	Adopt-a-Stream			
	Develop and maintain an Adopt-a-Stream program so volunteer groups can choose a local stream segment to clean up litter.	1. Develop the program, such as information about the new program and the requirements for adopting a stream, and obtain supplies that will be needed for cleanups.	1. Permit Year 2	1. Yes/No
		2. Begin the program by sending out billing inserts to all the utility customers in Lexington. Also utilize social media and promote during other educational events.	2. Permit Year 3	2. Number of inserts mailed
		3. Enroll groups into the program and attend the first cleanup event for each group to give them supplies and to share information about stormwater.	3. Annually, beginning in Permit Year 3	3. Number of groups
		4. Maintain a list and map of adopted streams.	4. Annually, beginning in Permit Year 3	4. Update this list and map.
		5. Maintain a schedule of the cleanups to track the number of cleanups that should be occurring and to ensure that groups are still involved with the program.	5. Annually, beginning in Permit Year 3	5. Number of cleanups

Table 14: Public Involvement and Participation BMPs

20.	Storm Drain Markers			
	Provide volunteer groups with educational storm drain markers to place on drains in areas of their choosing.	1. Design and have made the storm drain markers.	1. Permit Year 3	1. Yes/No
		2. Begin the program by sending out information about the new program in billing inserts to all the utility customers in Lexington. Also utilize social media and promote during other educational events.	2. Permit Year 4	2. Number of inserts mailed
		3. Meet with groups to hand out markers and supplies and share information about stormwater.	3. Annually, beginning in Permit Year 4	3. Number of markers installed
		4. Maintain a count and map of the markers placed.	4. Annually, beginning in Permit Year 4	4. Yes/No

PART 7: ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM

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

Table 15: Illicit Discharge Detection and Elimination BMPs				
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
21.	Completion of MS4 Mapping			
	Utility Services Administration and Stormwater Services staff will complete the final 30% of the initial stormwater system mapping.	1. Complete 10% of the remaining mapping each year.	1. Permit Years 1-3	1. Percentage of remaining mapping that was completed
22.	Identify Major Outfalls			
	Classify outfalls as Major or Minor for the outfalls that have currently been mapped, and continue this classification as the initial mapping is completed.	1. Use available attributes and current outfall locations in GIS to classify all currently-known outfalls as Major Outfalls or Minor Outfalls.	1. Permit Year 1	1. Yes/No
		2. Continue the classification of outfalls as the initial mapping is completed.	2. Permit Years 1-3	2. Yes/No
		3. Update and improve accuracy of outfall locations and classifications through the Stormwater Infrastructure Assessment (See BMP No. 24).	3. Annually, beginning at project start	3. Yes/No
23.	Continual Updates to MS4 Map			
	The MS4 map will be continuously updated for completeness.	1. Add new stormwater infrastructure and outfalls when they are located or constructed.	1. Annually	1. Yes/No

Table 15: Illicit Discharge Detection and Elimination BMPs

24.	Stormwater Infrastructure Assessment			
	Hire a consultant to perform an assessment of the municipal stormwater conveyance system, including documenting feature attributes, such as pipe/drain size, material, depth, etc.	1. Have a contract and scope of work agreed upon between the city and consultant.	1. TBD – potentially Permit Year 3	1. Yes/No
		2. Update Lexington GIS with the information provided from the consultant, including locating outfalls and updating classifications.	2. Annually, beginning at project start	2. Yes/No
		3. Provide the consultant and workers with information about identifying illicit connections and discharges and how to report them to Stormwater Services (See BMP No. 29).	3. TBD – beginning of project	3. Yes/No
4. Maintain a record of IDDE concerns identified by the consultant and follow up in accordance with BMP No. 31.		4. Continuously, throughout project completion	4. Yes/No	
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
25.	Maintain Legal Authority			
	Review the existing ordinance (Code of Ordinances Chapter 15) in order to maintain the legal authority to prohibit, detect, and eliminate illicit discharges in the MS4. Update the ordinance if required.	1. Review the ordinance and update if a revision is required to maintain legal authority.	1. Annually	1. Yes/No

Table 15: Illicit Discharge Detection and Elimination BMPs

BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
Permit Ref.	<p>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:</p> <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. 			
26.	Outfall Inspections			
	Perform regular dry-weather (no rain in previous 72 hours) outfall inspections to proactively identify illicit connections and discharges.	1. Provide training to staff performing outfall inspections to know how to detect and trace non-stormwater discharges.	1. Annually	1. Yes/No
		2. Split Major Outfalls into five equal groups for inspection with one group being inspected each year.	2. Permit Year 1	2. Yes/No
		3. Inspect 20% of outfalls each year in dry weather conditions. Document each inspection and any non-stormwater discharges identified.	3. Permit Years 1-5	3. Percentage of outfalls inspected
27.	IDDE Standard Operating Procedure			
	Create and maintain a Standard Operating Procedure (SOP) for IDDE investigation, enforcement, and follow-up.	1. Create an SOP for the IDDE program.	1. Permit Year 1	1. Yes/No
		2. Review the SOP for any needed revisions.	2. Annually	2. Yes/No

Table 15: Illicit Discharge Detection and Elimination BMPs

28.	IDDE Program Evaluation			
	Evaluate the IDDE Program annually to promote continuance of effective components and improvements in areas that are lacking and to identify common sources of pollutants and hotspot areas around the city.	1. Hold an evaluation meeting with IDDE program stakeholders; to include at least the Stormwater Administrator and the Public Services Director.	1. Annually, in conjunction with the annual assessment	1. Yes/No
		2. Review of IDDE reports to identify chronic violators, common sources of pollutants, and hotspot areas.	2. Annually, in conjunction with the annual assessment	2. Record the number of illicit discharges found and resolved and any enforcement actions taken.
Permit Ref.	3.4.4: IDDE Tracking Measures for tracking and documenting the date(s) an illicit discharge, illicit connection or illegal dumping was observed, the results of the investigation, any follow-up of the investigation, the date the investigation was closed, the issuance of enforcement actions, and the ability to identify chronic violators.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
29.	IDDE Tracking System			
	Use a combination of the Cayenta Issues Console, an asset management system (currently Asset Essentials), and IDDE spreadsheet to track resident and staff reports of stormwater concerns and investigation into these concerns.	1. Use the Issues Console in the Cayenta billing system to track the receipt and response to residents' calls about stormwater concerns.	1. Continuously, beginning Permit Year 1	1. Yes/No
		2. Use an asset management system (currently Asset Essentials) to document and map the investigation, follow-up, and any enforcement for IDDE related concerns.	2. Continuously, beginning Permit Year 1	2. Yes/No
3. Use a spreadsheet to document caller, location, the type of stormwater concern, responsible party, and if enforcement actions were pursued.		3. Continuously, beginning Permit Year 1	3. Yes/No	

Table 15: Illicit Discharge Detection and Elimination BMPs

Permit Ref.	3.4.5: Staff IDDE Training			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
30.	Non-Stormwater Staff Training			
	Staff having the potential to come across IDDE concerns (field crews, enforcement officers, etc.) will be given information on identifying non-stormwater discharges and reporting them to Stormwater Services.	1. Provide information to approximately 200 field workers on identifying non-stormwater discharges.	1. Annually	1. Number of employees
31.	Contractor Training			
	Contractors having the potential to come across IDDE concerns (e.g. utility workers) will be given information on identifying non-stormwater discharges and reporting them to Stormwater Services.	1. Provide information on identifying non-stormwater discharges.	1. As needed	1. Yes/No
32.	Fact Sheets			
	Post a fact sheet to the city’s internal website (The PIT) and hang posters in employee common areas to provide all staff with general information about identifying and reporting illicit discharges, connections, and dumping.	1. Create a fact sheet.	1. Permit Year 1	1. Yes/No
		2. Post the fact sheet to The PIT and hang 12 posters in common areas.	2. Permit Year 1	2. Number of posters
		3. Review fact sheet for needed changes and rehang posters, if needed.	3. Annually	3. Yes/No

Table 15: Illicit Discharge Detection and Elimination BMPs

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	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
33.	Stormwater Hotline			
	Maintain the existing stormwater hotline for reporting stormwater concerns and provide educational materials to citizens so they are aware of the hotline.	1. Answer calls from residents with stormwater concerns.	1. Continuous	1. Number of calls
		2. Provide information to the approximately 15 staff members answering phones to help them appropriately identify a concern specific to stormwater, including issues with sediment control (see BMP No. 35)	2. Annually	2. Number of staff
		3. Include information about the hotline on all stormwater educational materials.	3. Annually	3. Yes/No
34.	Stormwater Webpage			
	Maintain and update the existing stormwater webpage on the city's website. This webpage will include information about the stormwater program, such as the permit, SWMP, annual reports, and a link to the ordinance. An event calendar, educational materials, and information for reporting stormwater concerns will also be included.	1. Add the MS4 permit, approved SWMP, annual reports, and a link to the ordinance. Update these as needed.	1. Annually	1. Yes/No
		2. Update the webpage and calendar with educational materials and events as they occur.	2. Monthly	2. Yes/No
		3. Maintain a section of the webpage about post-construction regulations, including documents such as permits, O&M Agreements, As-Built forms, etc.	3. Annually	3. Yes/No
		4. Develop and maintain a mechanism to record the number of visits for the stormwater webpage.	4. Annually	4. Number of visits

PART 8: CONSTRUCTION SITE RUNOFF CONTROL PROGRAM

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

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

Permit Reference	State or Local Program Name	Legal Authority	Implementing Entity
3.5.1 - 3.5.4	State Implemented SPCA Program	15A NCAC Chapter 04	NCDEQ

The City of Lexington 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	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
35.	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, including promoting the state’s “Stop Mud” hotline.	1. Train approximately 15 employees on proper handling of construction site runoff control complaints.	1. Annually Permit Years 1 – 5	1. Number of employees trained

Table 17: Construction Site Runoff Control BMPs

36.	Stormwater Hotline			
	Maintain the existing stormwater hotline for reporting stormwater concerns and provide educational materials to citizens so they are aware of the hotline.	1. Answer calls from residents with stormwater concerns.	1. Continuous	1. Number of calls
		2. Provide information to the approximately 15 staff members answering phones to help them appropriately identify a concern specific to stormwater, including issues with sediment control.	2. Annually	2. Number of staff
		3. Include information about the hotline on all stormwater educational materials.	3. Annually	3. Yes/No
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	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
37.	Establish and Maintain Legal Authority			
	Develop and implement an ordinance to require construction site operators to control waste.	1. Adopt ordinance.	1. Permit Year 2	1. Yes/No
		2. Review the ordinance and update if a revision is required to maintain legal authority.	2. Annually, after ordinance is adopted	2. Yes/No
38.	Contractor Education			
	Communicate new waste management requirements to construction site operators.	1. Create a fact sheet to share at pre-construction meetings.	1. Permit Year 2, after ordinance is adopted	1. Yes/No
		2. Add fact sheet to the website.	2. Permit Year 2, after ordinance is adopted	2. Yes/No
		3. Distribute the fact sheet at pre-construction meetings.	3. Continuously, after the ordinance is adopted	3. 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 City of Lexington 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 City of Lexington 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 City of Lexington has existing requirements other than Qualifying Alternative Programs for implementation of the NPDES Phase II MS4 post-construction program requirements. These existing requirements are codified in local ordinances, and implementation is further defined in guidance, manuals and/or standard operating procedures 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	City of Lexington Code of Ordinances – Chapter 15, Article I, Section 1.1	11-13-2017
3.6.3(a) & 15A NCAC 02H.0153(c) Federal, State & Local Projects		
3.6.3(b) Plan Review	City of Lexington Code of Ordinances – Chapter 15, Article I, Section 2	11-13-2017
3.6.3(c) O&M Agreement	City of Lexington Code of Ordinances – Chapter 15, Article I, Section 4.2	11-13-2017
3.6.3(d) O&M Plan		
3.6.3(e) Deed Restrictions/Covenants	City of Lexington Code of Ordinances – Chapter 15, Article I, Sections 3.4 and 3.5	11-13-2017
3.6.3(f) Access Easements	City of Lexington Code of Ordinances – Chapter 15, Article I, Section 4.9	11-13-2017
Permit Requirements for Inspections and Enforcement	Municipal Ordinance/Code Reference(s) and/or Document Title(s)	Date Adopted
3.6.2(b) Documentation	City of Lexington Code of Ordinances – Chapter 15, Article I, Section 4.7	11-13-2017
3.6.2(c) Right of Entry	City of Lexington Code of Ordinances – Chapter 15, Article I, Section 4.2	11-13-2017
3.6.4(a) Pre-CO Inspections	City of Lexington Code of Ordinances – Chapter 15, Article I, Section 2.3	11-13-2017
3.6.4(b) Compliance with Plans	City of Lexington Code of Ordinances – Chapter 15, Article I, Sections 3.4 and 3.5	11-13-2017
3.6.4(c) Annual SCM Inspections	City of Lexington Code of Ordinances – Chapter 15, Article I, Section 4.1.2	11-13-2017
3.6.4(d) Low Density Inspections		
3.6.4(e) Qualified Professional	City of Lexington Code of Ordinances – Chapter 15, Article I, Section 4.1.2	11-13-2017
Permit Requirements for Fecal Coliform Reduction	Municipal Ordinance/Code Reference(s) and/or Document Title(s)	Date Adopted
3.6.6(a) Pet Waste	City of Lexington Code of Ordinances – Chapter 8, Article II, Division 4, Section 8- 63	9-12-2011
3.6.6(b) On-Site Domestic Wastewater Treatment	Davidson County Health Department Application, Evaluation, and Permitting Procedures for Wastewater Systems - enforcing 15A NCAC 18A .1900	1977 General Statute

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
39.	Standard Reporting			
	Implement standardized tracking, documentation, inspections and reporting mechanisms to compile appropriate data for the annual self-assessment process. Data shall be provided for each Post-Construction/Qualifying Alternative Program being implemented as listed in Tables 18 and 19.	1. Track number of low-density and high-density plan reviews performed.	1. Continual	1. Number of plan reviews performed for low-density and high-density
		2. Track number of low density and high density plans approved.	2. Continual	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. Continual	3. Summary of number and type of SCMs added to the inventory; and number and acreage of low-density projects constructed
		4. Track number of SCM inspections performed.	4. Continual	4. Number of SCM inspections
		5. Track number of low-density inspections performed.	5. Continual	5. Number of low-density projects inspected
		6. Track number and type of enforcement actions taken.	6. Continual	6. Number of enforcement actions issued
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
This permit requirement is fully met by the existing post-construction program. See references provided in Table 19.				

Table 20: Post Construction Site Runoff Control BMPs

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
40.	Revisions to Code of Ordinances			
	Revise existing ordinance to specifically require compliance by Federal, State, and Local government projects.	1. Revise ordinance to require Federal, State, and Local government projects to comply with post-construction requirements unless subject to its own NPDES MS4 permit or qualifying alternative program.	1. Permit Year 2	1. Yes/No
41.	Operation & Maintenance Plan			
	Add an ordinance to the city code requiring each Stormwater Control Measure to have an Operation & Maintenance Plan that complies with 15A NCAC 02H .1050(13).	1. Establish legal authority through additional ordinance.	1. Permit Year 2	1. Yes/No

Table 20: Post Construction Site Runoff Control BMPs

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
42.	Inspection Procedures for Structural SCMs			
	Create an inventory of SCMs and procedures for inspections and documentation.	1. Create an inventory of structural SCMs, including mapping and unique identifiers for each SCM.	1. Permit Year 1	1. Yes/No
		2. Create an SOP for inspection and documentation of SCMs during construction and post-construction.	2. Permit Year 1	2. Yes/No
		3. Begin procedures created for post-construction inspections.	3. Permit Year 1	3. Number of inspections
43.	Inspection of Low-Density Projects			
	Establish the legal authority for inspection of low-density projects at least once during the permit term, and carry out the inspections.	1. Establish legal authority through code revision.	1. Permit Year 2	1. Yes/No
		2. Conduct inspections of 20% of low-density projects each year.	2. Continual	2. Number of low-density projects inspected

Table 20: Post Construction Site Runoff Control BMPs

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
44.	Pet Waste Stations			
	Educate residents about disposing of pet waste, and inventory pet waste stations currently around the city and identify spots in public areas where additional stations could help reduce pet waste pollution.	1. Create an inventory, including mapping, of pet waste stations currently around the city.	1. Permit Year 1	1. Yes/No
		2. Educate residents about the importance of disposing of pet waste through the implementation of BMP Nos. 10-12.	2. Permit Year 2	2. Yes/No
		3. After the inventory is completed, identify spots in public areas that would be benefitted by more stations, including relying on input from residents.	3. Permit Year 2	3. Yes/No
		4. Install pet waste stations in the areas identified.	4. Permit Year 3	4. Number of pet waste stations
		5. Collect the waste disposed of at the stations on the regular public trash pickup schedule and record how many bags are purchased each year.	5. Continuously, beginning Permit Year 3	5. Number of bags purchased

PART 10: POLLUTION PREVENTION AND GOOD HOUSEKEEPING PROGRAMS

This SWMP provides a comprehensive pollution prevention and good housekeeping strategy for the City of Lexington 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 City of Lexington 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
45.	Inventory of Municipal Facilities			
	Develop and maintain an up-to-date inventory of all municipal facilities.	1. Compile a list of existing city-owned facilities.	1. Permit Year 1	1. Yes/No
		2. Perform initial inspections of all city facilities. Classify facilities as having high or low potential for stormwater pollution.	2. Permit Year 2	2. Yes/No
		3. Determine if any facilities require an SPCC plan.	3. Permit Year 2	3. Yes/No
		4. Determine if any facilities currently have or require an NPDES industrial permit (see BMP No. 47).	4. Permit Year 2	4. Yes/No
		5. Update inventory as needed when facilities are added or closed.	5. Continual	5. Yes/No
46.	Facility Inspections			
	Inspect city facilities to confirm good housekeeping practices are being followed, including vehicle and equipment cleaning (see BMP No. 56).	1. Develop an SOP for city facility inspections, including an inspection schedule, inspection report documentation, and tracking system.	1. Permit Year 1	1. Yes/No
		2. Implement annual facility inspections for high stormwater pollution potential facilities and once-per-permit term inspections for low potential facilities.	2. Conduct annual and once-per-permit-term inspections, beginning in Permit Year 2.	2. Number of inspections

Table 21: Pollution Prevention and Good Housekeeping BMPs

47.	NPDES Industrial Permit Compliance			
	Ensure that NPDES industrial permit compliance occurs at all applicable municipally owned sites.	1. Develop an industrial facility inspection form.	1. Permit Year 1	1. Yes/No
		2. Review municipal facilities inventory and inspections to determine which facilities currently have or require an NPDES permit.	2. Permit Year 2	1. Yes/No
		3. Apply for new permits and confirm that existing permits are not expired.	2. Annually, beginning Permit Year 2	2. Yes/No
		4. Perform facility inspections for compliance with permits.	4. Annually, Permit Year 2 for current industrial permits or a year after new permits are acquired.	4. Number of inspections
		5. Create an NPDES industrial permit tracking mechanism to maintain the list of municipally owned permitted facilities and inspection dates.	5. Permit Year 2	5. Yes/No
48.	Staff Training			
	Develop a staff training program for general stormwater pollution prevention for the municipal facilities being inspected.	1. Develop an appropriate training program.	1. Permit Year 1	1. Yes/No
		2. Provide training for all employees.	2. Annually, beginning in Permit Year 2	2. Number of trainings and employees present

Table 21: 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 Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
49.	Inventory of Facilities with Spill Potential			
	Maintain a list of city facilities and operations storing materials that would be a pollutant if spilled and introduced to the stormwater system and classify by hazard and quantity (see BMP No. 45.2)	1. Update list of city facilities and operations with spill potential when facilities or operations are changed.	1. When necessitated by changes in facilities or operations	1. Yes/No
50.	Spill Response Procedures			
	Develop written spill response procedures and continue training of appropriate staff.	1. Develop general spill response procedures.	1. Permit Year 1	1. Yes/No
		2. Develop specific spill response procedures for city facilities and operations with potential to produce high hazard spills.	2. Permit Year 1	2. Yes/No
		3. Update as facilities and operations are revised.	3. When necessitated by changes in facilities or operations	3. Yes/No
		4. Coordinate with Lexington Fire Department to have staff trained in spill response procedures.	4. Permit Year 1	4. Number of employees trained
		5. Train staff at facilities with potential for high hazard spills in first response actions and reporting procedures.	6. Annually	6. Number of employees trained

Table 21: Pollution Prevention and Good Housekeeping BMPs

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
51.	Staff Training			
	Develop a staff training program for general stormwater pollution prevention for Public Services employees.	1. Develop and appropriate training program.	1. Permit Year 1	1. Yes/No
		2. Provide training for all employees.	2. Annually, beginning in Permit Year 2	2. Number of trainings and employees present
52.	MS4 Inspections and Maintenance			
	Develop a proactive plan for MS4 maintenance, requiring regular inspections and maintenance.	1. Develop an SOP that includes proactive inspection schedules, standard documentation, staff responsibilities, and proper maintenance training.	1. Permit Year 1	1. Yes/No
		2. Develop an inspection and maintenance tracking system to be used in accordance with the SOP.	2. Permit Year 1	2. Yes/No
		3. Verify, document, and prioritize maintenance activities identified by inspections or citizen reports.	3. Continuous	3. Number of inspections and maintenance activities

Table 21: Pollution Prevention and Good Housekeeping BMPs

Permit Ref.	3.7.4: Municipal SCM Operation and Maintenance Program			
BMP No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
53.	Inventory of Municipal Structural SCMs			
	Develop an inventory of municipal structural SCMs to include location, SCM type, design plans, O&M plans, and method for documenting inspections.	1. Develop the Municipal SCM inventory.	1. Year 1	1. Yes/No
54.	SCM Inspection and Maintenance			
	Develop the inspection and maintenance program and perform and document inspections and maintenance activities for municipal structural SCMs.	1. Develop the inspection and maintenance program and begin inspections.	1. Year 1	1. Yes/No/NA
Permit Ref.	3.7.5: Pesticide, Herbicide and Fertilizer Management Program			
BMP No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
55.	Pesticide, Herbicide, Fertilizer Applicator Training			
	Train city staff who apply landscape chemicals in order to minimize water quality impacts from pesticides, herbicides, and fertilizers.	1. Maintain Right-of-Way Pest Control, Public Health Control, and Ornamental & Turf Pest Control applicator certifications for appropriate personnel.	1. Continuous	1. Yes/No
		2. Develop a pollution prevention and chemical use, storage, and handling training program.	2. Permit Year 2	2. Yes/No
		3. Provide staff training in pollution prevention and chemical use, storage, and handling.	3. Annually, beginning Permit Year 2	3. Number of employees trained

Table 21: Pollution Prevention and Good Housekeeping BMPs

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	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
56.	Vehicle and Equipment Cleaning and Maintenance Facility Inspection			
	Conduct routine inspections as part of general facility inspections (see BMP No. 48) to ensure that vehicle and equipment facilities are following proper procedures to minimize water quality impacts from vehicle and equipment cleaning and maintenance.	1. Develop an inspection checklist.	1. Permit Year 1	1. Yes/No
		2. Perform inspections using inspection checklist and notify facility manager of any corrective actions required.	2. Annually, beginning in Permit Year 2	2. Yes/No
		3. Perform re-inspections of any facility that required corrective action.	3. As required by corrective actions issued	3. Yes/No
57.	Staff Training			
	Provide general stormwater awareness training and pollution prevention training to employees working in vehicle maintenance and cleaning areas (see BMP No. 48)	1. Provide training for all employees.	1. Annually, beginning Permit Year 2	1. Number of trainings and employees present

Table 21: Pollution Prevention and Good Housekeeping BMPs

BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
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.			
58.	Street Sweeping			
	Develop a street sweeping program to implement a schedule in order to reduce pollutants from city-owned and –maintained streets.	1. Develop an SOP, including a schedule and plan to document streets swept, and identify areas that need to be swept more frequently.	1. Permit Year 1	1. Yes/No
		2. Implement the SOP, including the frequency schedule.	2. Annually, beginning in Permit Year 2	2. Total miles of streets swept and the volume of debris collected
59.	Leaf Collection			
	Develop a leaf collection program to implement a schedule in order to reduce pollution and clogging of storm drains, particularly focusing on efforts in the fall and winter (“leaf season”).	1. Develop an SOP, including a schedule and plan to document the areas addressed.	1. Permit Year 2	1. Have a leaf collection SOP.
		2. Implement SOP and documentation.	2. Annually, beginning in Permit Year 3	2. Record the volume of leaves collected.
60.	Vehicle Spill Cleanup			
	Maintain vehicle spill cleanup response procedures to prevent pollutants from vehicular accidents from entering the MS4.	1. Maintain spill response procedures (see BMP No. 50).	1. Continual	1. Yes/No
		2. Provide public education about stopping vehicle leaks (See BMP Nos. 10 and 11).	2. Permit Year 1	2. Yes/No