

Stormwater Management Plan
Town of Holly Springs
NCS000495

November 15, 2023



HOLLY SPRINGS
North Carolina

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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 Holly Springs 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 Holly Springs 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 NCS000495, 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 Holly Springs and located within the corporate limits of the Town of Holly Springs.

In preparing this SWMP, the Town of Holly Springs 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.

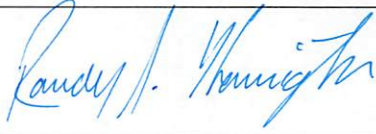
PART 2: CERTIFICATION

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.

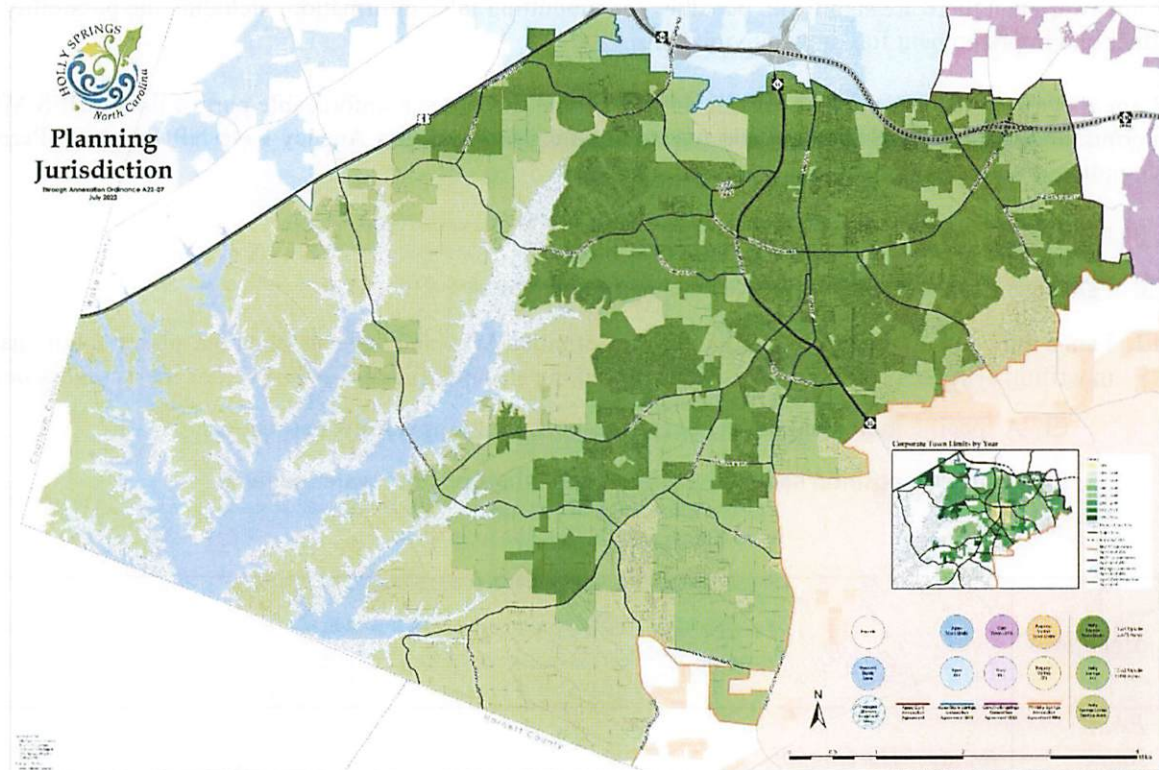
- I am a ranking elected official.
- I am a principal executive officer for the permitted MS4.
- I am a duly authorized representative for the permitted MS4 and have attached the authorization made in writing by a principal executive officer or ranking elected official which specifies me as (*check one*):
 - 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>	Randy J Harrington
<i>Title:</i>	Town Manager
Signed this 15th day of November, 2023.	

PART 3: MS4 INFORMATION

3.1 Permitted MS4 Area

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



3.2 Existing MS4 Mapping

The current MS4 GIS mapping includes manholes, junction boxes, culvert pipes/road crossings, ditches and discharges, as well as associated material and size descriptions. The majority of the MS4 has been mapped and is regularly updated as new development occurs in Town. The Town requires digital as-builts to be submitted as part of the development process to be added to the map upon receipt.

Table 1: Summary of Current MS4 Mapping

Percent of MS4 Area Mapped	95	%
No. of Major Outfalls* Mapped	200	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 ≥ 2-acres.*

3.3 Receiving Waters

The Town of Holly Springs MS4 is located within both the Cape Fear and Neuse 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:

- [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 (2018)
Neuse River Basin			
Middle Creek From 0.8 miles south of US1 to ut on west of creek 3.0 miles	27-43-15-(1)b1	C; NSW	Benthos (Nar, AL, FW)
Middle Creek From ut on west side of creek 3.0 miles downstream to backwaters of Sunset Lake	27-43-15-(1)b2	C; NSW	Benthos (Nar, AL, FW)
Middle Creek Sunset Lake	27-43-15-(2)	B; NSW	n/a
Middle Creek From dam at Sunset Lake to Swift Creek	27-43-15-(4)a	C; NSW	n/a
Basal Creek Bass Lake, Mills Pond	27-43-15-3	B; NSW	n/a
Rocky Branch From source to Middle Creek	27-43-15-4.5	C; NSW	n/a
Cape Fear River Basin			
Little White Oak Creek From Source to Harris Lake, Buckhorn Cr.	18-7-7	C	n/a
White Oak Creek From Source to Harris Lake, Buckhorn Cr.	18-7-6	C	n/a
Big Branch From Source to White Oak Creek.	18-7-6-1	C	n/a
Big Branch From Source to Harris Lake, Buckhorn Cr.	18-7-8	C	n/a
Little Branch From Source to Big Branch	18-7-6-1-1	C	n/a
Utley Creek From Source to Harris Lake, Buckhorn Cr.	18-7-5.5	C	n/a

Norris Branch From Source to Cary Branch	18-7-5-1	C	n/a
Cary Branch From Source to Harris Lake, Buckhorn Cr.	18-7-5	C	n/a
Jim Branch From Source to Harris Lake, Buckhorn Cr.	18-7-4	C	n/a
Buckhorn Creek From Source to Norfolk Southern Railroad	18-7-(1)	C	n/a

3.4 MS4 Interconnection

The Town of Holly Springs 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 the NCDOT MS4. The number of interconnections is estimated. Quantity: 80
- b. The interconnection is discharging stormwater into the NCDOT MS4. The number of interconnections is estimated. Quantity: 80
- c. The Town of Holly Springs MS4 mapping does identify interconnections with the NCDOT MS4.
- d. The Town of Holly Springs 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)
None	n/a	n/a	n/a

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

3.7 Industrial Facility Discharges

The Town of Holly Springs 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
NCG110096	Holly Springs WWTP
NCGNE1229	Seqirus, Inc.
NCG120096	Red Rock Disposal LLC
NCG160013	Holly Springs Asphalt Plant
NCG020087	Heidelberg Materials - Holly Springs Quarry

3.8 Non-Stormwater Discharges

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

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 Holly Springs to determine whether they may significantly impact water quality.

Table 6: Non-Stormwater Discharges

Non-Stormwater Discharge	Water Quality Impacts
Water line and fire hydrant flushing	Incidental

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

3.9 Target Pollutants and Sources

In addition to those target pollutants identified above, the Town of Holly Springs 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 program(s) that address each. In addition, the Town of Holly Springs has evaluated schools, homeowners and businesses as target audiences that are likely to have significant stormwater impacts.

Table 7: Summary of Target Pollutants and Sources

Target Pollutant(s)	Likely Source(s)/Target Audience(s)	SWMP Program Addressing Target Pollutant(s)/Audience(s)
Sediment	Residents Landscape Contractors Builders Developers HOAs	Public Education and Outreach Public Involvement Erosion Control
Nutrients	Landscape Contractors Builders Developers Town Staff Restaurants Residents Pet Owners	Public Education and Outreach Public Involvement Post Construction

	HOAs Property managers	
Hydrocarbons	Automotive facilities Town Staff Residents HOAs Property Managers	Public Education and Outreach Public Involvement IDDE Good Housekeeping
Sewage/Septic	Residents Town Staff Developers Builders Property Managers HOAs	Public Education and Outreach Public Involvement IDDE Good Housekeeping
Litter/Debris	School age Residents Builders Developers Solid Waste Property Managers	Public Education and Outreach Public Involvement Erosion Control Good Housekeeping
Chemicals	Residents Landscape Contractors Builders Developers Businesses Property Managers	Public Education and Outreach Public Involvement IDDE

PART 4: STORMWATER MANAGEMENT PROGRAM ADMINISTRATION

4.1 Organizational Structure

The Town of Holly Springs Stormwater Program is implemented by multiple Town departments, with the Utilities and Infrastructure (U&I) Division being responsible for administration. U&I Environmental Services Division is responsible for Public Education and Outreach, Public Involvement, Post-Construction Stormwater Management, Illicit Discharge and Elimination and Construction Site runoff Controls. U&I Public Works Division is responsible for good housekeeping and municipal pollution prevention activities and storm drainage maintenance. The Environmental Control Supervisor is designated as the Stormwater Program Administrator.

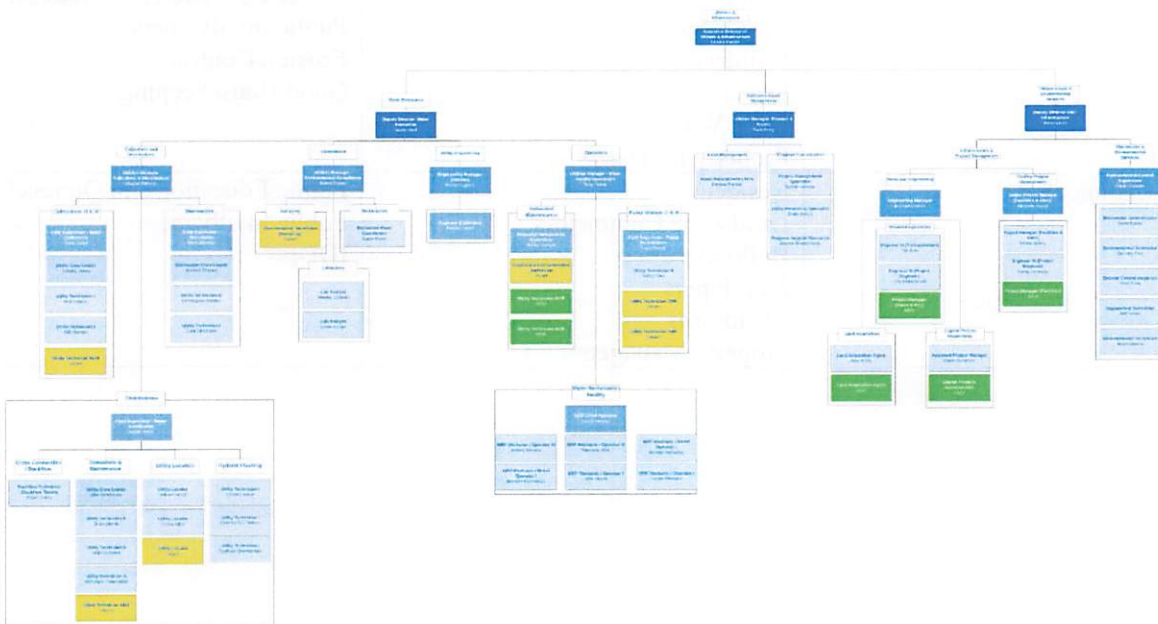


Table 8: Summary of Responsible Parties

SWMP Component	Responsible Position	Staff Name	Department
Stormwater Program Administration	Supervisor - Environmental Control	Daniel Colavito	Utilities & Infrastructure
SWMP Management	Supervisor - Environmental Control	Daniel Colavito	Utilities & Infrastructure

Public Education & Outreach	Environmental Technician	Zack Pitts	Utilities & Infrastructure
Public Involvement & Participation	Environmental Technician	Zack Pitts	Utilities & Infrastructure
Illicit Discharge Detection & Elimination	Environmental Technician	Zack Pitts	Utilities & Infrastructure
Construction Site Runoff Control	Erosion Control Inspector	Mark Tutor, Jeff Peters Austin Deans	Utilities & Infrastructure
Post-Construction Stormwater Management	Environmental Technician	Zack Pitts	Utilities & Infrastructure
Pollution Prevention/Good Housekeeping for Municipal Operations	Environmental Technician Public Works Technician Parks and Recreation Technician	Zack Pitts (U&I) Deon Johnson (U&I) Taylor Jackson (P&R)	Utilities & Infrastructure Parks and Recreation
Municipal Facilities Operation & Maintenance Program	Environmental Technician Manager - Facilities Maintenance Director - Parks & Recreation	Zack Pitts (U&I) Joseph Conigliaro (FM) LeeAnn Plumer (P&R)	Utilities & Infrastructure (U&I) Facilities Maintenance (FM) Parks and Recreation (P&R)
Spill Response Program	Environmental Technician Fire Department Supervisor	Zack Pitts (U&I) Hunter Byars (FD)	Utilities & Infrastructure Fire Department
MS4 Operation & Maintenance Program	Stormwater Administrator	Darin Eyster	Utilities & Infrastructure
Municipal SCM Operation & Maintenance Program	Environmental Technician	Zack Pitts	Utilities & Infrastructure
Pesticide, Herbicide & Fertilizer Management Program	Director - Parks & Recreation	LeeAnn Plumer	Parks and Recreation
Vehicle & Equipment Cleaning Program	Manager - Fleet	Justin Reasoner	Public Works

Pavement Management Program	Manager - Streets & Concrete	Melissa Harden	Public Works
Total Maximum Daily Load (TMDL) Requirements	n/a	n/a	n/a

4.2 Program Funding and Budget

In accordance with the issued permit, the Town of Holly Springs 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 has a Stormwater Utility Fee that adequately funds the needs for NPDES PH. II permit programmatic elements, as well as providing an avenue for capital improvement projects and maintenance of the Town's storm drainage network. The stormwater program is currently funded at approximately \$1.2 million per year, with an increase in revenue expected, in proportion with population growth. The fee for residents is \$5.20 per month, with commercial properties being charged this fee on an Equivalent Residential Unit (ERU) basis.

4.3 Shared Responsibility

The Town of Holly Springs 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 Holly Springs 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 Holly Springs nor the other entity fully performs the permit obligation. Table 9 below summarizes who will be implementing the component, what the component program is called, the specific SWMP BMP or permit requirement that is being met by the shared responsibility, and whether or not a legal agreement to share responsibility is in place.

Table 9: Shared Responsibilities

SWMP BMP or Permit Requirement	Implementing Entity & Program Name	Legal Agreement (Y/N)
Permit Section B	Central Pines Regional Council (CPRC), Clean Water Education Partnership (CWEP)	Y

4.4 Co-Permittees

There are no other entities applying for co-permittee status under the NPDES MS4 permit number NCS000495 for the Town of Holly Springs. Table 10 summarizes contact information for each co-permittee.

Table 10: Co-Permittee Contact Information

Co-Permittee MS4 Name	Contact Person	Phone & E-Mail	Interlocal Agreement (Y/N)
n/a	n/a	n/a	n/a

4.5 Measurable Goals for Program Administration

The Town of Holly Springs 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.	2.1.1: Program Implementation Maintain adequate funding and staffing to implement and manage the provisions of the SWMP and meet all requirements of this permit.			
1	Program Implementation			
	Evaluate the funding and staffing necessary to adequately implement program components	1. Prepare, conduct and document an annual evaluation program funding and staffing	1. Annually	1. Adequate/Inadequate
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
2	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.	2. Prepare, conduct and document an annual evaluation of the program components..	1. Annually	1. Yes/No

Table 11: Program Administration BMPs

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
3	Permit Renewal Application			
	Submit a permit renewal application and Draft SWMP no later than 180 prior to permit expiration.	1. Draft SWMP applicable to the proceeding 5 years following permit re-issuance.	1. Permit Year 5	1. Yes/No
		2. Certify the stormwater permit renewal application (Permit renewal application form and Draft SWMP for the next 5-year permit cycle) and submit to NCDEQ at least 180 days prior to permit expiration.	2. Permit Year 5	2. Date of permit renewal application submittal
Permit Ref.	2.2.2: Minimum Control Measures 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.			
4	Minimum Control Measures			
	Written procedures for implementing each of the six minimum control measures.	1. Create written procedures for implementing each of the six minimum control measures	1. Permit Year 1	1. Yes/ No
		2. Review and update, as needed, written procedures for implementing each of the six minimum control measures	2. Permit Years 2-5	2. Yes/No

PART 5: PUBLIC EDUCATION AND OUTREACH PROGRAM

The Town of Holly Springs will implement a Public Education and Outreach Program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and steps the public can take to reduce pollutants in storm water runoff.

The target audiences and identified pollutants listed in Part 3.9 of this SWMP, which will be addressed by the Public Education and Outreach Program, are summarized in Table 12 below. In addition, the Town of Holly Springs 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	General Public, Businesses, Municipal Employees
Yard Waste	General Public, landscape contractors
Sediment	General Public, Construction, Businesses, Municipal Employees
Nutrients	General Public, Businesses, Municipal Employees
Pet Waste/Fecal Coliform	General Public, HOA's, Municipal Employees
Illicit Discharges	General Public, Businesses, Municipal Employees
Illegal Dumping	General Public, Businesses, Municipal Employees
Improper Disposal of Waste	General Public, Businesses, Municipal Employees
General nonpoint source pollution	General Public, Businesses, Municipal Employees

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

Table 13: Public Education and Outreach BMPs

BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
5	Develop Multiyear Communications Plan			

Table 13: Public Education and Outreach BMPs

	Prepare multiyear communications plan. Include in Plan the BMPs, type of media, schedule, targeted audiences, messages, strategies, activities, and measurable goals. Summarize plan, track information provided and target audiences associated with implementation of the plan annually.	1. Update Communication Plan	1. Annually	1. Provide link/copy of communication plan
6	Information for Residents			
	Utilize Communications and Marketing (C&M) Department to distribute outreach material on Social Media and other distribution sources.	1. Select and send outreach material to C&M for distribution on various platforms	1. Annually	1. Report total number of posts annually
7	Presentations for Schools			
	Maintain and develop age-specific educational information for use in schools and for presentations to school age children based on the statewide curriculum.	1. Attempt to schedule at least 2 presentations at local schools	1. Annually	1. Number of students present
8	Festivals and Events			
	Participate in local festivals annually by staffing a booth. Provide messages on the importance of clean water and on specific activities that can be carried out to help keep stormwater clean. Events may include but are not necessarily limited to the Town's annual TurtleFest and HollyFest.	1. Participate in a minimum of 3 events per year	1. Annually	1. Number of events attended
9	Business Outreach Program			
	Coordinate with the Town's Economic Development Department and Public Works Department to develop and provide information for businesses on targeted pollutants	1. Distribute literature for targeted pollutants to relevant businesses	1. Annually	1. Number of businesses targeted
10	Mass Media Campaign			
	Continue participation with Central Pines Regional Council (CPRC)	1. Participate in quarterly meetings	1. Quarterly	1. Yes/No

Table 13: Public Education and Outreach BMPs

	Clean Water Education Partnership (CWEP) to develop mass media campaign messages for use on regional TV stations, local government cable channel, and regional radio in both (English and Spanish).	2. Monitor/assess program to ensure partnership commitments are met	2. Annually	2. Yes/No
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
11	Stormwater Page on Town Website			
	The webpage will provide information on the Town’s Stormwater Program and other applicable water quality programs; including the Permit, SWMP, applicable ordinances, links to other information sources, information for homeowners, residents and developers. Webpage will include links to forms, documents and citizen reporting mechanism	1. Update website as needed for links, contact information, forms, regulations, etc	1. Continuous	1. Yes/No
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
12	Stormwater Hotline			
	A hotline phone number and email address will be maintained for citizens inquiries regarding Stormwater rules, regulations or program and to report stormwater issues or violations	1. Include Hotline information on Stormwater Website, promotional giveaways, literature, etc.	1. Continuous	1. Number of calls/emails received on the Stormwater Hotline

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 Holly Springs 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
13	In Person Contact at Outreach Events			
	Participate in local festivals annually by staffing a booth. Provide mechanism for public input and feedback	1. Participate in a minimum of 3 events per year	1. Annually	1. Number of events attended
14	Stormwater Webpage			
	The webpage will provide information on the Town's Stormwater Program that includes mechanism for public input and feedback	1. Update website as needed for links, contact information, forms, regulations, etc.	1. Continuous	1. Yes/No
15	Stormwater Hotline			
	A hotline phone number and email address will be maintained for citizens inquiries and as a mechanism for public input and feedback	1. Include Hotline information on Stormwater Website, promotional giveaways, literature, etc.	1. Continuous	1. Number of calls/emails received on the Stormwater Hotline
Permit Ref.	3.3.2: Volunteer Opportunities Measures to provide volunteer opportunities designed to promote ongoing citizen participation.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
16	Litter Cleanups			
	Coordinate across Town departments to identify cleanup locations, provide materials and facilitate cleanup events in public areas with potential to pollute stormwater	1. Coordinate 1 litter cleanup	1. Annually	1. Number of participants
17	Dog Waste Signage Program			

Table 14: Public Involvement and Participation BMPs				
	Provide Signage to communities and Town departments for installation on Dog Waste disposal stations.	1. Provide signage for pet waste stations	1. Annually	1. Report number of Dog Waste signs distributed
18	Student Volunteer/Internship Opportunities			
	Provide opportunities for students/interns to participate in events and work within the Program	1. Facilitate student/intern opportunities	1. Annually	1. Student/Intern hours

PART 7: ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM

The Town of Holly Springs 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
19	Stormwater Infrastructure Inventory			
	Maintain MS4 Map showing storm drain network, flow direction, outfalls and receiving waters.	1. Maintain map	1. Continuous	1. Yes/No
20	IDDE “Hot Spots” Map			
	Maintain a map showing areas identified as historical or ongoing “hot spot” areas of IDDE compliance issues.	1. Maintain map	1. Annually	1. 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	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
21	Legal Authority			

Table 15: Illicit Discharge Detection and Elimination BMPs

	Amend when needed existing ordinance on illicit detection, right of entry, prohibition of certain discharges, enforcement actions and penalties for dumping, spills, and willful illicit connections.	1. Review Ordinance	1. Annually	1. Report date of review
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. 			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
22	Outfall Inspections			
	Perform regular screenings during dry weather conditions (i.e., hasn't rained in 72 hours) and test flows found at discharge points where possible illicit discharges are suspected on an as needed basis.	1. Inspect 20% of major outfalls	1. Annually	1. Report percentage of outfalls inspected
23	Illicit Discharge Investigation and Enforcement Process and Procedures			
	SOP documenting process and procedure for investigation and enforcement of potential IDDE violations	1. Review and update SOP	1. Annually	1. Yes/No
24	Annual IDDE Program Evaluation			
	Conduct annual review of program. Update program components as needed	1. Review program	1. Annually	1. Yes/No
Permit Ref.	<p>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.</p>			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric

Table 15: Illicit Discharge Detection and Elimination BMPs

25	Software Tracking System			
	Maintain a database tracking system for tracking citizen complaints and requests and referrals from other departments/staff	1. Utilize software to log and track potential IDDE violations received from citizens or referrals from other Town departments or staff	1. Continuous	1. Number of complaints/referrals received
Permit Ref.	3.4.5: Staff IDDE Training 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.			
BMP No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
26	Staff Training Program			
	Staff Training program to cross train Town Staff to identify and report potential IDDE violations encountered in performance of their primary duties	1. Conduct Town staff training	1. Annually	1. Number of Town Staff Trained
Permit Ref.	3.4.6: IDDE Reporting Measures for the public and staff to report illicit discharges, illegal dumping and spills. The mechanism shall be publicized to facilitate reporting and shall be managed to provide rapid response by appropriately trained personnel.			
BMP No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
27	Stormwater Hotline			
	Maintain a hotline for public to report IDDE issues	1. Maintain hotline phone number and website reporting mechanism	1. Continuous	1. Yes/No
28	Stormwater Page on Town Website			
	Maintain webpage with stormwater information regarding IDDE and reporting mechanisms	1. Maintain webpage	1. Continuous	1. Yes/No

PART 8: CONSTRUCTION SITE RUNOFF CONTROL PROGRAM

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

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

Permit Reference	State or Local Program Name	Legal Authority	Implementing Entity	Meets Whole or Part of Requirement
3.5.1 - 3.5.4	Town of Holly Springs Delegated SPCA Program*	15A NCAC Chapter 04	Town of Holly Springs	Whole

* The local delegated SPCA Program ordinance(s)/regulatory mechanism(s) can be found at: https://library.municode.com/nc/holly_springs/codes/code_of_ordinances.

The Town of Holly Springs 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
29	Municipal Staff Training			
	Train municipal staff who receive calls from the public on the protocols for referral and tracking of construction site runoff control complaints.	1. Train municipal staff on proper handling of construction site runoff control complaints.	1. Annually	1. Number of staff trained
30	Stormwater Page on Town Website			
	Maintain a hotline for public to report construction site runoff issues	1. Maintain hotline phone number and website reporting mechanism	1. Continuously	1. Yes/No
31	Stormwater Hotline			

Table 17: Construction Site Runoff Control BMPs

	Maintain webpage with stormwater information regarding construction site runoff and reporting mechanisms	1. Maintain webpage	1. Continuous	1. 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
32	Legal Authority			
	Maintain legal authority and measures to ensure construction site operator awareness of waste management requirements.	1. Review Ordinance	1. Annually	1. Report date of review
33	Pre-construction Meetings			
	Hold a preconstruction meeting prior to issuance of each Land Disturbance Permit for all projects equal to or exceeding 20,000 square feet of disturbed area. Include a portion of the meeting to provide environmental and stormwater education to both the developer and contractors in attendance.	1. Conduct and document meetings	1. Continuous\	1. Number of permits issued/meetings held
34	Inspection Program			
	Maintain a program to review, approve and inspect all construction sites greater than 20,000 square feet of disturbed area to ensure that grading and construction operations comply with the erosion control and sedimentation control ordinance. Verify through onsite inspections that the erosion control measures on the approved plan are properly installed and function as designed. Inspect all single-family residences for Silt Fence and Residential Construction Entrance. Provide quarterly audits of sites and files to verify that the program is being implemented appropriately	1. Document plan reviews	1. Continuous	1. Report number as required by NCDEQ/ State-delegated E&SC Authority
		2. Document approvals/disapprovals	2. Continuous	2. Report number as required by NCDEQ/ State-delegated
		3. Document inspections	3. Continuous	3. Report number as required by NCDEQ/ State-delegated
		4. Document Notices of Violation	4. Continuous	4. Report number as required by NCDEQ/ State-delegated

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 Holly Springs 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 Holly Springs implements the following State post-construction program requirements, which satisfy the NPDES Phase II MS4 post-construction site runoff control requirements as Qualifying Alternative Programs (QAPs) in the MS4 area(s) where they are implemented.

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

State QAP Name	State Requirements	Local Ordinance / Regulatory Mechanism Reference
Neuse River Basin Nutrient Sensitive (NSW) Management Strategy	15A NCAC 2B .0235	Town recently named-implementation currently underway

The NSW program only covers the area of Town jurisdiction which drainages to the Neuse River Basin.

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

Table 19: Summary of Existing Post-Construction Program Elements

Permit Requirements for Plan Review and Approval	Municipal Ordinance/Code Reference(s) and/or Document Title(s)	Date Adopted
3.6.2(a) Authority	Town of Holly Springs Code of Ordinances Chapter 8 Article 5	11-6-2007
3.6.3(a) & 15A NCAC 02H.0153(c) Federal, State & Local Projects		
3.6.3(b) Plan Review	Town of Holly Springs Code of Ordinances Section 8-213	11-6-2007, updated 12-20-2011
3.6.3(c) O&M Agreement	Town of Holly Springs Code of Ordinances Section 8-265	12-20-2011
3.6.3(d) O&M Plan	Town of Holly Springs Code of Ordinances Section 8-265	12-20-2011
3.6.3(e) Deed Restrictions/Covenants	Town of Holly Springs Code of Ordinances Section 8-265	12-20-2011
3.6.3(f) Access Easements	Town of Holly Springs Code of Ordinances Section 8-268	12-20-2011
Permit Requirements for Inspections and Enforcement	Municipal Ordinance/Code Reference(s) and/or Document Title(s)	Date Adopted
3.6.2(b) Documentation	Town of Holly Springs Code of Ordinances Section 8-266	12-20-2011
3.6.2(c) Right of Entry	Town of Holly Springs Code of Ordinances Section 8-261	12-20-2011
3.6.4(a) Pre-CO Inspections		
3.6.4(b) Compliance with Plans		
3.6.4(c) Annual SCM Inspections	Town of Holly Springs Code of Ordinances Section 8-266	12-20-2011
3.6.4(d) Low Density Inspections		
3.6.4(e) Qualified Professional	Town of Holly Springs Code of Ordinances Section 8-266	12-20-2011
Permit Requirements for Fecal Coliform Reduction	Municipal Ordinance/Code Reference(s) and/or Document Title(s)	Date Adopted
3.6.6(a) Pet Waste		
3.6.6(b) On-Site Domestic Wastewater Treatment		

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
35	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. Continuous	1. Number of plan reviews performed for low density and high density.
		2. Track number of low density and high-density plans approved.	2. Continuous	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. Continuous	3. Summary of number and type of SCMs added to the inventory
		4. Track number of SCM inspections performed.	4. Continuous	4. Number of SCM inspections.
		5. Track number of low-density inspections performed.	5. Continuous	5. Number of low-density projects inspected.
		6. Track number and type of enforcement actions taken.	6. Continuous	6. Number of enforcement actions issued.
Permit Ref.	2.3 and 3.6: Qualifying Alternative Program(s) Measures to develop, implement and enforce additional BMPs in order to comply with the QAP state program requirements.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
36	Neuse (NSW) Local Program and Ordinance			
	Adopt and Implement Neuse (NSW) Local Program and Ordinance	1. Have Local Program approved by DWR and EMC	1. Permit year 1	1. Yes/No
2. Update and adopt ordinance to implement program		2. Permit year 1	2. Yes/No	

Table 20: Post Construction Site Runoff Control BMPs

		3. Implement Program	3. Permit years 1	3. Yes/No
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
37	Maintain Adequate Legal Authority			
	Maintain legal authority and measures to ensure post-construction requirements of NPDES permit and QAP's are met	1. Review Ordinance	1. Annually	1. Report date of review
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
38	Post-construction Sites Runoff Controls			
	Maintain a set of procedures for review and approval of SCMs	1. Maintain existing SOPs and review checklists	1. Continuous	1. Yes/No

Table 20: Post Construction Site Runoff Control BMPs

BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
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.			
39	Construction Requirements			
	Implement platting, development and CO requirements to assure that development and SCMs are constructed to plan	1. Maintain stormwater performance surety requirements	1. Continuous	1. Yes/No
		2. Require as-built drawings, PE Certifications and recorded O&M documents for all approved SCMs	2. Continuous	2. Yes/No
		3. Perform inspections to ensure compliance with the approved plans.	3. Continuous	3. Number of inspections performed
40	Deed Restrictions and Protective Covenants			
	Provide mechanisms such as recorded deed and protective covenants that ensure development activities will maintain the project consistent with the approved plans (easements, access and maintenance agreements, platting of impervious surface restrictions, etc.)	1. Require enforceable deed restrictions as shown of the approved construction drawings with the final plat review.	1. Continuous	1. Yes/No
41	Long Term O&M of SCMs			
	Require SCM owners to submit annual inspection reports and certification by a qualified professional to demonstrate compliance with O&M requirements as recorded for the site.	1. Receive, review and track submitted annual certifications	1. Continuous	1. Number of reports received

Table 20: Post Construction Site Runoff Control BMPs

BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
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.			
42	Pet Waste Management			
	Propose a Pet Waste component to the Town Code of Ordinances and provide associated educational materials.	1. Provide proposed ordinance language to management and governing body for approval and inclusion into Town Ordinance	1. Permit year 2	1. Yes/No
43	Onsite Domestic Wastewater			
	Provide information to citizens regarding domestic wastewater treatment, proper system O&M and provide a reporting mechanism for reporting unmaintained systems.	1. Provide a link to Wake County Septic and Wastewater Management on the Town website	1. Continuous	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 Holly Springs 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 Holly Springs 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
44	Inventory of Municipal Facilities			
	Maintain an up-to-date inventory of municipal facilities with potential to generate polluted runoff.	1. Maintain list of facilities with potential for polluted runoff based on existing Town owned parcels listed in GIS	1. Continuous	1. Number of facilities inventoried
		2. Identify priority areas at each facility	2. Continuously	2. Yes/No
45	Facility Inspections			
	Inspection of Facilities to confirm good housekeeping practices are being followed	1. Inspect high priority facilities annually	1. Annually	1. Number of inspections completed

Table 21: Pollution Prevention and Good Housekeeping BMPs

46	Staff Training Program			
	Implement Staff Training program for general stormwater awareness and implementing pollution prevention and good housekeeping practices	1. Conduct Town Staff Training	1. Annually	1. Number of Town Staff Trained
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
47	Inventory of Facilities with Spill Potential			
	Maintain list of facilities and operations with spill potential and the need for spill response procedures	1. Identify facilities with spill potential	1. Annually	1. number of facilities with spill potential
48	Spill Response Procedures			
	Maintain spill response procedures and continue training of appropriate staff	1. Review Spill response procedures	1. Annually	1. Yes/No
		2. Conduct Town Staff Training	2. Annually	2. Number of Town Staff Trained
Permit Ref.	3.7.3: MS4 Operation and Maintenance Program Measures to minimize pollutants in the stormwater collection system. The permittee shall provide operation and maintenance staff training on stormwater awareness and pollution prevention, perform MS4 inspections, maintain the collection system including catch basins and conveyances; and establish specific frequencies, schedules, and standard documentation.			
BMP No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
49	Staff Training			
	Implement Staff Training program for stormwater awareness and pollution prevention, performing MS4 inspections, maintaining the collection system including catch basins and conveyances	1. Conduct Town Staff Training	1. Annually	1. Number of Town Staff Trained
50	MS4 System Inspections and Maintenance			
	Conduct inspections and maintenance on collection system including catch basins and conveyances	1. Develop inspection criteria	1. Permit year 1	1. Yes/No
		2. Perform MS4 inspections	2. Continuous	2. Report number of inspections conducted

Table 21: Pollution Prevention and Good Housekeeping BMPs

		3. Develop tracking system to help identify "hot spots" for system maintenance	3. Permit year 3	3. 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 Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
51	Inventory of Municipal Structural SCMs			
	Maintain an inventory of municipally owned structural SCM's	1. Maintain inventory of Town owned SCMs	1. Continuous	1. Report number of Town owned SCMs
52	SCM Inspections and Maintenance			
	Performance and documentation of regular inspection and maintenance activities on Town owned SCMs	1. Perform routine maintenance on Town owned SCMs	1. As Needed	1. Report number maintenance activities
		2. Perform annual operation certification on Town owned SCMs	2. Annually	2. Report number of SCMs certified
Permit Ref.	3.7.5: Pesticide, Herbicide and Fertilizer Management Program Measures to minimize water quality impacts from the use of landscape chemicals. The permittee shall provide routine pollution prevention and chemical use, storage and handling training, and shall ensure compliance with permits and applicator certifications.			
BMP No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
53	Pesticide, Herbicide and Fertilizer Applicator Training			
	Ensure staff who apply landscape chemicals are properly trained and certified in order to minimize water quality impacts from pesticides, herbicides and fertilizers.	1. Maintain applicator training licenses/certifications	1. Continuous	1. Report number of staff members certified
		2. Maintain SWPP/SOP for storage, handling, use and spill response	2. Annually	2. Yes/No
Permit Ref.	3.7.6: Vehicle and Equipment Maintenance Program Measures to prevent and minimize contamination of stormwater runoff from areas used for municipal vehicle and equipment maintenance and/or cleaning. The permittee shall ensure that municipal industrial facilities subject to NPDES industrial permitting comply with those permit requirements, provide routine pollution prevention training to staff, perform routine inspections, and establish specific frequencies, schedules, and documentation.			
BMP No.	A Description of BMP	B Measurable Goal(s)	C Schedule for Implementation	D Annual Reporting Metric
54	Vehicle and Equipment Cleaning and Maintenance Facility Inspection			

Table 21: Pollution Prevention and Good Housekeeping BMPs

	Inspection of vehicle and equipment maintenance areas to confirm good housekeeping practices are being followed	1. Inspect vehicle and equipment maintenance areas	1. Annually	1. Number of inspections completed
Permit Ref.	3.7.7: Pavement Management Program Measures to reduce pollutants in stormwater runoff from municipally-owned streets, roads, and parking lots within the permittee's corporate limits. The permittee shall implement measures to control litter, leaves, debris, particulate and fluid pollutants associated with vehicles, and establish specific frequencies, schedules, and documentation.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
55	Street Sweeping			
	Street sweeping following a regular schedule in order to reduce pollutants from Town owned and maintained streets	1. Maintain street sweeping schedule	1. Continuous	1. Miles of street swept
56	Yard Waste Collection			
	Periodic collection of yard waste to reduce pollutants and clogging of storm system	1. Maintain yard waste collection schedule	1. Continuous	1. Yes/No