Draft Stormwater Management Plan Town of Jamestown NCS000400

April 2, 2024



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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 Jamestown 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 Jamestown 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 NCS000400, 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 Jamestown and located within the corporate limits of the Town of Jamestown.

In preparing this SWMP, the Town of Jamestown 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

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

Signature:

Print
Name:

Matthew Johnson

Title:

Town manager

Signed this 25th day of April 20 24.

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Percent of MS4 Area Mapped	100	%
No. of Major Outfalls* Mapped	25	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 Jamestown MS4 is located within the Cape Fear 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:

- o Waterbody Classification Map
- o Impaired Waters and TMDL Map
- o Most recent NCDEQ Final 303(d) List

Table 2: Summary of MS4 Receiving Waters

Receiving Water Name	Stream Index / AU Number	Water Quality Classification	303(d) Listed Parameter(s) of Interest
Deep River	17-(3.3)	WS-IV	N/A
Deep River	17-(3.7)	WS-IV; CA	N/A
Deep River	17-(4)	WS-IV; CA	N/A
Bull Run Creek	17-5-(1)	WS-IV	N/A
Bull Run Creek	17-5-(2)	WS-IV; CA	N/A

3.4 MS4 Interconnection

The Town of Jamestown MS4 is not interconnected with another regulated MS4, other than the statewide NCDOT MS4 and the Town 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 unknown. Quantity: N/A
- b. The interconnection is not discharging stormwater into the NCDOT MS4. The number of interconnections is known/estimated/unknown. Quantity: N/A
- c. The Town of Jamestown MS4 mapping does not identify interconnections with the NCDOT MS4.
- d. The Town of Jamestown 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)
Deep River	Fecal coliform	Yes	No

3.6 Endangered and Threatened Species and Critical Habitat

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

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

Scientific Name	Common name	Species Group	Federal Listing Status
Glyptemys muhlenbergii	Bog Turtle	Vertebrate	SAT
Notropis mekistocholas	Cape Fear Shiner	Vertebrate	Endangered
Percina rex	Roanoke Logperch	Vertebrate	Endangered
Fusconaia masoni	Atlantic Pigtoe	Invertebrate	Threatened
Haliaeetus leucocephalus	Bald Eagle	Vertebrate	BGPA

3.7 Industrial Facility Discharges

The Town of Jamestown 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		
NCG050081	Teknor Apex-North Carolina	
NCG050258	Highland Container Incorporated	
NCG170087	North Point Family Limited Partnership	

3.8 Non-Stormwater Discharges

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

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 not been evaluated by the Town of Jamestown to determine whether they may significantly impact water quality. The Town 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 surface waters.

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 Jamestown 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 Jamestown, in collaboration with Stormwater SMART and the Piedmont Triad Water Quality Partnership, has evaluated schools, homeowners and businesses as target audiences that are likely to have significant stormwater impacts.

Table 7: Summary of Target Pollutants and Sources

Target Pollutant(s)	Likely Source(s)/Target Audience(s)	SWMP Program Addressing Target Pollutant(s)/Audience(s)
Litter	Residential, Commercial, Schools,	Public Education & Outreach,
	Municipal Operations	Public Involvement &
		Participation, Pollution
		Prevention & Good
		Housekeeping
Sediment	Construction Erosion, Stream Bank Erosion	Construction Site Runoff Control
Illicit Discharges	Residential, Commercial, Schools,	Public Education & Outreach,
	Municipal Operations	Public Involvement &
		Participation, Pollution
		Prevention & Good
		Housekeeping
Fecal Coliform/Pet Waste	Residential, Schools, Failing Septic	Public Education & Outreach,
	Systems, Parks, Greenways	Public Involvement &
		Participation, Pollution
		Prevention & Good
		Housekeeping

PART 4: STORMWATER MANAGEMENT PROGRAM ADMINISTRATION

4.1 Organizational Structure

The Town of Jamestown Stormwater Program is implemented through the Public Services Department overseen by the Public Services Director. This Director is responsible for the day-to-day implementation of the program, in addition to the Assistant Director of Public Services.

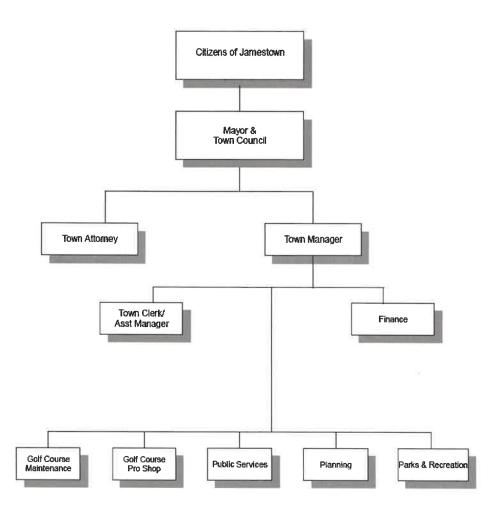


Table 8: Summary of Responsible Parties

SWMP Component	Responsible Position	Staff Name	Department
Stormwater Program Administration	Public Services Director	Paul Blanchard	Public Services
SWMP Management	Public Services Director	Paul Blanchard	Public Services
Public Education & Outreach	Public Services Director	Paul Blanchard	Public Services
Public Involvement & Participation	Public Services Director	Paul Blanchard	Public Services
Illicit Discharge Detection & Elimination	Public Services Director	Paul Blanchard	Public Services
Construction Site Runoff Control	Soil Erosion Chief	Earl Davis	Soil Erosion Control Section
Post-Construction Stormwater Management	Public Services Director	Paul Blanchard	Public Services
Pollution Prevention/Good Housekeeping for Municipal Operations	Public Services Director	Paul Blanchard	Public Services
Municipal Facilities Operation & Maintenance Program	Public Services Director	Paul Blanchard	Public Services
Spill Response Program	Public Services Director	Paul Blanchard	Public Services
MS4 Operation & Maintenance Program	Public Services Director	Paul Blanchard	Public Services
Municipal SCM Operation & Maintenance Program	Public Services Director	Paul Blanchard	Public Services
Pesticide, Herbicide & Fertilizer Management Program	Public Services Director	Paul Blanchard	Public Services
Vehicle & Equipment Cleaning Program	Public Services Director	Paul Blanchard	Public Services
Pavement Management Program	Public Services Director	Paul Blanchard	Public Services
Total Maximum Daily Load (TMDL) Requirements	Public Services Director	Paul Blanchard	Public Services

4.2 Program Funding and Budget

In accordance with the issued permit, the Town of Jamestown shall maintain adequate funding and staffing to implement and manage the provisions of the SWMP and comply with the requirements of the NPDES MS4 Permit. The budget includes the permit administering and compliance fee, which is billed by the Division annually.

The Town of Jamestown funds the Stormwater Program through its general fund and starting January 2024 will be funded, in part, through a new Stormwater Utility Fee. The new Utility Fee was determined a necessity to ensure adequate funding of the Stormwater Program. For the FY 23-24, the Stormwater Budget is \$58,400 and \$50,000 will come from the Utility Fee and \$8,400 will come from the general fund.

4.3 Shared Responsibility

The Town of Jamestown 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 Jamestown 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 Jamestown 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 3.2	Piedmont Triad Regional Council (PTRC) – Stormwater SMART	Y
Permit 3.5	Guilford County Soil Erosion Control Section	Y
Permit 3.6.6 (b)	Guilford County Environmental Health	Y

4.4 Co-Permittees

The are no other entities applying for co-permittee status under the NPDES MS4 permit number NCS000400 for the Town of Jamestown. Table 10 summarizes contact information for each copermittee.

Table 10: Co-Permittee Contact Information

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

4.5 Measurable Goals for Program Administration

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

Permit Ref.	1.4.1, 2.1.1, 2.1.2, and 2.2.2 Shared Responsibility and Program Implementation 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.					
ВМР	A	В	c	D		
No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric		
#1.	Annual Self-Assessment	1				
	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		
#2.	Shared Responsibility		N. C.			
	Agreements with entities operating on behalf of the town/city of [MS4 name] will be reviewed to confirm that the entity has agreed to implement part of the program on the municipalities behalf and that all required documentation will be submitted to the municipality for documentation and reporting purposes.	1. Review all agreements and confirm that they meet all requirements outlined in 1.4.1 of the MS4 permit.	1. Permit Year 1	1. Yes/No		
<i>‡</i> 3.	Minimum Control Measures					
	Written programs will be created to assure compliance with part 2.2.2 of the MS4 Permit. Written programs shall be reviewed on an annual basis	Develop and maintain written programs for all minimum control measures.	1. Permit Year 1	1. Yes/No		
	and modified if needed to best outline the program and needs of the municipality.	2. Review written programs and modify/update.	2. Annually	2. Yes/No		
#4.	Funding and Staffing					
	The funding and staffing status of the program will be evaluated by appropriate City/Town staff to confirm that the program is meeting permit requirements.	1. Review and analyze the current funding and staffing of the program.	1. Annually	1. Adequate/inadequate		

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.				
ВМР	A	В	C	D	
No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric	
#5.	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 reissuance.	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 renewa application submittal	

PART 5: PUBLIC EDUCATION AND OUTREACH PROGRAM

The Town of Jamestown 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 Jamestown 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, Municipal Operations
Sediment	Construction Erosion, Stream Bank Erosion
Illicit Discharges	Residential, Commercial, Schools, Municipal Operations
Fecal Coliform/Pet Waste	Residential, Schools, Failing Septic Systems, Parks, Greenways
Illegal Dumping	Residential, Commercial, Schools, Municipal Operations
Improper Disposal of Waste	Residential, Commercial, Schools, Municipal Operations

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

Permit Ref.	3.2.2 and 3.2.4: Outreach to Targeted Audiences Measures to identify the specific elements and implementation of a Public Education and Outreach Program to share educational materials to the community or conduct equivalent outreach activities about the impacts of stormwater discharges on water bodies and how the public can reduce pollutants in stormwater runoff. The permittee shall provide educational information to identified target audiences on pollutants/sources identified in table 12 above, and shall document the extent of exposure of each media, event or activity, including those elements implemented locally or through a cooperative agreement.					
DMD	A	В	C	D		
BMP No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric		
#6.	Public Outreach					
		1. If needed, maintain	1. Annually for permit	1. Yes/No/NA		

	target pollutants will be sent via	2. Distribute an annual	2. Annually for permit	2. Report number of
	direct mail, email, newsletter and given out at community events. An annual outreach campaign will be conducted via various media methods including social media, online advertising, and radio. In-person K-12 educational programs will be offered at schools, libraries, and summer camp.	newsletter via sign-up, social media and at Town Hall, describing target pollutants and their impacts on water quality. Post monthly on social media channels to promote the stormwater program's message. Complete at least 4 weeks of online ad placement for target pollutant videos. Provide at least 4 weeks of radio, TV, or cable PSAs for stormwater education. At least twice a year, offer in-person environmental education	2. Annually for permit years 1-5	2. Report number of newsletters distributed; Number of social media posts; Number of advertising campaigns; Number of educational programs; Number of people that participated in educational programs
17.	Town-Sponsored Events	programs to K-12 educators.		
	Distribute educational information on stormwater pollution and the stormwater program during at least one Town-sponsored event or festival each year. Example events include	1. Develop or identify existing educational displays and information that promote stormwater pollution education	1. Annually for permit years 1-5	1. Yes/No/Partial
	Music in the Park, National Night Out, or the Christmas Parade.	2. Staff a booth at the chosen event and distribute educational materials	2. Annually for permit years 1-5	2. Report the event and number of participants that came to the booth
Permit Ref.	2.1.7, 3.2.3 and 3.6.5(c): Web Site Measures to provide a web site desi including ordinances, or other regul mechanisms, providing the legal aut and SWMP. The web page shall als design standards, checklists and/or of the standards.	gned to convey the progra atory mechanisms, or a li- thority necessary to imple so provide developers with	st identifying the ordinan ment and enforce the req	ices or other regulatory juirements of the permit
ВМР	A	В	C	D
No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
#8.	Town Stormwater Website			1
	Continue to maintain the stormwater web pages with information about stormwater education, ordinances, program requirements, utility fee, and other relevant information	1. Review website for broken links, new information, and updated material	1. Annually for permit years 1-5	1. Yes/No

Permit Ref.	3.2.5: Stormwater Hotline Measures for a stormwater hotline/helpline for the purpose of public education and outreach.				
ВМР	A	В	C	D	
No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric	
#9.	Stormwater Hotline				
	Continue to maintain and advertise the stormwater hotline that allows resident to ask stormwater questions	1. Add hotline number to any new stormwater education webpages	1. Annually for permit years 1-5	1. Yes/No/NA	
	and report stormwater issues.	2. Train staff answering the hotline in general stormwater information, and appropriate contacts	2. Annually for permit years 1-5	2. Yes/No	
		for stormwater questions 3. Test hotline	3. Quarterly for permit	3. Yes/No	
		functionality quarterly	years 1-5	J. 145.1.5	

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 Jamestown will manage, implement and report the following 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.				
ВМР	A	В	C	D	
No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric	
#10.	Town Stormwater Website				
	Continue to maintain the stormwater web pages with information about stormwater education, ordinances, program requirements, utility fee, and other relevant information	Review website annually for broken links, new information, and updated material	1. Annually for permit years 1-5	1. Yes/No	
#11.	Stormwater Hotline				
	Continue to maintain and advertise the stormwater hotline that allows resident to ask stormwater questions	1. Add hotline number to any new stormwater education webpages	1. Annually for permit years 1-5	1. Yes/No	
	and report stormwater issues.	2. Train staff answering the hotline in general stormwater information, and appropriate contacts for stormwater questions	2. Annually for permit years 1-5	2. Yes/No	
Permit Ref.	3.3.2: Volunteer Opportunities Measures to provide volunteer opportunities		note ongoing citizen part	icipation.	
ВМР	A	В	C	D	
No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric	
#12.	Volunteer Opportunities				
	Provide public involvement and participation activities locally or through partnership with Stormwater SMART at PTRC. Opportunities can	Maintain legal agreement with PTRC for public involvement and participation	1. Annually for permit years 1-5	1. Yes/No/NA	

Table 14: Public Involvement and Particip	pation BMPs		
include Guilford Creek Week Events, Cooperative Extension Programs, local Community College initiatives, or can be partnerships with local community and business groups such as Scouts, the Business Association, or the YMCA	2. Participate in at least 1 Guilford Creek Event involving public participation. Contact local community groups about implementing projects that improve water quality and promote citizen science efforts. Host a public meeting for citizens to attend to ask stormwater questions and provide feedback on the stormwater program. Coordinate a litter clean- up event.	2. Annually for permit years 1-5	2. Report number of participants in Town Creek Week Events; number of volunteer water quality projects implemented; number of citizen science water quality project participants; number of citizens in attendance for public stormwater meetings; number of volunteers for litter clean-up event

PART 7: ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM

The Town of Jamestown 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.

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.				
ВМР	Printing of the American State	В	C	D	
No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric	
#13.	MS4 Map				
	Maintain the MS4 map with stormwater conveyances, flow	1. Review map to ensure completeness	1. Permit year 1	1. Yes/No/Partial	
	direction, major outfalls, and waters of the United States receiving stormwater discharges	2. Develop process for collecting new as-built data and incorporating into the existing map	2. Permit year 1	2. Yes/No/Partial	
		3. Add newly found conveyances and outfalls to the existing map	3. Annually permit years 1-5	3. Yes/No; report quantity found	
Permit Ref.	3.4.2: Regulatory Mechanism Measures to provide an IDDE ordir prohibit, detect, and eliminate illicit including enforcement procedures a	t connections and discharg	mechanism that provides l ges, illegal dumping and s	egal authority to pills into the MS4,	
ВМР	A	В	C	D	
No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric	
#14.	Maintain Legal Authority				
	The Town's stormwater ordinance provides legal authority to prohibit,	1. Maintain and enforce IDDE ordinance	1. Continually	1. Yes/No	
	detect, and eliminate illicit discharges	2. Review ordinance to	2. Once per permit term	2. Yes/No	

Permit Ref.	3.4.3: IDDE Plan Measures to maintain and implement dumping and any non-stormwater d The plan shall provide standard pro-	ischarges identified as sig	nificant contributors of po	lischarges, illegal ollutants to the MS4.			
	a) Locate priority areas likely to have illicit discharges,b) Conduct routine dry weather outfall inspections,						
	c) Identify illicit of	discharges and trace sourc	es,				
	d) Eliminate the s						
	e) Evaluate and as	ssess the IDDE Program.					
ВМР	A	В	C	D			
No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric			
#15.	Written IDDE Plan						
	Develop a written IDDE Plan separate from the 2016 SWMP. The	1. Develop a written IDDE Plan	1. Permit year 1	1. Yes/No/Partial			
	Plan will include standard procedures and documentation as listed in permit 3.4.3	Review the IDDE Plan and revise as needed	2. Permit years 2-5	2. Yes/No			
#16.	Outfall Dry Weather Screening						
	Continue to perform dry weather screening at outfalls to proactively identify illicit discharges and connections. Inspections should be completed after no rain for at least 72 hours.	Train inspection staff or contractors on dry weather screening procedures and reporting	1. Annually permit years 1-5	1. Yes/No/Partial			
		2. Perform inspections of 100% of mapped outfalls	2. Annually permit years 1-5	2. Percent inspected			
		3. Trace and eliminate any illicit discharges or connections that are found during dry weather screening	3. Continually	3. Quantity found			
#17.	IDDE Program Evaluation						
3CM 74	Evaluate the IDDE program annually to check for effectiveness, find areas of improvement, locate priority areas likely to have illicit discharges, and to identify chronic violators.	1. Review IDDE tracking document to identify chronic violators, and/or "hot spot" areas for illicit discharges	1. Annually permit years 2-5, during self- assessment for permit	1. Yes/No/NA			

Permit Ref.	3.4.4: IDDE Tracking Measures for tracking and documenting the date(s) an illicit discharge, illicit connection or illegal dumping was observed, the results of the investigation, any follow-up of the investigation, the date the investigation was closed, the issuance of enforcement actions, and the ability to identify chronic violators.				
ВМР	A	В	C	D	
No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric	
#18.	IDDE Tracking				
	Develop and implement an IDDE tracking mechanism that will include	1. Develop an IDDE tracking document	1. Permit year 1	1. Yes/No	
	dates observed, results of investigations, enforcement actions,	2. Maintain IDDE tracking document	2. Annually permit years 2-5	2. Yes/No	
	and the ability to identify chronic violators.	3. Track and report results from IDDE investigations	3. Annually permit years 2-5	3. Number of illicit discharge/connection/du mping investigations; Number of illicit discharges; Number of illicit connections; Number of enforcement	
	3.4.5: Staff IDDE Training			actions	
Ref.	Measures to provide training for mesponsibilities, may observe an illinclude how to identify and report it training event shall be documented	cit discharge, illicit conne llicit discharges, illicit co , including the agenda/ma	ection, illegal dumping or s nnections, illegal dumping terials, date, and number of	actions ormal job spills. Training shall g and spills. Each staff of staff participating.	
Permit Ref. BMP	Measures to provide training for mesponsibilities, may observe an illinclude how to identify and report it training event shall be documented. A	cit discharge, illicit conne llicit discharges, illicit co , including the agenda/ma B	ection, illegal dumping or someotions, illegal dumping terials, date, and number of C	actions ormal job spills. Training shall and spills. Each staff of staff participating. D	
BMP No.	Measures to provide training for more responsibilities, may observe an illiniculde how to identify and report it training event shall be documented. A Description of BMP	cit discharge, illicit conne llicit discharges, illicit co , including the agenda/ma	ection, illegal dumping or s nnections, illegal dumping terials, date, and number of	actions ormal job spills. Training shall g and spills. Each staff of staff participating.	
Ref. BMP No.	Measures to provide training for more responsibilities, may observe an illiniculde how to identify and report it training event shall be documented. A Description of BMP Staff Training	cit discharge, illicit conne llicit discharges, illicit con , including the agenda/ma B Measurable Goal(s)	ection, illegal dumping or someotions, illegal dumping terials, date, and number of C Schedule for	actions ormal job spills. Training shall g and spills. Each staff of staff participating. D Annual Reporting	
Ref. BMP	Measures to provide training for more responsibilities, may observe an illiniculde how to identify and report it training event shall be documented. A Description of BMP	cit discharge, illicit conne llicit discharges, illicit co , including the agenda/ma B	ection, illegal dumping or someotions, illegal dumping terials, date, and number of C Schedule for	actions ormal job spills. Training shall and spills. Each staff of staff participating. D Annual Reporting	

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.				
ВМР	A	В	С	D	
No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric	
#20.	Town Stormwater Website				
	Continue to maintain the stormwater web pages with information about stormwater education, ordinances, program requirements, utility fee, and other relevant information.	Review website annually for broken links, new information, and updated material	1. Annually for permit years 1-5	1. Yes/No/Partial	
		2. Post link to DEQ Laserfiche for easy public access to annual reports	2. Permit year 1	2. Yes/No	
#21.	Stormwater Hotline				
	Continue to maintain and advertise the stormwater hotline that allows resident to ask stormwater questions	1. Add hotline number to any new stormwater education webpages	1. Annually for permit years 1-5	1. Yes/No/NA	
	and report stormwater issues.	2. Train staff answering the hotline in general stormwater information, and appropriate contacts for stormwater questions	2. Annually for permit years 1-5	2. Yes/No	

PART 8: CONSTRUCTION SITE RUNOFF CONTROL PROGRAM

In accordance with 15A NCAC 02H .0153, the Town of Jamestown 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 -	Guilford County Soil Erosion	15A NCAC Chapter 04,	Guilford County
3.5.4	Control Section	NCDEQ Approved Delegation,	
	Delegated SPCA Program*	Interlocal Agreement/Joint	
	_	Resolution, Local Ordinance	

^{*} The local delegated SPCA Program ordinance(s)/regulatory mechanism(s) can be found at: https://www.guilfordcountync.gov/our-county/planning-development/soil-erosion-control https://library.municode.com/nc/jamestown/codes/land_development_ordinance?nodeId=LADEORTOJANOCA_ART20SOERSECO

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

Permit Ref.	3.5.6: Public Input Measures to provide and promote a erosion and sedimentation problems		otify the appropriate author	rities of observed	
BMP	A	В	C	D	
No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric	
#22.	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 Permit Years 1-5	Yes/No/Partial; report number of staff trained	
#23.	Stormwater Hotline				
	Continue to maintain and advertise the stormwater hotline that allows	Add hotline number to any new stormwater education webpages	1. Annually for permit years 1-5	1. Yes/No/NA	

	resident to ask stormwater questions and report stormwater issues.	2. Train staff answering the hotline in general stormwater information, and appropriate contacts for stormwater questions	2. Annually for permit years 1-5	2. Yes/No
Permit Ref.	3.5.5: Waste Management Measures to require construction si truck washout, chemicals, litter, and water quality.	te operators to control was d sanitary waste at the con	ste such as discarded bui	ilding materials, concret ause adverse impact to
DAKE	A	В	C	D
BMP No.	A Description of BMP	B Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
			Schedule for	Annual Reporting
No.	Description of BMP		Schedule for	Annual Reporting

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 Jamestown 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 Jamestown 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-IV)	15A NCAC 2B	Land Development Ordinance
	.06200624	Article 19
Randleman Lake Water Supply	15A NCAC 2B .0251	Land Development Ordinance
Watershed Nutrient Management Strategy		Article 19

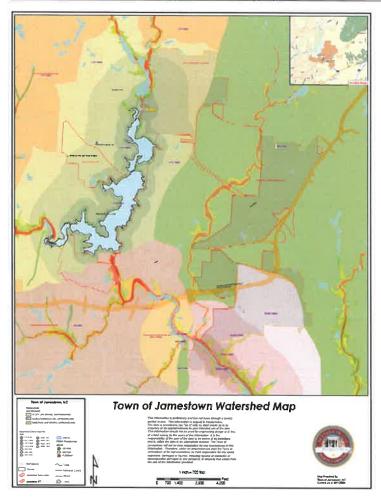


Table 19: Summary of Existing Post-Construction Program Elements

Permit Requirements for	Municipal Ordinance/Code Reference(s)	Date Adopted
Plan Review and Approval	and/or Document Title(s)	
3.6.2(a) Authority	19.2	5/18/2021 (updated for 160D)
3.6.3(a) & 15A NCAC 02H.0153(c) Federal, State & Local Projects	19.19	7/21/2009
3.6.3(b) Plan Review	7.1, 7.7, 20.12	5/18/2021 (updated for 160D)
3.6.3(c) O&M Agreement	19.25	7/21/2009
3.6.3(d) O&M Plan	19.25-1	7/21/2009
3.6.3(e) Deed Restrictions/Covenants	1.8, 18.2-6, 19.12, 19.19.1	7/21/2009
3.6.3(f) Access Easements	7.13-3, 19.25.6	7/21/2009
Permit Requirements for Inspections and Enforcement	Municipal Ordinance/Code Reference(s) and/or Document Title(s)	Date Adopted
3.6.2(b) Documentation	19.16.1	5/18/2021
3.6.2(c) Right of Entry	19.25	7/21/2009
3.6.4(a) Pre-CO Inspections	7.1.1, 19.1.9, 19.6,6, 19.26.1	5/18/21 and 7/21/2009
3.6.4(b) Compliance with Plans	19.16.6	5/18/21
3.6.4(c) Annual SCM Inspections	19.24B	7/21/2009
3.6.4(d) Low Density Inspections	19.24B	7/21/2009
3.6.4(e) Qualified Professional	19.24B	7/21/2009
Permit Requirements for Fecal Coliform Reduction	Municipal Ordinance/Code Reference(s) and/or Document Title(s)	Date Adopted
3.6.6(a) Pet Waste	19-29.1	7/21/2009 (reworded 9/19/23)
3.6.6(b) On-Site Domestic Wastewater Treatment	19.29.2	7/21/2009

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

I	A Description of BMP	В	C	D	
No. \$\frac{\psi_25.}{\text{II}}				D.	
I		Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric	
	Standard Reporting				
ro a	Implement standardized tracking, documentation, inspections and reporting mechanisms to compile appropriate data for the annual self-	1. Track number of low density and high density plan reviews performed.	1. Continuously Permit Years 1-5	Number of plan reviews performed for low density and high density.	
p	assessment process. Data shall be provided for each Post-Construction/Qualifying Alternative Program	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.	
1	peing implemented as listed in Tables 18 and 19. Low density shall be defined by Town ordinance.	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 annual SCM inspections performed.	4. Continuously Permit Years 1-5	4. Number of SCM inspections.	
		5. Track number of low density inspections performed once per permit term.	5. Once per permit term	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.	
Ref. N	2.3 and 3.6: Qualifying Alternative Measures to develop, implement and equirements.		s in order to comply with	the QAP state program	
вмР	A	В	C	D	
No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric	

PART 10: POLLUTION PREVENTION AND GOOD HOUSEKEEPING PROGRAMS

This SWMP provides a comprehensive pollution prevention and good housekeeping strategy for the Town of Jamestown 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 Jamestown will manage, implement and report the pollution prevention and good housekeeping BMPs as specified in Table 21 below for each required program.

Permit Ref.	3.7.1: Municipal Facilities Operation Measures to manage facilities that are of stormwater runoff. The permittee shall and routine maintenance; establish specigeneral stormwater awareness and imp	when and operated by the parameter inventor maintain a current inventor cific frequencies, schedules,	permittee and have the poten by of municipal facilities; per and standard documentation	rform facility inspections n; provide staff training on	
DMAD	A	В	C	D	
BMP No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric	
#26.	Pollution Prevention and Good Housekeeping (PPGH) Plan				
	Develop a written PPGH Plan that includes routine inspections and	Develop a written PPGH Plan	1. Permit year 1	1. Yes/No/Partial	
	maintenance at municipal facilities and establishes frequencies, schedules, documentation, and training for municipal staff. The Plan	2. Maintain municipal facility inventory including stormwater pollution potential	2. Continuously after permit year 1	2. Number of municipal facilities with stormwater pollution potential	
	will include standard procedures and documentation as listed in permit 3.7.1	3. Perform municipal facility inspections in accordance with the PPGH Plan schedule	3. Annually for permit years 2-5	3. Number of facilities inspected	

1 abic 2	21: Pollution Prevention and Good			
		4. Determine if facilities require an industrial permit or no-exposure certification	4. Permit year 1	4. Yes/No/Partial
		5. Evaluate the PPGH Plan and revise as needed	5. Permit years 2-5 during self-assessment for permit	5. Yes/No; report if revisions were required
#27.	Staff Training			<u></u>
	Develop or identify staff training options for stormwater pollution	Develop or identify training options	1. Permit year 1	1. Yes/No/Partial
	prevention, spill response, fertilizer training, and pavement management. Include training on the general PPGH plan.	2. Train municipal staff with PPGH responsibilities	2. Annually permit years 2-5	2. Yes/No/Partial; report number of staff trained
Permit	3.7.2: Spill Response Program			HELLE THE STATE
Ref.	Measures for facilities and operations to runoff if spilled. The permittee shall me procedures.	hat store and/or use materia aintain written spill respons	Is that have the potential to cee procedures and train staff	ontaminate stormwater on spill response
BMP	A	В	C	D
No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
#28.	Spill Response Procedures		•	
	Develop written spill response procedures for each municipal facility	Develop a written Spill Response Plan	1. Permit year 1	1. Yes/No/Partial
	and provide routine spill response training.	2. Train municipal staff on spill response procedures.	2. Annually permit years 2-5	2. Yes/No/Partial; report number of staff trained
Permit Ref.	3.7.3: MS4 Operation and Maintena Measures to minimize pollutants in the maintenance staff training on stormwat collection system including catch basin documentation.	stormwater collection syste er awareness and pollution s and conveyances; and esta	prevention, perform MS4 ins	pections, maintain the
ВМР	A	В	C	D
No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
#29.	MS4 Operation and Maintenance (O	&M) Plan		
	Develop a written O&M Plan that includes routine inspections and	Develop a written O&M Plan	1. Permit year 1	1. Yes/No/Partial
	maintenance of the collection system and establishes frequencies,	2. Train municipal staff on O&M requirements	2. Annually permit years 2-5	2. Yes/No/Partial; repor number of staff trained

Permit Ref.	3.7.4: Municipal SCM Operation an Measures to manage municipally-owner are installed for compliance with the perinventory of SCMs, perform SCM inspection.	ed, operated, and/or maintain ermittee's post-construction	program. The permittee sha	Il maintain a current
BMP No.	A	B B	C Schedule for	D Annual Reporting
الباحوا	Description of BMP	Measurable Goal(s)	Implementation	Metric
#30.	Municipal SCM Operation and Main			
	Develop a written SCM O&M Plan that includes routine inspections and	Develop a written SCM O&M Plan	1. Permit year 1	1. Yes/No/Partial
	maintenance of municipally owned SCMs and establishes frequencies,	2. Maintain an inventory of municipal SCMs	2. Continually	2. Number of SCMs
	schedules, and documentation. The Plan will include standard procedures and documentation as listed in permit 3.7.4	3. Perform municipal SCM inspections and maintenance	3. Annually permit years 1-5	3. Number of inspections
Permit	3.7.5: Pesticide, Herbicide and Fertil	lizer Management Progran	1	
	3.7.5: Pesticide, Herbicide and Fertil Measures to minimize water quality im pollution prevention and chemical use, applicator certifications.	pacts from the use of landsc storage and handling trainin	ape chemicals. The permitte g, and shall ensure compliar	nce with permits and
Permit Ref. BMP	Measures to minimize water quality im pollution prevention and chemical use,	pacts from the use of landsc	ape chemicals. The permitteg, and shall ensure compliar	D D
Ref. BMP	Measures to minimize water quality im pollution prevention and chemical use, applicator certifications.	pacts from the use of landsc storage and handling trainin	ape chemicals. The permitte g, and shall ensure compliar	nce with permits and
Ref. BMP No.	Measures to minimize water quality im pollution prevention and chemical use, applicator certifications.	pacts from the use of landsc storage and handling trainin B Measurable Goal(s)	ape chemicals. The permitte g, and shall ensure compliar C Schedule for	D Annual Reporting
Ref.	Measures to minimize water quality im pollution prevention and chemical use, applicator certifications. A Description of BMP Applicator Training and Certification Develop or identify training for Town staff and contractors that apply	pacts from the use of landsc storage and handling trainin B Measurable Goal(s) n 1. Identify staff and contractors that apply	ape chemicals. The permitte g, and shall ensure compliar C Schedule for	D Annual Reporting
BMP	Measures to minimize water quality im pollution prevention and chemical use, applicator certifications. A Description of BMP Applicator Training and Certification Develop or identify training for Town	pacts from the use of landsc storage and handling trainin B Measurable Goal(s) n	ape chemicals. The permitte g, and shall ensure compliar C Schedule for Implementation	D Annual Reporting Metric 1. Yes/No/Partial 2. Yes/No/Partial
BMP No.	Measures to minimize water quality im pollution prevention and chemical use, applicator certifications. A Description of BMP Applicator Training and Certification Develop or identify training for Town staff and contractors that apply landscape chemicals or store them on municipal property, and require	B Measurable Goal(s) 1. Identify staff and contractors that apply landscape chemicals 2. Develop or identify appropriate training courses for landscape	ape chemicals. The permitte g, and shall ensure compliar C Schedule for Implementation 1. Permit year 1	D Annual Reporting Metric 1. Yes/No/Partial

Permit Ref.	3.7.6: Vehicle and Equipment Maint Measures to prevent and minimize con equipment maintenance and/or cleanin industrial permitting comply with those perform routine inspections, and estable	tamination of stormwater rung. The permittee shall ensure permit requirements, proving	e that municipal industrial fa de routine pollution preventi	cilities subject to NPDES
ВМР	A	В	C	D
No.	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
#32.	Vehicle and Equipment Cleaning an	d Maintenance		
	Perform routine inspections and maintenance at the Town vehicle and equipment cleaning facility as part of	Perform routine inspections per the GHPP Plan	1. Annually permit years 1-5	1. Number of inspections
	the general facility inspection per the GHPP Plan. Ensure that staff are	2. Train staff on inspections and usage	2. Annually, permit years	2. Number of staff trained
	trained on inspection and usage procedures.	procedures		V
		procedures am water runoff from municipal hittee shall implement measu	res to control litter, leaves, d	parking lots within the ebris, particulate and fluid
Ref.	procedures. 3.7.7: Pavement Management Progr Measures to reduce pollutants in storm permittee's corporate limits. The perm	procedures am water runoff from municipal hittee shall implement measu	res to control litter, leaves, d	parking lots within the ebris, particulate and fluid
Permit Ref. BMP No.	procedures. 3.7.7: Pavement Management Progr Measures to reduce pollutants in storm permittee's corporate limits. The perm pollutants associated with vehicles, and	procedures am water runoff from municipal ittee shall implement measu d establish specific frequenci	res to control litter, leaves, d es, schedules, and document C Schedule for	parking lots within the ebris, particulate and fluid ation.
Ref. BMP	procedures. 3.7.7: Pavement Management Progr Measures to reduce pollutants in storm permittee's corporate limits. The perm pollutants associated with vehicles, and	procedures am water runoff from municipal aittee shall implement measu destablish specific frequenci B Measurable Goal(s)	res to control litter, leaves, des, schedules, and document	parking lots within the ebris, particulate and fluid ation. D Annual Reporting
Ref. BMP No.	procedures. 3.7.7: Pavement Management Progr Measures to reduce pollutants in storm permittee's corporate limits. The perm pollutants associated with vehicles, and A Description of BMP	procedures am water runoff from municipal aittee shall implement measu destablish specific frequenci B Measurable Goal(s)	res to control litter, leaves, d es, schedules, and document C Schedule for	parking lots within the ebris, particulate and fluid ation. D Annual Reporting
Ref. BMP No.	procedures. 3.7.7: Pavement Management Progr Measures to reduce pollutants in storm permittee's corporate limits. The perm pollutants associated with vehicles, and A Description of BMP Pollution Prevention and Good House Develop a written PPGH Plan that	procedures am water runoff from municipal aittee shall implement measured establish specific frequencians B Measurable Goal(s) sekeeping (PPGH) Plan 1. Develop a written	res to control litter, leaves, des, schedules, and document C Schedule for Implementation	parking lots within the ebris, particulate and fluid ation. D Annual Reporting Metric