

**Final Stormwater Management Plan**  
**City of Trinity**  
**NCS000502**

November 14, 2023



## Table of Contents

PART 1: INTRODUCTION .....	1
PART 2: CERTIFICATION .....	2
PART 3: MS4 INFORMATION.....	3
3.1 Permitted MS4 Area .....	3
3.2 Existing MS4 Mapping.....	3
3.3 Receiving Waters.....	4
3.4 MS4 Interconnection.....	5
3.5 Total Maximum Daily Loads (TMDLs) .....	5
3.6 Endangered and Threatened Species and Critical Habitat .....	6
3.7 Industrial Facility Discharges .....	6
3.8 Non-Stormwater Discharges .....	6
3.9 Target Pollutants and Sources.....	8
PART 4: STORMWATER MANAGEMENT PROGRAM ADMINISTRATION.....	9
4.1 Organizational Structure .....	9
4.2 Program Funding and Budget .....	11
4.3 Shared Responsibility .....	11
4.4 Co-Permittees.....	11
4.5 Measurable Goals for Program Administration .....	12
PART 5: PUBLIC EDUCATION AND OUTREACH PROGRAM.....	14
PART 6: PUBLIC INVOLVEMENT AND PARTICIPATION PROGRAM.....	17
PART 7: ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM.....	19
PART 8: CONSTRUCTION SITE RUNOFF CONTROL PROGRAM .....	23
PART 9: POST-CONSTRUCTION SITE RUNOFF CONTROL PROGRAM .....	24
PART 10: POLLUTION PREVENTION AND GOOD HOUSEKEEPING PROGRAMS.....	29

## **List of Tables**

- Table 1: Summary of MS4 Mapping
- Table 2: Summary of MS4 Receiving Waters
- Table 3: Summary of Approved TMDLs
- Table 4: Summary of Federally Listed Species/Habitat Impacted by Surface Water Quality
- Table 5: NPDES Stormwater Permitted Industrial Facilities
- Table 6: Non-Stormwater Discharges
- Table 7: Summary of Target Pollutants and Sources
- Table 8: Summary of Responsible Parties
- Table 9: Shared Responsibilities
- Table 10: Co-Permittee Contact Information
- Table 11: Program Administration BMPs
- Table 12: Summary of Target Pollutants & Audiences
- Table 13: Public Education and Outreach BMPs
- Table 14: Public Involvement and Participation BMPs
- Table 15: Illicit Discharge Detection and Elimination BMPs
- Table 16: Qualifying Alternative Program Components for Construction Site Runoff Control Program
- Table 17: Construction Site Runoff Control BMPs
- Table 18: Qualifying Alternative Program(s) for Post-Construction Site Runoff Control Program
- Table 19: Summary of Existing Post-Construction Program Elements
- Table 20: Post Construction Site Runoff Control BMPs
- Table 21: Pollution Prevention and Good Housekeeping BMPs

## **PART 1: INTRODUCTION**

The purpose of this Stormwater Management Plan (SWMP) is to establish and define the means by which the City of Trinity 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 Trinity 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 NCS000502, 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 Trinity and located within the corporate limits of the City of Trinity.

In preparing this SWMP, the City of Trinity 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*):

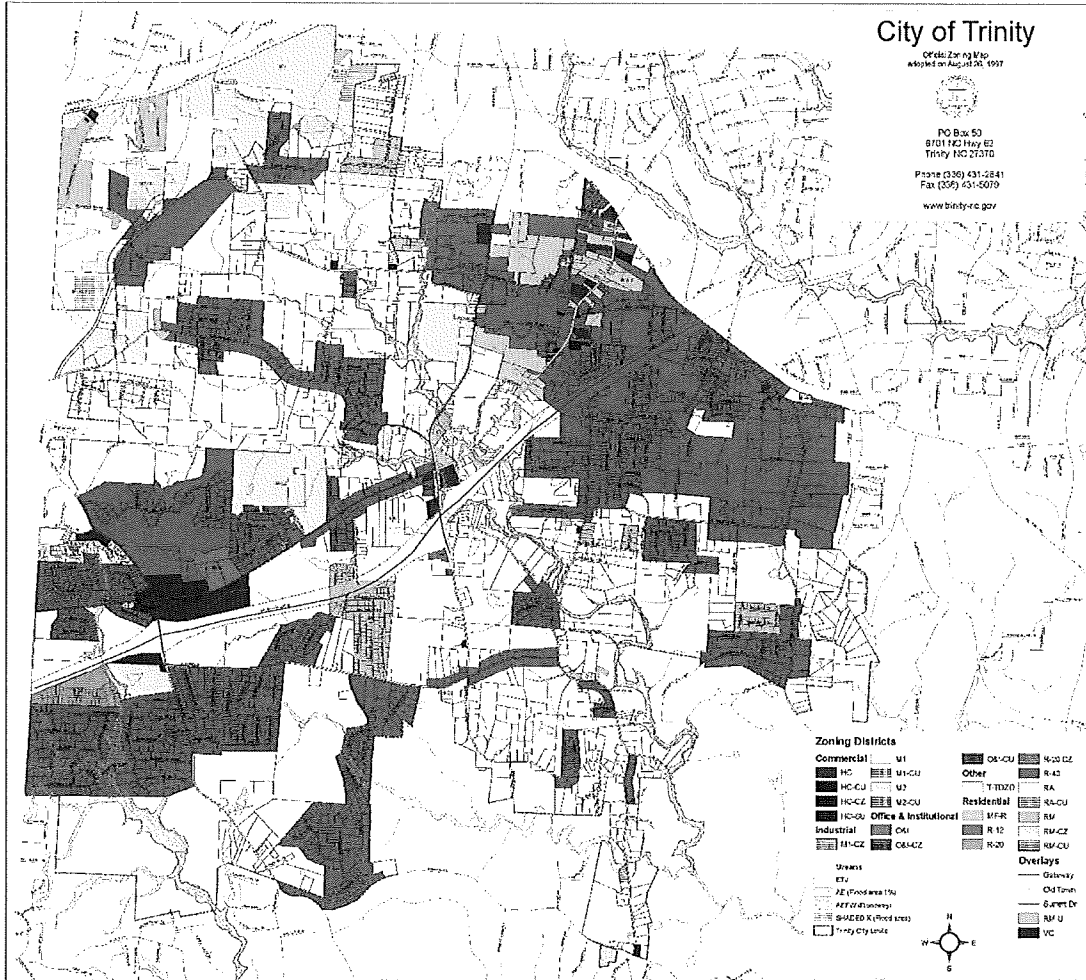
- A specific individual having overall responsibility for stormwater matters.
- A specific position having overall responsibility for stormwater matters.

<i>Signature:</i>	<i>Steve L. Cox</i>
<i>Print Name:</i>	<i>Steve L. Cox</i>
<i>Title:</i>	<i>City Manager - Trinity, North Carolina</i>
Signed this <i>17</i> day of <i>23</i> of <i>November 17, 2023</i>	

## PART 3: MS4 INFORMATION

### 3.1 Permitted MS4 Area

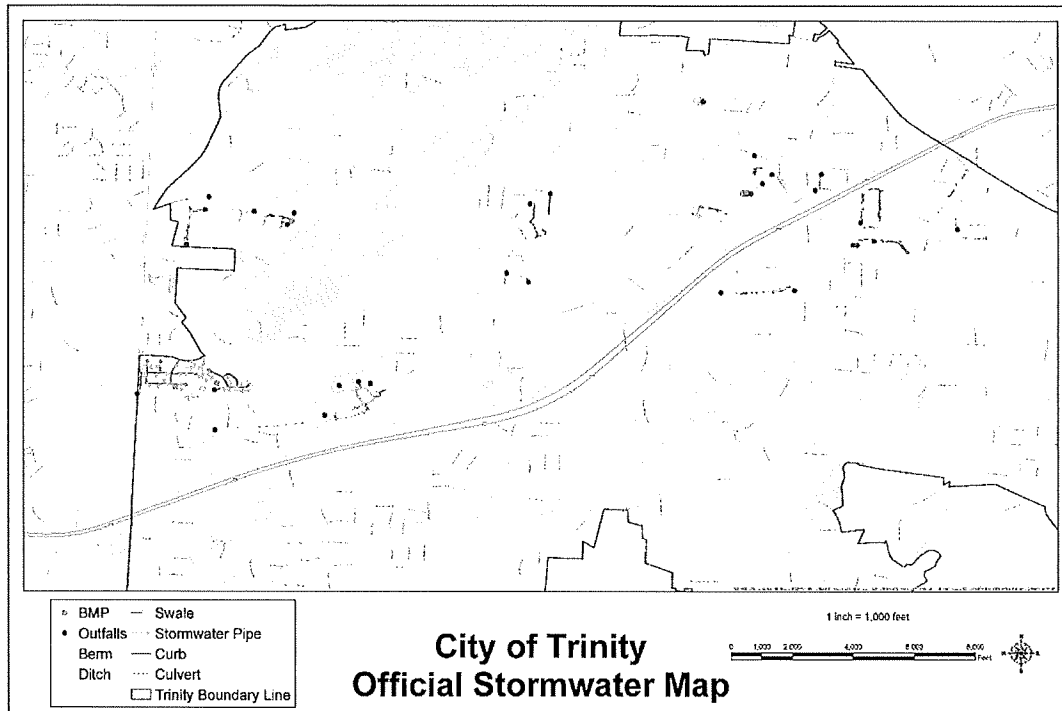
This SWMP applies throughout the corporate limits of the City of Trinity, including all regulated activities associated with the discharge of stormwater from the MS4. The map below shows the corporate limits of the City of Trinity as of the date of this document.



### 3.2 Existing MS4 Mapping

The current MS4 mapping includes location of storm structures, depth, type, and flow direction. Location of all outfalls is underway. The map is available to the public at the following address:

<https://www.trinity-nc.gov/public-works/page/stormwater-map>



**Table 1: Summary of Current MS4 Mapping**

<b>Percent of MS4 Area Mapped</b>	43	%
<b>No. of Major Outfalls* Mapped</b>	30	<b>Total</b>

*\*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.*

The City is in the process of updating its MS4 map, with an illicit discharge BMP to address the data gaps.

### 3.3 Receiving Waters

The City of Trinity 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
Uwharrie River	13-2-(0.5)	WS-III	
Little Uwharrie River	13-2-1	WS-III	
North Hamby Creek	12-119-7-4-1	C	Benthos (Nar, AL, FW)
Hunts Fork	12-119-7-3	C	Benthos (Nar, AL, FW)

C – Class C (fishable/swimmable waters)

WS III – Water Supply Watershed III

Benthos (Nar, AL, FW) – Narrative standard, aquatic life, fresh waters

**3.4 MS4 Interconnection**

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

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

**3.5 Total Maximum Daily Loads (TMDLs)**

The TMDL(s) listed in Table 3 below have been approved within the MS4 area, as determined by the map and list provided on the [NCDEQ Modeling & Assessment Unit web page](#). The table also indicates whether the approved TMDL has a specific stormwater Waste Load Allocation (WLA) for any watershed directly receiving discharges from the permitted MS4, and whether a Water Quality Recovery Program has been implemented to address the WLA.

**Table 3: Summary of Approved TMDLs**

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

No TMDLs have been approved within the MS4 area. The Statewide TMDL for mercury does not require any actions by the NPDES stormwater permittee because most mercury in stormwater comes from atmospheric deposition.



### 3.6 Endangered and Threatened Species and Critical Habitat

Significant populations of threatened or endangered species and/or critical habitat are identified within the regulated MS4 urbanized area. Based upon a review of the Endangered and Threatened Species and Species of Concern by County for North Carolina Map and Listed species believed to be known 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
Danaus plexippus	Monarch butterfly	Invertebrate	Candidate
Fusconaia masoni	Atlantic pigtoe	Invertebrate	Threatened
Helianthus schweinitzii	Schweinitz's sunflower	Vascular Plant	Endangered
Notropis mekistocholas	Cape Fear shiner	Vertebrate	Endangered
Perimyotis subflavus	Tricolored Bat	Mammal	Proposed Endangered
Symphytotrichum georgianum	Georgia aster	Vascular Plant	Candidate

### 3.7 Industrial Facility Discharges

The City of Trinity 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
NCG100140	Guil-Rand Auto Salvage
NCS0001333	Jowat Corporation
NCGNE0700	Trinity Furniture
NCGNE0291	Novamelt Americas
NCGNC1295	Henkel Corporation

### 3.8 Non-Stormwater Discharges

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

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 Trinity to determine whether they may significantly impact water quality. The City utilizes Public Education and Outreach and Pollution Prevention and Good Housekeeping BMPs to educate residents and municipal staff on the possible effects of detergents entering the surface waters.

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 City of Trinity.

**Table 6: Non-Stormwater Discharges**

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

### 3.9 Target Pollutants and Sources

In addition to those target pollutants identified above, the City of Trinity 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 City of Trinity 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**

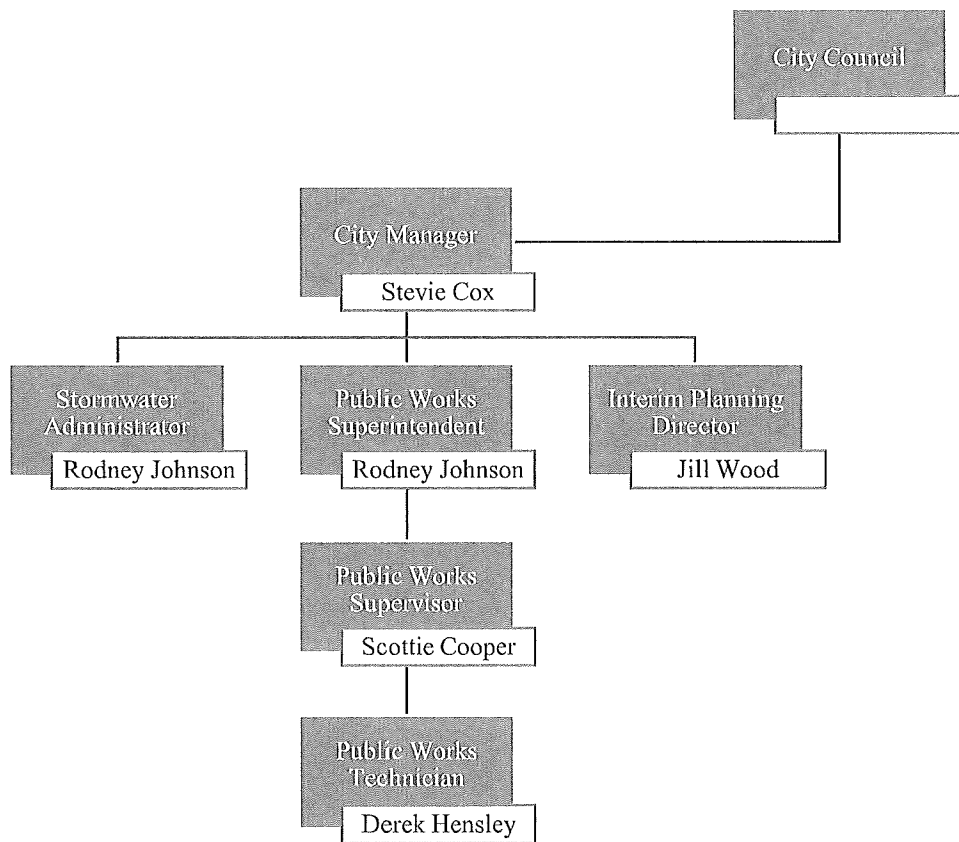
<b>Target Pollutant(s)</b>	<b>Likely Source(s)/ Target Audience(s)</b>	<b>SWMP Program Addressing Target Pollutant(s)/Audience(s)</b>
Litter	Residential, Commercial, Schools	Public Education & Outreach, Public Involvement & Participation
Non-Stormwater Car Washing	Residential, Commercial, Schools	Public Education & Outreach, Public Involvement & Participation
Street Wash Water, Municipal Pollutants	Municipal Operations	Pollution Prevention and Good Housekeeping
Sediment	Construction, Commercial, Municipal Operations	Public Education & Outreach, Construction Site Runoff Control, Post-Construction Site Runoff Control, Pollution Prevention and Good Housekeeping
Fecal Coliform	Sewer Leak, Failing Septic Systems, Pet Waste	Public Education & Outreach, Illicit Discharge Detection and Elimination
Illicit Discharge/Illegal Dumping/Improper Disposal of Waste	Residential, Commercial, Industrial, Municipal Operations	Public Education & Outreach, Public Involvement & Participation, Illicit Discharge Detection and Elimination, Pollution Prevention and Good Housekeeping

**PART 4: STORMWATER MANAGEMENT PROGRAM ADMINISTRATION**

**4.1 Organizational Structure**

The City of Trinity Stormwater Program is implemented by the Stormwater Administrator and through the Public Services Department, both overseen by the City Manager.

**City of Trinity  
Stormwater Management System  
Organization Chart**



**Table 8: Summary of Responsible Parties**

<b>SWMP Component</b>	<b>Responsible Position</b>	<b>Staff Name</b>	<b>Department</b>
Stormwater Program Administration	Stormwater Administrator	Rodney Johnson	Public Works
SWMP Management	Stormwater Administrator	Rodney Johnson	Public Works
Public Education & Outreach	Stormwater Administrator	Rodney Johnson	Public Works
Public Involvement & Participation	Stormwater Administrator	Rodney Johnson	Public Works
Illicit Discharge Detection & Elimination	Public Works Superintendent	Rodney Johnson	Public Works
Construction Site Runoff Control	NCDEQ	NCDEQ	NCDEQ
Post-Construction Stormwater Management	Planning and Zoning Director	Jill Wood	Planning and Zoning
Pollution Prevention/Good Housekeeping	Stormwater Administrator	Rodney Johnson	Public Works
Municipal Facilities Operation & Maintenance Program	Stormwater Administrator	Rodney Johnson	Public Works
Spill Response Program	Fire Chief	Michael Johnson	Fire
MS4 Operation & Maintenance Program	Stormwater Administrator	Rodney Johnson	Public Works
Municipal SCM Operation & Maintenance Program	Stormwater Administrator	Rodney Johnson	Public Works
Pesticide, Herbicide & Fertilizer Management Program	Stormwater Administrator	Rodney Johnson	Public Works
Vehicle & Equipment Cleaning Program	Stormwater Administrator	Rodney Johnson	Public Works
Pavement Management Program	Stormwater Administrator	Rodney Johnson	Public Works
Total Maximum Daily Load (TMDL) Requirements	Stormwater Administrator	Rodney Johnson	Public Works

**4.2 Program Funding and Budget**

In accordance with the issued permit, the City of Trinity 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 administration and compliance fee, which is billed by the Division annually.

The Trinity Stormwater program is funded through the General Fund with an approximate 2023-2024 budget of \$220,490.

**4.3 Shared Responsibility**

The City of Trinity 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 Trinity 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 Trinity 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)
3.2.2 and 3.2.4 Outreach to Target Audiences, 3.3.2 Volunteer Opportunities	Piedmont Triad Regional Council (PTRC)	Y
3.6.5(b) On-Site Domestic Wastewater Treatment	County Health Department	N

**4.4 Co-Permittees**

There are no other entities applying for co-permittee status under the NPDES MS4 permit number NCS000502 for the City of Trinity. 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 Trinity will manage and report the following Best Management Practices (BMPs) for the administration of the Stormwater Management Program.

<b>Table 11: Program Administration BMPs</b>				
<b>Permit Ref.</b>	<b>2.1.2 Program Implementation</b> Measures to evaluate the performance and effectiveness of the SWMP program components at least annually. Results shall be used by the permittee to modify the program components as necessary to accomplish the intent of the Stormwater Program.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
1.	<b>Annual Self-Assessment</b>			
	Evaluate the performance and effectiveness of the program components at least annually. Results shall be used to modify the program components as necessary to accomplish the intent of the Stormwater Program	1. Prepare, conduct and document an annual evaluation of the program components.	1. Annually Permit Years 1 – 5	1. Yes/No
<b>Permit Ref.</b>	<b>1.6: Permit Renewal Application</b> Measures to submit a permit renewal application no later than 180 days prior to the expiration date of the NPDES MS4 permit.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
2.	<b>Permit Renewal Application</b>			
	Submit a permit renewal application and Draft SWMP no later than 180 prior to permit expiration	1. Draft SWMP applicable to the proceeding 5 years following permit re-issuance.	1. Permit Year 5	1. Yes/No
2. Certify the stormwater permit renewal application (Permit renewal application form and Draft SWMP for the next 5-year permit cycle) and submit to NCDEQ at least 180 days prior to permit expiration.		2. Permit Year 5	2. Date of permit renewal application submittal	

**Table 11: Program Administration BMPs**

<b>Table 11: Program Administration BMPs</b>				
3.	<b>Documentation</b>			
	Evaluate existing documentation methods to determine the best way to document implementation of all BMPs for annual reporting (e.g. Excel spreadsheets). Create written procedures for each minimum control measure that account for documentation method and review annually to determine if method is sufficient for tracking all BMPs	1. Review existing documentation methods to determine if all reporting metrics in the SWMP are included	1. Permit Year 1	1. Yes/No
		2. Create written procedures for documentation for each minimum control measure	2. Permit Year 1	2. Yes/No
		3. Review documentation methods and written procedures annually and update if needed	3. Annually – Permit Years 1 – 5	3. Yes/No
4.	<b>Funding Assessment</b>			
	Perform a fiscal analysis and explore options to obtain adequate program funding to support the stormwater program and comply with all requirements of the permit. Implement the chosen mechanism	1. Complete a fiscal gap analysis and evaluate options to fund program	1. Permit Year 1	1. Yes/No; Adequate/Inadequate
		2. Select and implement a funding mechanism	2. Permit Year 2	2. Yes/No



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

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

**Table 12: Summary of Target Pollutants & Audiences**

Target Pollutants/Sources	Target Audience(s)
Litter	Residential, Commercial, Schools
Non-Stormwater Car Washing	Residential, Commercial, Schools, Municipal Operations
Street Wash Water, Municipal Pollutants	Municipal Operations
Sediment	Construction, Commercial, Municipal Operations
Fecal Coliform	Sewer Overflows, Failing Septic Systems, Pet Waste
Illicit Discharge/Illegal Dumping/Improper Disposal of Waste	Residential, Commercial, Industrial, Municipal Operations

The City of Trinity 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.	<b>3.2.2 and 3.2.4: Outreach to Targeted Audiences</b> Measures to identify the specific elements and implementation of a Public Education and Outreach Program to share educational materials to the community or conduct equivalent outreach activities about the impacts of stormwater discharges on water bodies and how the public can reduce pollutants in stormwater runoff. The permittee shall provide educational information to identified target audiences on pollutants/sources identified in Table 12 above, and shall document the extent of exposure of each media, event or activity, including those elements implemented locally or through a cooperative agreement.			
	<b>Partnership with Piedmont Triad Regional Council (PTRC)</b>			
	Continue to engage with PTRC for education and outreach initiatives that will be administered by PTRC under a legal agreement. PTRC currently provides mass media services that include television commercials, radio advertising, newspaper and print ads, brochures and flyers. PTRC also	1. Establish legal agreement with PTRC that meets permit requirements 2. Monitor PTRC activities to ensure partnership commitments are met	1. Permit Year 1  2. Annually – Permit Years 1 – 5	1. Yes/No  2. Yes/No

<b>Table 13: Public Education and Outreach BMPs</b>				
	provides direct education services which include options for library, school, summer camp, farmers market, and other in-person educational events. Target pollutants discussed will include those listed in Tables 7 and 12	3. Review legal agreement to determine if target pollutants or audiences should be revised, or if an alternate program should be created or joined to meet outreach requirements	3. Annually – Permit Years 2 – 5	3. Yes/No
		4. PTRC will provide a minimum of 1 in person educational outreach event, and 1 target pollutant mass media campaign	4. Annually – Permit Years 1 – 5	4. Date of event; Target pollutant campaign topic
	<b>City-Sponsored Events</b>			
6.	Distribute information on stormwater during at least one City-sponsored event (e.g. council meeting, chili cookoff or similar).	1. Develop or identify one informational handout for distribution at the event that covers a target pollutant or vehicle leaks	1. Annually – Permit Years 1 – 5	1. Yes/No
		2. Staff the event/festival chosen and document the number of handouts distributed	2. Annually – Permit Years 1 – 5	2. Number of handouts distributed at the event
<b>Permit Ref.</b>	<b>2.1.7, 3.2.3 and 3.6.5(c): Web Site</b> Measures to provide a web site designed to convey the program’s message(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.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
7.	<b>Stormwater Webpages on City Website</b>			
	Maintain the stormwater webpages on the City website to provide information regarding the stormwater program, MS4 permit requirements, SWMP, applicable ordinances and design standards, hot line phone number, links to state Erosion Control information, and links to PTRC information.	1. Maintain, review, and update the stormwater webpages, check for broken links, and upload new material as needed	1. Annually – Permit Years 1 – 5	1. Date of review and date updated (if required)

**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
8.	<b>Stormwater Hotline</b>			
	A hotline will be maintained for citizens to ask stormwater questions and report stormwater issues. The hotline number will be advertised on the stormwater webpage. The hotline will be maintained by a member of staff who will be trained in general stormwater knowledge, appropriate contacts for stormwater questions, and citizen opportunities within the stormwater program	1. Establish and maintain hotline phone number	1. Permit Year 1	1. Yes/No
		2. Identify and train a responsible party to answer the hotline and direct calls	2. Permit Year 1	2. Date of training and number of staff trained
		3. Track the number and type of calls received and document resolutions of calls	3. Annually – Permit Years 1 – 5	3. Number and type of calls

**PART 6: PUBLIC INVOLVEMENT AND PARTICIPATION PROGRAM**

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

<b>Table 14: Public Involvement and Participation BMPs</b>				
<b>Permit Ref.</b>	<b>3.3.1: Public Input</b> Mechanisms for public involvement that provide for input on stormwater issues and the stormwater program.			
<b>BMP No.</b>	<b>A</b> <b>Description of BMP</b>	<b>B</b> <b>Measurable Goal(s)</b>	<b>C</b> <b>Schedule for Implementation</b>	<b>D</b> <b>Annual Reporting Metric</b>
9.	<b>Stormwater Webpages on City Website</b>			
	Maintain the stormwater webpages on the City website to provide information regarding the stormwater program, MS4 permit requirements, SWMP, applicable ordinances and design standards, hot line phone number, links to state Erosion Control information, and links to PTRC information	1. Maintain, review, and update the stormwater webpages, check for broken links, and upload new materials as needed	1. Annually – Permit Years 1-5	1. Date of review and date updated (if required)
10.	<b>Stormwater Hotline</b>			
	A hotline will be maintained for citizens to ask stormwater questions and report stormwater issues. The hotline number will be advertised on the stormwater webpage. The hotline will be maintained by a member of staff who will be trained in general stormwater knowledge, appropriate contacts for stormwater questions, and citizen opportunities within the stormwater program	1. Establish and maintain hotline phone number	1. Permit Year 1	1. Yes/No
		2. Identify and train a responsible party to answer the hotline and direct calls	2. Permit Year 1	2. Date of training and number of staff trained
3. Track the number and type of calls received and document resolutions of calls		3. Annually – Permit Years 1 – 5	3. Number and type of calls	

**Table 14: Public Involvement and Participation BMPs**

Permit Ref.	<b>3.3.2: Volunteer Opportunities</b> 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
11.	<b>Partnership with PTRC</b>			
	Continue to engage with PTRC for education and outreach initiatives that will be administered by PTRC under a legal agreement. PTRC currently provides television commercials and radio advertising, newspaper and print ads, brochures and flyers, curriculum guides for schools, movie theater ads, and promotional items with a logo. Initiatives will focus on residential, commercial, and school audiences. Target pollutants will include those listed in Tables 7 and 12	1. Establish legal agreement with PTRC that meets permit requirements	1. Permit Year 1	1. Yes/No
		2. Monitor PTRC activities to ensure partnership commitments are met	2. Annually – Permit Years 1-5	2. Yes/No
12.	<b>City-Sponsored Volunteer Opportunities</b>			
	The City will provide one City-sponsored volunteer opportunity (in person or virtually) such as litter/stream cleanups, volunteer monitoring, outfall signage with reporting to the City, or Earth Day activities at least once a year. Residential, commercial, and school audiences will be targeted	1. Develop or identify one volunteer activity that addresses a target pollutant or pollutants	1. Annually – Permit Years 1 – 5	1. Yes/No
		2. Coordinate and host the activity	2. Annually – Permit Years 1 – 5	2. Date and number of participants

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

The City of Trinity 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.

<b>Table 15: Illicit Discharge Detection and Elimination BMPs</b>				
<b>Permit Ref.</b>	<b>3.4.1: MS4 Map</b> Measures to develop, update and maintain a municipal storm sewer system map including stormwater conveyances, flow direction, major outfalls and waters of the United States receiving stormwater discharges.			
<b>BMP No.</b>	<b>A</b> Description of BMP	<b>B</b> Measurable Goal(s)	<b>C</b> Schedule for Implementation	<b>D</b> Annual Reporting Metric
13.	<b>Updates to MS4 Map</b>			
	Continue to update the MS4 map with information including stormwater conveyances (City-owned swales, ditches, and pipes), outfalls, flow direction, and receiving waters. Update the map annually with newly identified or constructed stormwater infrastructure	1. Continue mapping of system to identify all outfalls, conveyances, and flow directions	1. Permit Years 1-5	1. Percent of Trinity mapped and number of outfalls identified
		2. Add receiving waters to the map	2. Permit Year 1	2. Yes/No
		3. Develop process for collecting as-built data and incorporating into the existing map	3. Permit Year 1 and 2	3. Yes/No
		4. When new conveyances/outfalls are located or constructed add them to the map	4. Continually	4. Total number of outfalls
<b>Permit Ref.</b>	<b>3.4.2: Regulatory Mechanism</b> Measures to provide an IDDE ordinance or other regulatory mechanism that provides legal authority to prohibit, detect, and eliminate illicit connections and discharges, illegal dumping and spills into the MS4, including enforcement procedures and actions.			
<b>BMP No.</b>	<b>A</b> Description of BMP	<b>B</b> Measurable Goal(s)	<b>C</b> Schedule for Implementation	<b>D</b> Annual Reporting Metric
14.	<b>Maintain Legal Authority</b>			
	The City’s stormwater ordinance (“Universal Stormwater Management Program Ordinance” for the City of Trinity, NC Article 1: Sec-102) provides legal authority to prohibit, detect, and eliminate illicit connections and discharges, illegal dumping, and spills into the MS4, including enforcement procedures and actions	1. Maintain and review IDDE ordinance, and update as needed	1. Annually	1. Date of review

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

<b>Permit Ref.</b>	<b>3.4.3: IDDE Plan</b>			
	Measures to maintain and implement a written IDDE Plan to detect and address illicit discharges, illegal dumping and any non-stormwater discharges identified as significant contributors of pollutants to the MS4. The plan shall provide standard procedures and documentation to: <ul style="list-style-type: none"> <li>a) Locate priority areas likely to have illicit discharges,</li> <li>b) Conduct routine dry weather outfall inspections,</li> <li>c) Identify illicit discharges and trace sources,</li> <li>d) Eliminate the source(s) of an illicit discharge, and</li> <li>e) Evaluate and assess the IDDE Program.</li> </ul>			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
15.	<b>Maintain IDDE Plan</b>			
	Continue to implement the existing written IDDE Plan. Perform an annual evaluation of IDDE Plan implementation and effectiveness. Review documentation to identify chronic violators/ "hot spots"	1. Review the written IDDE Plan and update as needed	1. Annually – Permit Years 1 – 5	1. Date of review
		2. Review and update IDDE reports and inspections to identify chronic violators, issues, and/or "hot spot" areas according to the criteria identified in the IDDE Plan.	2. Annually – Permit Years 1 – 5	2. Number of chronic violators; Number of hot spots identified
16.	<b>Illicit Discharge Inspections</b>			
	Perform regular dry weather (no precipitation in previous 72 hours) outfall inspections to proactively identify illicit discharges and illicit connections. Conduct illicit discharge detection inspections in response to complaints.	1. Train Public Works on how to perform dry weather outfall inspections and illicit discharge investigations	1. Permit Year 1	1. Training date and number of attendees
		2. Perform inspections of 20% of mapped outfalls as described in the IDDE Plan	2. Annually – Permit Years 1 – 5	2. Percentage of outfalls inspected

**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
<b>3.4.4: IDDE Tracking</b>				
Permit Ref.	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.			
17.	<b>Tracking Spreadsheet</b>			
	A tracking system for observed IDDE violations and follow-on actions will be developed and implemented. The number of potential illicit discharges found, number of illicit discharges verified, number of illicit discharges resolved/removed, number of enforcement actions taken, and number of chronic violators/"hot spots" identified will be tracked	1. Develop a method to track illicit discharges that works for staff availability.	1. Permit Year 1 and 2	1. Yes/No
		1. Track illicit discharges	1. Continuously – Permit Years 1 – 5	1. Number of illicit discharges identified, verified, resolved
<b>3.4.5: Staff IDDE Training</b>				
Permit Ref.	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	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
<b>Staff Training</b>				
18.	Provide training to educate City staff and contractors who may observe an illicit discharge or connection, illegal dumping or spills. Training will include indicators of potential illicit discharges/ connections and illegal dumping and the appropriate avenues through which to report suspected illicit discharge (e.g. reporting violations of construction site runoff to NCDEQ)	1. Identify or develop IDDE training for City staff or contractors	1. Permit Year 1	1. Yes/No
		2. Train staff with potential to discover an illicit discharge during routine work activities	2. Annually – Permit Years 1 – 5	2. Training date and number of attendees



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

Permit Ref.	<b>3.4.6: IDDE Reporting</b> Measures for the public and staff to report illicit discharges, illegal dumping and spills. The mechanism shall be publicized to facilitate reporting and shall be managed to provide rapid response by appropriately trained personnel.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
19.	<b>Stormwater Webpages on City Website</b>			
	Maintain the stormwater webpages on the City website to provide information regarding the stormwater program, MS4 permit requirements, SWMP, applicable ordinances and design standards, hot line phone number, links to state Erosion Control information, and links to PTRC information	1. Maintain, review, and update the stormwater webpages, check for broken links, and upload new materials as needed	1. Annually – Permit Years 1-5	1. Date of review and date updated (if required)
20.	<b>Stormwater Hotline</b>			
	A hotline will be maintained for citizens to ask stormwater questions and report stormwater issues. The hotline number will be advertised on the stormwater webpage. The hotline will be maintained by a member of staff who will be trained in general stormwater knowledge, appropriate contacts for stormwater questions, and citizen opportunities within the stormwater program	1. Establish and maintain hotline phone number	1. Permit Year 1	1. Yes/No
		2. Identify and train a responsible party to answer the hotline and direct calls	2. Permit Year 1	2. Date of training and number of staff trained
3. Track the number and type of calls received and document resolutions of calls		3. Annually – Permit Years 1 – 5	3. Number and type of calls	

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

In accordance with 15A NCAC 02H .0153, the City of Trinity 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
3.5.1 - 3.5.4	State Implemented SPCA Program	15A NCAC Chapter 04	NCDEQ

The City of Trinity also implements the following BMPs to meet NPDES MS4 Permit requirements.

<b>Table 17: Construction Site Runoff Control BMPs</b>				
Permit Ref.	<b>3.5.6: Public Input</b> Measures to provide and promote a means for the public to notify the appropriate authorities of observed erosion and sedimentation problems.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
21.	<b>Stormwater Hotline</b>			
	A hotline will be maintained for citizens to ask stormwater questions and report stormwater issues. The hotline number will be advertised on the stormwater webpage. The hotline will be maintained by a member of staff who will be trained in general stormwater knowledge, appropriate contacts for stormwater questions, and citizen opportunities within the stormwater program	1. Establish and maintain hotline phone number	1. Permit Year 1	1. Yes/No
		2. Identify and train a responsible party to answer the hotline and direct calls	2. Permit Year 1	2. Date of training and number of staff trained
3. Track the number and type of calls received and document resolutions of calls		3. Annually – Permit Years 1 – 5	3. Number and type of calls	

Table 17: Construction Site Runoff Control BMPs				
Permit Ref.	<b>3.5.5: Waste Management</b> Measures to require construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impact to water quality.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
22.	Construction site waste management control is through the State SPCA Program through 15A NCAC Chapter 04			
23.	<b>Municipal Staff Training</b>			
	Train Public Works and other municipal staff who receive calls from the public on the protocols for referral and tracking of construction site runoff control complaints that warrant an illicit discharge investigation.	1. Train staff to know if construction site complaints need to be investigated for IDDE 2. Document the number of complaints investigated	1. Permit Year 1 2. Annually – Permit Years 1 – 5	1. Yes/No 2. Number of complaints investigated

**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 Trinity 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 Trinity 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
Water Supply Watershed (WS-III)	15A NCAC 2B .0620 - .0624	“The Universal Stormwater Management Program Ordinance” for the City of Trinity, NC Article 3: Sec-308
Universal Stormwater Management Program	15A NCAC 2H .1020	“The Universal Stormwater Management Program Ordinance” for the City of Trinity, NC

The City of Trinity 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. USWMPO = Universal Stormwater Management Program Ordinance for the City of Trinity, NC

**Table 19: Summary of Existing Post-Construction Program Elements**

<b>Permit Requirements for Plan Review and Approval</b>	<b>Municipal Ordinance/Code Reference(s) and/or Document Title(s)</b>	<b>Date Adopted</b>
3.6.2(a) Authority	USWMPO Article 1: Sec-102	09/02/2011
3.6.3(a) & 15A NCAC 02H.0153(c) Federal, State & Local Projects	USWMPO Article 2: Sec-204	09/02/2011
3.6.3(b) Plan Review	USWMPO Article 2: Sec-202	09/02/2011
3.6.3(c) O&M Agreement	USWMPO Article 4: Sec-402	09/02/2011
3.6.3(d) O&M Plan	USWMPO Article 4: Sec-403	09/02/2011
3.6.3(e) Deed Restrictions/Covenants	USWMPO Article 4: Sec-405(A)	09/02/2011
3.6.3(f) Access Easements	USWMPO Article 4: Sec-408	09/02/2011
<b>Permit Requirements for Inspections and Enforcement</b>	<b>Municipal Ordinance/Code Reference(s) and/or Document Title(s)</b>	<b>Date Adopted</b>
3.6.2(b) Documentation	USWMPO Article 4: Sec-401, Sec-406	09/02/2011
3.6.2(c) Right of Entry	USWMPO Article 5: Sec-503(B)	09/02/2011
3.6.4(a) Pre-CO Inspections	USWMPO Article 2: Sec-203(D)	09/02/2011
3.6.4(b) Compliance with Plans	USWMPO Article 4: Sec-401, Article 5: Sec-501	09/02/2011
3.6.4(c) Annual SCM Inspections	USWMPO Article 4: Sec-403	09/02/2011
3.6.4(d) Low Density Inspections	See BMP 26	Permit Year 2
3.6.4(e) Qualified Professional	USWMPO Article 3: Sec-305	09/02/2011
<b>Permit Requirements for Fecal Coliform Reduction</b>	<b>Municipal Ordinance/Code Reference(s) and/or Document Title(s)</b>	<b>Date Adopted</b>
3.6.6(a) Pet Waste	USWMPO Article 3: Sec-308(1)(b)	09/02/2011
3.6.6(b) On-Site Domestic Wastewater Treatment	City of Trinity Subdivision Ordinance Article VII: Section 7-4(E)	08/14/2017
	City of Trinity Flood Damage Prevention Ordinance Article 5: Section A(10)	01/02/2008
	NCGS 130A-335(e)	07/01/1982

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

<b>Table 20: Post Construction Site Runoff Control BMPs</b>				
<b>Permit Ref.</b>	<b>3.6.5(a), 3.6.5(b), and 4.1.3: Minimum Post-Construction Reporting Requirements</b> Measures to document activities over the course of the fiscal year (July 1 – June 30) including appropriate information to accurately describe progress, status, and results.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
24.	<b>Standard Reporting</b>			
	Implement standardized tracking, documentation, inspections and reporting mechanisms to compile appropriate data for the annual self-assessment process. Data shall be provided for each Post-Construction/Qualifying Alternative Program being implemented as listed in Tables 18 and 19.	1. Track number of low density and high density plan reviews performed.	1. Continuously Permit Years 1-5	1. Number of plan reviews performed for low density and high density.
		2. Track number of low density and high density plans approved.	2. Continuously Permit Years 1-5	2. Number of plan approvals issued for low density and high density.
		3. Maintain a current inventory of low density projects and constructed SCMs including SCM type or low density acreage, location and last inspection date.	3. Continuously Permit Years 1-5	3. Summary of number and type of SCMs added to the inventory; and number and acreage of low density projects constructed.
		4. Track number of SCM inspections performed.	4. Continuously Permit Years 1-5	4. Number of SCM inspections.
		5. Track number of low density inspections performed.	5. Continuously Permit Years 1-5	5. Number of low density projects inspected.
		6. Track number and type of enforcement actions taken.	6. Continuously Permit Years 1-5	6. Number of enforcement actions issued.
<b>Permit Ref.</b>	<b>2.3 and 3.6: Qualifying Alternative Program(s)</b> Measures to develop, implement and enforce additional BMPs in order to comply with the QAP state program requirements.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
The QAP requirements are fully met by the existing QAP for post-construction, see references provided in Table 18.				

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

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

<b>Permit Ref.</b>	<p><b>3.6.4: Inspections and Enforcement</b>  Measures to maintain inspection and enforcement authority, standards and procedures to: (a) Conduct post-construction inspections prior to issuing a Certificate of Occupancy or a Temporary Certificate of Occupancy. Alternatively, the project owner may provide a surety bond to guarantee compliance with the approved plan(s), (b) Ensure that the project has been constructed in accordance with the approved plan(s), (c) Ensure annual inspection of each permitted SCM to ensure compliance with the approved Operation and Maintenance Agreement, (d) Ensure inspection of low density projects at least once during the permit term, and (e) Require that inspections be conducted by a qualified professional.</p>			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
25.	<b>Revisions to Code of Ordinances</b>			
	Revise existing ordinance to specifically require inspection of low-density projects and continue to require annual SCM inspections	1. Revise code to require 20% inspection of low-density projects at least once during the permit term by a qualified professional 2. Conduct inspection of 20% low-density projects annually and document any follow-up	1. Permit Year 1 and 2  2. Permit Years 2-5	1. Report date adopted and code reference  2. Number of low-density inspections performed
<b>Permit Ref.</b>	<p><b>3.6.6: Fecal Coliform Reduction</b>  Measures to control, to the maximum extent practicable, sources of fecal coliform per 15A NCAC 02H .1017(7). At a minimum, the program shall include: (a) A pet waste management component, which may be achieved by revising an existing litter ordinance, and (b) An on-site domestic wastewater treatment system component, if applicable, which may be coordinated with local county health department, to ensure proper operation and maintenance of such systems.</p>			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
This permit requirement is fully met by the existing post-construction program, see references provided in Table 19.				

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

This SWMP provides a comprehensive pollution prevention and good housekeeping strategy for the City of Trinity municipal facilities and operations. Pollution prevention and good housekeeping (PPGH) 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 Trinity will manage, implement and report the pollution prevention and good housekeeping BMPs as specified in Table 21 below for each required program.

<b>Table 21: Pollution Prevention and Good Housekeeping BMPs</b>				
<b>Permit Ref.</b>	<b>3.7.1: Municipal Facilities Operation and Maintenance Program</b> Measures to manage facilities that are owned and operated by the permittee and have the potential for generating polluted stormwater runoff. The permittee shall maintain a current inventory of municipal facilities; perform facility inspections and routine maintenance; establish specific frequencies, schedules, and standard documentation; provide staff training on general stormwater awareness and implementing pollution prevention and good housekeeping practices.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
	<b>Pollution Prevention and Good Housekeeping (PPGH) Plan Document</b>			
26.	Maintain and implement the PPGH Plan that includes measures for facilities operations and maintenance (O&M), spill response, MS4 O&M, municipal SCM O&M, staff training, vehicle maintenance, and pavement management. Perform inspections for each good housekeeping requirement according to the schedule in the PPGH Plan	1. Review the written PPGH Plan as part of the evaluation of the effectiveness of the program	1. Annually – Permit Years 1 – 5	1. Yes/No
		2. Create municipal facility inventory including stormwater pollution potential	2. Permit Year 1	2. Yes/No



<b>Table 21: Pollution Prevention and Good Housekeeping BMPs</b>				
		3. Perform municipal facility inspections in accordance with the PPGH Plan schedule	3. Annually – Permit Years 1-5	3. Yes/No/Partial; Number of inspections performed
27.	<b>Staff Training</b>			
	Develop or identify a staff training program for general stormwater pollution prevention/spill response/fertilizer training/pavement management and overview of the PPGH plans and provide to appropriate utilities and public works employees	1. Identify or develop staff training program for municipal employees	1. Permit Year 1	1. Yes/No
		2. Train staff with PPGH responsibilities, street sweeping responsibilities, and staff that work on municipal equipment	2. Annually – Permit Years 1 – 5	2. Date of training and number of staff trained
<b>Permit Ref.</b>	<b>3.7.2: Spill Response Program</b> Measures for facilities and operations that store and/or use materials that have the potential to contaminate stormwater runoff if spilled. The permittee shall maintain written spill response procedures and train staff on spill response procedures.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
28.	<b>Spill Response Procedures</b>			
	Evaluate and maintain spill response procedures as part of the PPGH Plan and train appropriate staff. Post the procedures developed in the plan on spill kits at City facilities	1. Review the written PPGH Plan, including spill response procedures, as part of the evaluation of the effectiveness of the program	1. Annually – Permit Years 1 – 5	1. Yes/No
		2. Train staff with PPGH responsibilities, street sweeping responsibilities, and staff that work on municipal equipment	2. Annually – Permit Years 1 – 5	2. Date of training and number of staff trained
<b>Permit Ref.</b>	<b>3.7.3: MS4 Operation and Maintenance Program</b> Measures to minimize pollutants in the stormwater collection system. The permittee shall provide operation and maintenance staff training on stormwater awareness and pollution prevention, perform MS4 inspections, maintain the collection system including catch basins and conveyances; and establish specific frequencies, schedules, and standard documentation.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>

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

29.	<b>MS4 O&amp;M Plan</b>			
	Maintain a written O&M Plan that includes routine inspections and maintenance of the collection system and establishes frequencies, schedules, documentation, and training for municipal staff.	1. Review the written MS4 O&M Plan as part of the evaluation of the effectiveness of the program	1. Annually – Permit Years 1 – 5	1. Yes/No
		2. Perform inspections in accordance with schedules in the MS4 O&M Plan	1. Annually – Permit Years 1 – 5	1. Yes/No
		3. Train staff with PPGH responsibilities, street sweeping responsibilities, and staff that work on municipal equipment	2. Annually – Permit Years 1 – 5	2. Date of training and number of staff trained
<b>Permit Ref.</b>	<b>3.7.4: Municipal SCM Operation and Maintenance Program</b> Measures to manage municipally-owned, operated, and/or maintained structural 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.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
30.	<b>Municipal SCM O&amp;M Plan</b>			
	Maintain a municipal SCM O&M Plan as part of the PPGH Plan and train appropriate staff	1. Review the written Municipal SCM O&M Plan as part of the evaluation of the effectiveness of the program	1. Annually – Permit Years 1 – 5	1. Yes/No
		2. Perform inspections in accordance with schedules in the Municipal SCM O&M Plan	2. Annually, once there are Municipal SCMs to inspect	2. Yes/No/NA
<b>Permit Ref.</b>	<b>3.7.5: Pesticide, Herbicide and Fertilizer Management Program</b> Measures to minimize water quality impacts from the use of landscape chemicals. The permittee shall provide routine pollution prevention and chemical use, storage and handling training, and shall ensure compliance with permits and applicator certifications.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
31.	<b>Staff Training</b>			
	Develop or identify a staff training program for pesticide/fertilizer training. This could be part of PPGH plan training (see BMP 27). Require staff and contractors that apply	1. Require staff or contractors to maintain NC Department of Agriculture Pesticide Applicator certification.	1. Continuously	1. Number of staff certified

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

	chemicals on municipal property to maintain applicator licenses	2. Identify or develop staff training for PPGH regarding pesticides, herbicides, and fertilizer	2. Permit Year 1	2. Yes/No
		3. Train staff on PPGH regarding pesticides, herbicides, and fertilizer	3. Annually – Permit Years 1-5	3. Date of training and number of staff trained
<b>Permit Ref.</b>	<b>3.7.6: Vehicle and Equipment Maintenance Program</b> Measures to prevent and minimize contamination of stormwater runoff from areas used for municipal vehicle and equipment maintenance and/or cleaning. The permittee shall ensure that municipal industrial facilities subject to NPDES industrial permitting comply with those permit requirements, provide routine pollution prevention training to staff, perform routine inspections, and establish specific frequencies, schedules, and documentation.			
<b>BMP No.</b>	<b>A</b> <b>Description of BMP</b>	<b>B</b> <b>Measurable Goal(s)</b>	<b>C</b> <b>Schedule for Implementation</b>	<b>D</b> <b>Annual Reporting Metric</b>
	<b>NPDES Industrial Permit Compliance</b>			
32.	Review municipal facilities inventory for sites that perform vehicle and equipment maintenance to determine if NPDES industrial permits are required	1. Determine if any municipal facilities require an industrial NPDES permit	1. Annually – Permit Years 1 – 5	1. Yes/No
	<b>Vehicle and Equipment Maintenance and Cleaning Plan</b>			
33.	Maintain a Vehicle and Equipment Maintenance and Cleaning Plan as part of the PPGH Plan and train appropriate staff	1. Maintain the written PPGH Plan, including vehicle and equipment maintenance procedures, as part of the evaluation of the effectiveness of the program	1. Annually – Permit Years 1-5	1. Yes/No
		2. Train staff with PPGH responsibilities, street sweeping responsibilities, and staff that work on or clean municipal equipment	2. Annually – Permit Years 1-5	2. Date of training and number of staff trained
<b>Permit Ref.</b>	<b>3.7.7: Pavement Management Program</b> Measures to reduce pollutants in stormwater runoff from municipally-owned streets, roads, and parking lots within the permittee’s corporate limits. The permittee shall implement measures to control litter, leaves, debris, particulate and fluid pollutants associated with vehicles, and establish specific frequencies, schedules, and documentation.			
<b>BMP No.</b>	<b>A</b> <b>Description of BMP</b>	<b>B</b> <b>Measurable Goal(s)</b>	<b>C</b> <b>Schedule for Implementation</b>	<b>D</b> <b>Annual Reporting Metric</b>

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

Pavement Management Plan				
34.	Maintain a Municipal Pavement Management Plan as part of the PPGH Plan and train appropriate staff. Include measures to reduce pollutants and leaf litter from City owned and maintained streets from entering the MS4 network	1. Review the written PPGH Plan, including pavement management procedures, as part of the evaluation of the effectiveness of the program	1. Annually – Permit Years 1-5	1. Yes/No
		2. Assess whether street sweeping or alternative pavement management program is warranted	2. Annually	2. Result of assessment
		3. Assess whether leaf collection is warranted	3. Permit Year 1	3. Result of assessment
		4. Provide public education about stopping vehicle leaks on stormwater webpages or in conjunction with PTRC activities	4. Permit Year 1	4. Yes/No