

**Final Stormwater Management Plan**  
**Town of Montreat**  
**NCS000430**

April 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 Montreat 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 Montreat 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 NCS000440, 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 Montreat and located within the corporate limits of the Town of Montreat.

In preparing this SWMP, the Town of Montreat has evaluated its MS4 and the permit requirements to develop a comprehensive 5-year SWMP that will meet the community's needs, address local water quality issues and provide the minimum measures necessary to comply with the permit. The SWMP will be evaluated and updated annually to ensure that the elements and minimum measures it contains continue to adequately provide for permit compliance and the community's needs.

Once the SWMP is approved by NCDEQ, all provisions contained and referenced in this SWMP, along with any approved modifications of the SWMP, are incorporated by reference into the permit and become enforceable parts of the permit. Any major changes to the approved SWMP will require resubmittal, review and approval by NCDEQ, and may require a new public comment period depending on the nature of the changes.


**PART 2: CERTIFICATION**

By my signature below I hereby certify, under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

I am also aware that the contents of this document shall become an enforceable part of the NPDES MS4 Permit, and that both the Division and the Environmental Protection Agency have NPDES MS4 Permit compliance and enforcement authority.

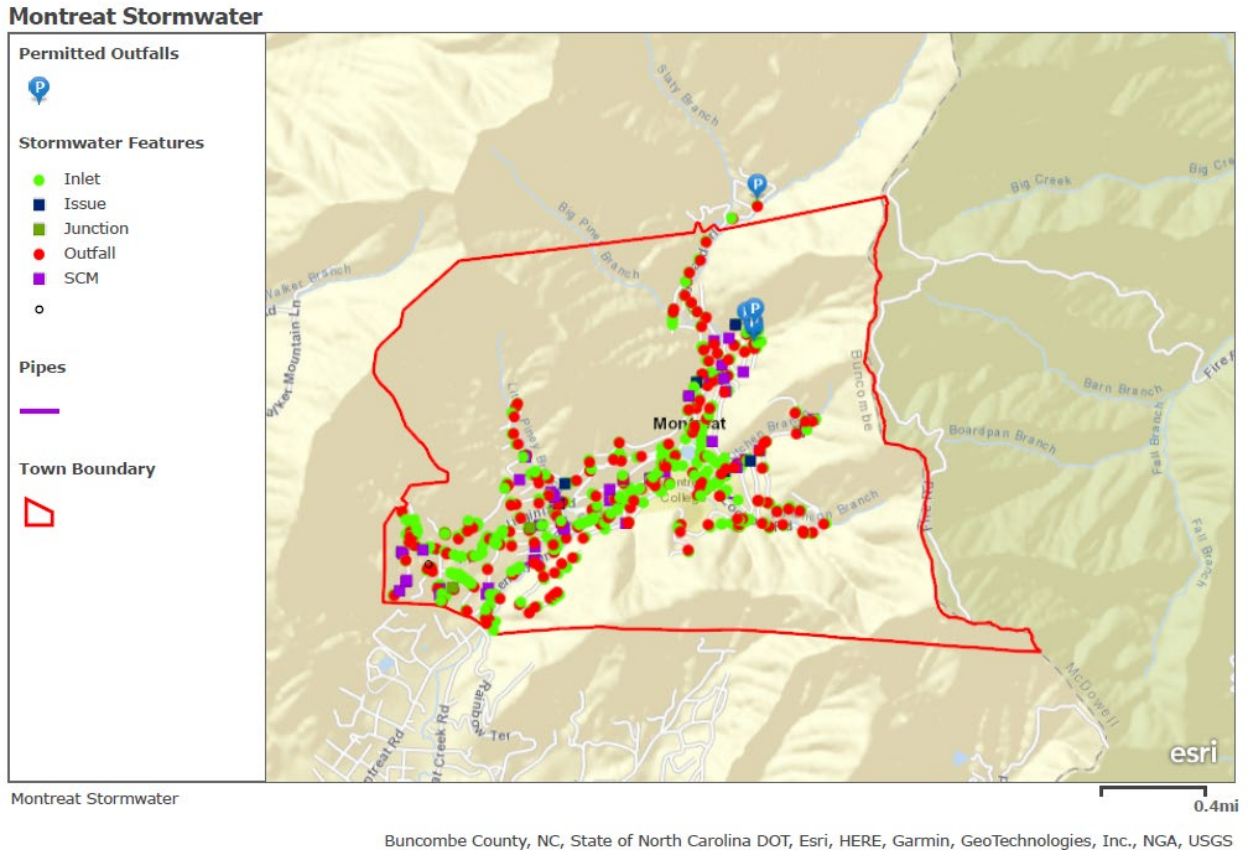
- I am a ranking elected official.
- I am a principal executive officer for the permitted MS4.
- I am a duly authorized representative for the permitted MS4 and have attached the authorization made in writing by a principal executive officer or ranking elected official which specifies me as (*check one*):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

<i>Signature:</i>	
<i>Print Name:</i>	<i>Timothy R. Helms</i>
<i>Title:</i>	<i>Mayor</i>
Signed this 4th day of April 2024.	

## PART 3: MS4 INFORMATION

### 3.1 Permitted MS4 Area

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



### 3.2 Existing MS4 Mapping

The current MS4 mapping includes mapping inlets and catch basins, pipes with flow direction, outfalls and receiving waters. Major outfalls are identified in a separate data layer. Information such as material, depth, diameter, and condition are also recorded, and a photo is linked to inlets and outfalls.

The stormwater system map is hosted by Land of Sky Regional Council and available online:

<https://arcg.is/b108K>

Table 1: Summary of Current MS4 Mapping

Percent of MS4 Area Mapped	100	%
No. of Major Outfalls* Mapped	5	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 Montreat MS4 is located within the French Broad 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
Flat Creek	6-78-6-(1), 6-78-6-(4)	C, HQW	N/A
Big Piney Branch	6-78-6-5	C, HQW	N/A
Little Piney Branch	6-78-6-7	C	N/A
Puncheon Branch	6-78-6-6	C	N/A
Kitchen Branch	6-78-6-6-1	C	N/A

### 3.4 MS4 Interconnection

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

The MS4 does not interconnect with the statewide NCDOT MS4.

### 3.5 Total Maximum Daily Loads (TMDLs)

No total maximum daily loads have been established in the MS4, as determined by the map and list provided on the [NCDEQ Modeling & Assessment Unit web page](#). There is a statewide TMDL for mercury; however, the French Broad River Basin was not an area of concern. The following link provides additional information on the NC Statewide Mercury TMDL.

[https://files.nc.gov/ncdeq/Water%20Quality/Planning/TMDL/FINAL%20TMDLS/Statewide/NCMercuryTMDL\\_EPASubmit.pdf](https://files.nc.gov/ncdeq/Water%20Quality/Planning/TMDL/FINAL%20TMDLS/Statewide/NCMercuryTMDL_EPASubmit.pdf)

### 3.6 Endangered and Threatened Species and Critical Habitat

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

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

Scientific Name	Common name	Species Group	Federal Listing Status
<i>Alasmidonta raveneliana</i>	Appalachian elktoe	Invertebrate	E
<i>Clemmys muhlenbergii</i>	bog turtle	Reptile	T
<i>Glaucomys sabrinus coloratus</i>	Carolina northern flying squirrel	Mammal	E
<i>Myotis grisescens</i>	Gray bat	Mammal	E
<i>Sarracenia rubra ssp.jonesii</i>	Mountain sweet pitcher-plant	Vascular Plant	E
<i>Myotis septentrionalis</i>	Northern Long-Eared Bat	Mammal	T

### 3.7 Industrial Facility Discharges

The Town of Montreat MS4 jurisdictional area does not have any 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
None	



### 3.8 Non-Stormwater Discharges

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

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 Montreat.

Wash water associated with car washing that does not contain detergents or does not discharge directly into the MS4 is considered incidental. However, these types of non-stormwater discharges that do contain detergents have been evaluated by the Town of Montreat to determine whether they may significantly impact water quality. According to the 2022 Integrated Report, the portions of the Flat Creek receiving discharges from the MS4 are meeting water quality criteria for parameters such as pH and dissolved oxygen, which indicates that there is not an issue with detergent runoff.

Table 6: Non-Stormwater Discharges

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

### 3.9 Target Pollutants and Sources

In addition to those target pollutants identified above, the Town of Montreat is not aware of other significant water quality issues within the permitted MS4 area. A 205j-funded stream assessment and water quality testing in 2020 found that Flat Creek and its tributaries have **good to excellent** streambank stability, streamflow, chemistry, habitat and diversity.

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 Montreat 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	Residents, Montreat College, Montreat Conference Center	Public Education & Outreach, Public Involvement & Participation
Lawn Care Activities	Residents, Montreat College, Montreat Conference Center, Public Works (Parks and ROW maintenance)	Public Education & Outreach, Public Involvement & Participation, Pollution Prevention & Good Housekeeping
Illicit Discharges	Residents, Montreat College, Montreat Conference Center	Public Education & Outreach, Public Involvement & Participation, Illicit Discharge Detection & Elimination (IDDE)
Sediment	Construction Sites	Construction Site Runoff Control, Post-Construction Site Runoff Control
Illegal Dumping	Residents, Montreat College, Montreat Conference Center	Public Education & Outreach, Pollution Prevention & Good Housekeeping
Improper Disposal of Waste	Residents, Montreat College, Montreat Conference Center	Public Education & Outreach, Pollution Prevention & Good Housekeeping

**PART 4: STORMWATER MANAGEMENT PROGRAM ADMINISTRATION**

**4.1 Organizational Structure**

The following org chart provides an overview of the MS4 program organization. The overall program implementation responsibility lies with the Town Administrator, with oversight from the mayor and town council. The Public Works Director and his staff implement the activities related to the MS4 system and SCM operation and maintenance, as well as street, landscaping and waste management. The Code Administrator implements activities related to post-construction. Both the Public Works Director and Code Administrator share responsibility for the IDDE and enforcement.

**Montreat MS4 Program Organization Chart**

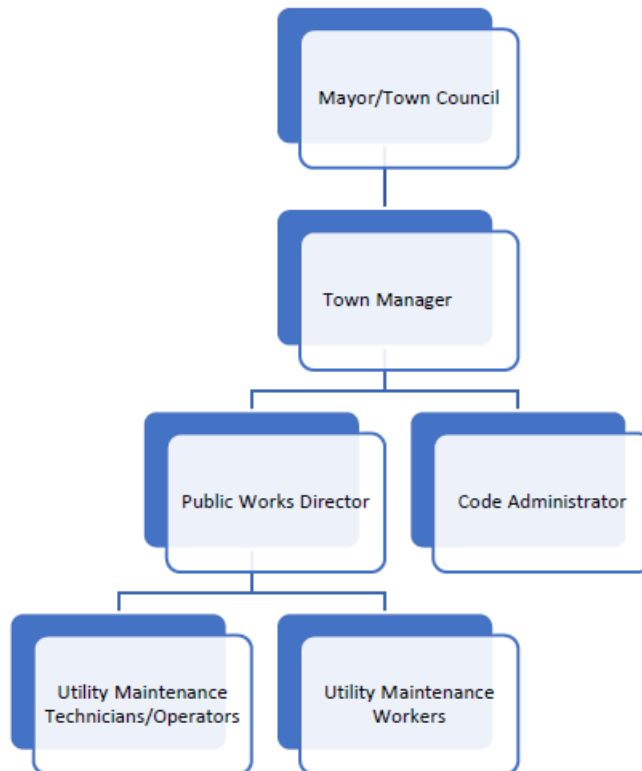


Table 8: Summary of Responsible Parties

SWMP Component	Responsible Position	Staff Name	Department
Stormwater Program Administration	Town Manager	Savannah Parrish	Administration

SWMP Management	Town Manager	Savannah Parrish	Administration
Public Education & Outreach	Town Manager	Savannah Parrish	Administration
Public Involvement & Participation	Town Manager	Savannah Parrish	Administration
Illicit Discharge Detection & Elimination	Public Works Director, Code Administrator	Barry Creasman Kayla DiCristina	Public Works Administration
Construction Site Runoff Control	Buncombe County Erosion Control Officer	James Guess	Planning & Development
Post-Construction Stormwater Management	Code Administrator	Kayla DiCristina	Administration
Pollution Prevention/Good Housekeeping for Municipal Operations	Public Works Director	Barry Creasman	Public Works
Municipal Facilities Operation & Maintenance Program	Public Works Director	Barry Creasman	Public Works
Spill Response Program	Public Works Director	Barry Creasman	Public Works
MS4 Operation & Maintenance Program	Public Works Director	Barry Creasman	Public Works
Municipal SCM Operation & Maintenance Program	Public Works Director	Barry Creasman	Public Works
Pesticide, Herbicide & Fertilizer Management Program	N/A		
Vehicle & Equipment Cleaning Program	N/A		
Pavement Management Program	Public Works Director	Barry Creasman	Public Works

Total Maximum Daily Load (TMDL) Requirements	N/A		
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#### 4.2 Program Funding and Budget

In accordance with the issued permit, the Town of Montreat 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 stormwater program is funded through the general revenue fund. Approximately \$55k is budgeted for FY24 as a percentage of the Code Administrator and Public Works staffing budgets and Public Works operations budget, as well for a contract for services with LOSRC. Current funding is sufficient for implementing the SWMP and complying with the MS4 Permit.

#### 4.3 Shared Responsibility

The Town of Montreat 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 Montreat 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 Montreat 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)
3.5 Construction Site Runoff Control Program	Buncombe County Erosion and Sediment Control	Y
3.2.2, 3.2.4, 2.1.7, 3.2.3, 3.6.(c), 3.3.2, 3.4.1, 3.4.4, 3.4.6, 3.7.3	Land of Sky Regional Council	Y
3.6.6 On-Site Domestic Wastewater Treatment	Buncombe County Health Department	N/A

#### 4.4 Co-Permittees

There are no other entities applying for co-permittee status under the NPDES MS4 permit number NCS000430 for the Town of Montreat. Table 10 summarizes contact information for each co-permittee.

Table 10: Co-Permittee Contact Information

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

#### 4.5 Measurable Goals for Program Administration

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

Table 11: Program Administration BMPs				
<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> Description of BMP	<b>B</b> Measurable Goal(s)	<b>C</b> Schedule for Implementation	<b>D</b> Annual Reporting Metric
<b>1.</b>	<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> Description of BMP	<b>B</b> Measurable Goal(s)	<b>C</b> Schedule for Implementation	<b>D</b> Annual Reporting Metric
<b>2.</b>	<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

**Table 11: Program Administration BMPs**

		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
<b>Permit Ref.</b>	<b>2.1.1: Adequate Funding and Staffing</b> The permittee shall maintain adequate funding and staffing to implement and manage the provisions of the SWMP and meet all requirements of this permit.			
<b>BMP No.</b>	<b>A</b> <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>3.</b>	<b>Adequate Funding and Staffing</b>			
	Evaluate program funding and staffing to determine if there are gaps affecting implementation.	1. Prepare gap analysis.	1. Permit Year 1	1. Yes/No Finding of adequate or inadequate.
		2. Evaluate options for addressing any gaps identified.	2. Permit Year 2	2. Yes/No
<b>Permit Ref.</b>	<b>2.2.2: Written Procedures</b> The Permittee shall maintain, and make available to the Division upon request, written procedures for implementing the six minimum control measures. Written procedures shall identify specific action steps, schedules, resources, and responsibilities for implementing the MCMs. Written procedures can be free standing or, where appropriate, integrated into the Stormwater Management Plan. The illicit discharge detection and elimination plan shall be free standing.			
<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>4.</b>	<b>Written Procedures</b>			
	Develop an implementation plan for the six MCMs including action steps, responsibilities, schedules and resources.	1. Prepare implementation plan.	1. Annually Permit Year 1-5	1. Yes/No

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

The Town of Montreat 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 Montreat is required to inform institutions and the general public of the hazards associated with illicit discharges, illegal dumping and improper disposal of waste.

Table 12: Summary of Target Pollutants & Audiences

Target Pollutants/Sources	Target Audience(s)
Litter	General Public, Residents, Montreat College, Montreat Conference Center
Yard Waste	Residents, Montreat College, Montreat Conference Center
Illicit Discharges	Residents, Montreat College, Montreat Conference Center
Sediment	Construction Sites
Illegal Dumping	Residents, Montreat College, Montreat Conference Center
Improper Disposal of Waste	Residents, Montreat College, Montreat Conference Center

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

Table 13: Public Education and Outreach BMPs				
<b>Permit Ref.</b>	<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>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>5.</b>	<b>Partnership with Land of Sky Council of Governments</b>			
	The Town will contract with the Land of Sky Regional Council (LOSRC) to implement programs and create materials for public education and outreach to residents, youth, and institutions within the Town’s jurisdiction. Includes social media.	1. Execute a legal agreement with LOSRC to provide educational materials and activities that target Town of Montreat audiences as listed in Table 12.	1. Permit Year 1.	1. Yes/No



**Table 13: Public Education and Outreach BMPs**

		2. Review agreement with LOSRC and update as needed.	2. Annually Permit Years 2-5.	2. Yes/No
		3. Provide education and outreach to target audiences on topics per Table 12 each year so that all topics and audiences have been addressed by permit year 5.	3. Permit Years 1-5.	3. Yes/No Report event type, number of contacts and topics addressed.
<b>6.</b>	<b>Update literature</b>			
	The Town will evaluate their current handout and, if necessary, create an updated brochure that can be used throughout the permit period. Key placement of brochures will be determined and distributed at Town Hall.	1. Inventory current literature. Evaluate whether current literature is appropriate for use and if not create and have printed new materials.	1. Permit Year 1.	1. Yes/No
		2. Place literature in key locations at the Town Hall facility. Replace monthly.	2. Permit Years 1-5.	2. Yes/No
<b>7.</b>	<b>Participate in a public event</b>			
	The Town will pass out general stormwater awareness literature at a minimum at one public event lead by the Town and display informative information related to stormwater.	1. Man a booth at one public event to distribute literature.	1. Permit Years 2-5.	1. Yes/No Contact hours
		2. For the events, create a display and/or other visual materials with specific information about pollutants of concern such as litter, nutrients, non-point source pollution, waste disposal. Include <i>how to help</i> material pertaining to the target audience(s).	2. Permit Year 2.	2. Yes/No
<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>A</b>	<b>B</b>	<b>C</b>	<b>D</b>

**Table 13: Public Education and Outreach BMPs**

<b>BMP No.</b>	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
<b>8.</b>	<b>Stormwater Page on the Town’s Website</b>			
	The Stormwater web page will be updated to include at a minimum the following stormwater related items: <ul style="list-style-type: none"> <li>• Links to pertinent permitting authorities.</li> <li>• Links to applicable ordinances.</li> <li>• The MS4 Permit and SWMP.</li> <li>• Hotline and instructions for reporting illicit discharges and other environmental issues.</li> <li>• Opportunities for public involvement.</li> <li>• General stormwater awareness information.</li> </ul>	1. Make improvements to the Stormwater web page to include listed items.	1. Permit Year 1.	1. Yes/No
		2. Maintain the web page, including any updates and resolving technical issues.	2. Permit Years 1-5.	2. Yes/No
<b>Permit Ref.</b>	<b>3.2.5: Stormwater Hotline</b> Measures for a stormwater hotline/helpline for the purpose of public education and outreach.			
<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>9.</b>	<b>Advertise the Stormwater Hotline</b>			
	Provide the hotline number and reporting protocol to the general public.	1. Provide the hotline and pertinent information on the Stormwater Web page and in all new stormwater literature.	1. Permit Year 1.	1. Yes/No
		2. Check hotline functionality.	2. Annually Permit Years 2-5.	2. Yes/No
<b>10.</b>	<b>Train Hotline Staff</b>			
	Train staff on SOP to direct hotline calls to appropriate responders.	1. Develop SOP for managing hotline calls.	1. Permit Year 1.	1. Yes/No
		2. Train staff on SOP.	2. Permit Years 1-5.	2. Number trained

**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 Montreat 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> Description of BMP	<b>B</b> Measurable Goal(s)	<b>C</b> Schedule for Implementation	<b>D</b> Annual Reporting Metric
<b>11.</b>	<b>Town Meetings</b>			
	Stormwater issues and program implementation items will be brought to the Board of Commissioners. Residents can provide input.	1. Advertise Board meetings and agendas on web site. Include stormwater public comment item on a specific agenda at least once per year.	1. Permit Years 1-5.	1. Yes/No
<b>12.</b>	<b>Stormwater Website Page</b>			
	Provide a contact person and e-mail address for citizen’s questions related to stormwater on the Stormwater website page.	1. Maintain contact information on website.	1. Permit Year 1.	1. Yes/No
		2. Maintain reporting form on website.	3. Permit Year 1.	3. Yes/No
<b>Permit Ref.</b>	<b>3.3.2: Volunteer Opportunities</b> Measures to provide volunteer opportunities designed to promote ongoing citizen participation.			
<b>BMP No.</b>	<b>A</b> Description of BMP	<b>B</b> Measurable Goal(s)	<b>C</b> Schedule for Implementation	<b>D</b> Annual Reporting Metric
<b>13.</b>	<b>Identify Volunteer Groups Existing in the Area</b>			
	Create a list of existing volunteer groups that could have potential for improving stormwater issues and reducing pollutants. Focus would be	1. Create a list of potential volunteer groups and document their main focus.	1. Permit Year 2.	1. Yes/No

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

	participation with residents, and/or students.	2. Contact at least one of the volunteer groups and establish an activity focused on stormwater issues.	2. Permit Years 2-5.	2. Yes/No
		3. Implement a minimum of one public participation activity focused on stormwater issues.	3. Permit Years 3-5.	3. Date and type of event, number of participants
<b>14.</b>	<b>Offer a Rain Barrel Workshop</b>			
	Create and implement a rain barrel workshop, to provide residents with a tool to reduce runoff.	1. Plan a rain barrel workshop. Decide how it will be advertised, who will run it, and what materials are needed.	1. Permit Year 2.	1. Yes/No
		2. Implement the rain barrel workshop.	2. Permit Year 3.	2. Yes/No Date of event and number of participants
<b>15.</b>	<b>Promote NC Stream Watch</b>			
	Provide information about NC Stream Watch on the Stormwater web page and in literature and events. Install a Stream Watch sign in a publicly accessible area.	1. Encourage residents to contribute to NC Stream Watch	1. Permit Year 4.	1. Yes/No Number of stream watch observations.

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

The Town of Montreat 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>	<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>16.</b>	<b>MS4 Major Outfalls and Municipal Storm Sewer System Map</b>			
	Maintain municipal storm sewer system map. Map to include inlets, pipes flow directions, major outfalls and streams.	1. Publish map online and link on stormwater page.	1. Permit Year 1.	1. Yes/No Report currently known number of major outfalls.
		2. Continuously update the MS4 Map.	2. Permit Years 2-5.	2. Yes/No Report number of major outfalls added and total.
<b>Permit Ref.</b>	<b>3.4.2: Regulatory Mechanism</b> Measures to provide an IDDE ordinance or other regulatory mechanism that provides legal authority to prohibit, detect, and eliminate illicit connections and discharges, illegal dumping and spills into the MS4, including enforcement procedures and actions.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
<b>17.</b>	<b>Maintain Legal Authority</b>			
	Review existing ordinance confirming the Town’s legal authority to enforce and take actions for prohibiting, detecting and eliminating illicit discharges and connections and illegal dumping and spills.	1. Review ordinance and make any necessary changes. Document any revisions.	1. Permit Year 1.	1. Yes/No

**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> Description of BMP	<b>B</b> Measurable Goal(s)	<b>C</b> Schedule for Implementation	<b>D</b> Annual Reporting Metric
<b>18.</b>	<b>Review and Improve IDDE Plan</b>			
	Review the IDDE Plan and make any necessary improvements.	1. Review annually and make necessary improvements to the IDDE Plan.	1. Permit Years 1-5.	1. Yes/No
		2. Implement/Enforce the IDDE Plan.	2. Annually Permit Years 1-5	2. Yes/No
<b>19.</b>	<b>Conduct dry weather screenings</b>			
	Inspect outfalls for illicit discharge during dry weather.	1. Inspect outfalls for illicit discharge no sooner than 48 hours after rainfall. Document inspections.	1. Annually Permit Years 1-5	1. Percent outfalls screened.
<b>Permit Ref.</b>	<b>3.4.4: IDDE Tracking</b> Measures for tracking and documenting the date(s) an illicit discharge, illicit connection or illegal dumping was observed, the results of the investigation, any follow-up of the investigation, the date the investigation was closed, the issuance of enforcement actions, and the ability to identify chronic violators.			
<b>BMP No.</b>	<b>A</b> Description of BMP	<b>B</b> Measurable Goal(s)	<b>C</b> Schedule for Implementation	<b>D</b> Annual Reporting Metric
<b>20.</b>	<b>Track all known illicit discharge, illicit connection and illegal dumping events</b>			

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

	Maintain a tracking mechanism for documenting where illegal activities took place, what was done to inform the violator, records of all correspondence, records of all activities related to the illegal activity and final resolutions.	1. Maintain an illicit discharge reporting form and work order system that can be used by the appropriate municipal departments for tracking of all activities related to the IDDE.	1. Permit Year 1-5	1. Yes/No
		2. Perform IDDE inspections using the reporting form.	2. Permit Years 1-5.	2. Yes/No Number of investigations, number of violations issued, number closed.
<b>Permit Ref.</b>	<b>3.4.5: Staff IDDE Training</b> Measures to provide training for municipal staff and contractors who, as part of their normal job responsibilities, may observe an illicit discharge, illicit connection, illegal dumping or spills. Training shall include how to identify and report illicit discharges, illicit connections, illegal dumping and spills. Each staff training event shall be documented, including the agenda/materials, date, and number of staff participating.			
<b>BMP No.</b>	<b>A</b> <b>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>21.</b>	<b>Staff Training</b>			
	Create a program to train Town staff in IDDE procedures and hotline protocol.	1. Develop training program.	1. Permit Year 1	1. Yes/No
		2. Train municipal staff that will be using the IDDE Plan and new employees that will be involved in IDDE, when hired.	2. Permit Year 2 and new employees within first year hired.	2. Yes/No Number trained
<b>Permit Ref.</b>	<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.			
<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>22.</b>	<b>Stormwater Hotline</b>			

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

	A Stormwater Hotline will be maintained for Town’s residents and businesses to report stormwater issues and illicit discharges, illegal dumping, and spills. The hotline number will be available on the Town’s Website and in educational literature.	1. Provide the hotline and pertinent information on the stormwater web page and in all new stormwater literature.	1. Permit Years 1-5.	1. Yes/No
23.	<b>Illicit Discharge Reporting System</b>			
	Maintain a reporting form to record the location, date and nature of the illicit discharge, illegal dumping, and/or spills.	1. Maintain a reporting form and work order system that can be used by the appropriate municipal departments for tracking of all activities related to the IDDE.	1. Permit Year 1	1. Yes/No Number reported
		2. Create a public reporting form on the stormwater web page.	2. Permit Year 2	2. Yes/No Number reported

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

In accordance with 15A NCAC 02H .0153, the Town of Montreat 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	Buncombe County Delegated SPCA Program*	15A NCAC Chapter 04, NCDEQ Approved Delegation, Interlocal Agreement/Joint Resolution, Local Ordinance	Buncombe County

\* The local delegated SPCA Program ordinance(s)/regulatory mechanism(s) can be found at: <https://www.buncombecounty.org/common/planning/ordinance-erosion-control.pdf>



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

<b>Table 17: Construction Site Runoff Control BMPs</b>				
<b>Permit Ref.</b>	<b>3.5.6: Public Input</b> Measures to provide and promote a means for the public to notify the appropriate authorities of observed erosion and sedimentation problems.			
<b>BMP No.</b>	<b>A</b>	<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>24.</b>	<b>Municipal Staff Training</b>			
	Train municipal staff who receive calls from the public on the protocols for referral and tracking of construction site runoff control complaints.	1. Train municipal staff on proper handling of construction site runoff control complaints.	1. Permit Year 1. Then as needed for new staff.	1. Number of staff trained
<b>25.</b>	<b>Stormwater Hotline and Town's Stormwater Page</b>			
	The Stormwater Hotline will be maintained for citizen's use for reporting sediment run-off from construction sites and for questions concerning construction site activities.	1. Provide the hotline and pertinent information on the Stormwater web page and in all new stormwater literature.	1. Permit Years 1-5.	1. Yes/No
<b>Permit Ref.</b>	<b>3.5.5: Waste Management</b> Measures to require construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impact to water quality.			
<b>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>26.</b>	<b>Ordinance for Waste Management</b>			
	Review ordinance for new construction and remodeling waste management and determine if additional detail is needed.	1. Review ordinance and revise if needed.	1. Permit Year 2.	1. Yes/No
		2. Maintain legal authority	2. Permit Year 2-5.	2. Yes/No
<b>27.</b>	<b>Waste Management Information Materials</b>			
	Develop information materials for contractors to address waste management on construction sites.	1. Create document that can be provided to building permit applicants and referenced on the Town's website.	1. Permit Year 3.	1. Yes/No

**PART 9: POST-CONSTRUCTION SITE RUNOFF CONTROL PROGRAM**

This SWMP identifies the minimum elements to develop, implement and enforce a program to address stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that are located within the Town of Montreat 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 Montreat implements the following State post-construction program requirements, which satisfy the NPDES Phase II MS4 post-construction site runoff control requirements as Qualifying Alternative Programs (QAPs) in the MS4 area(s) where they are implemented.

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

State QAP Name	State Requirements	Local Ordinance / Regulatory Mechanism Reference
None	N/A	N/A

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

Table 19: Summary of Existing Post-Construction Program Elements

Permit Requirements for <b>Plan Review and Approval</b>	Municipal Ordinance/Code Reference(s) and/or Document Title(s)	Date Adopted
3.6.2(a) Authority	Chapter K, Article III, #303, #318	2/11/2010
3.6.3(a) & 15A NCAC 02H.0153(c) Federal, State & Local Projects	Chapter K, Article III, #303	2/11/2010
3.6.3(b) Plan Review	Chapter K, Article III, #303, #304	2/11/2010
3.6.3(c) O&M Agreement	Chapter K, Article III, #309	2/11/2010
3.6.3(d) O&M Plan	Chapter K, Article III, #308	2/11/2010
3.6.3(e) Deed Restrictions/Covenants	Chapter K, Article III, #309, #312	2/11/2010
3.6.3(f) Access Easements	Chapter K, Article III, #312	2/11/2010
Permit Requirements for <b>Inspections and Enforcement</b>	Municipal Ordinance/Code Reference(s) and/or Document Title(s)	Date Adopted
3.6.2(b) Documentation	Chapter K, Article III, #310	2/11/2010
3.6.2(c) Right of Entry	Chapter K, Article III, #310	2/11/2010
3.6.4(a) Pre-CO Inspections	Chapter K, Article III, #304	2/11/2010
3.6.4(b) Compliance with Plans	Chapter K, Article III, #304	2/11/2010
3.6.4(c) Annual SCM Inspections	Chapter K, Article III, #310	2/11/2010
3.6.4(d) Low Density Inspections	Chapter K, Article III, #310	2/11/2010
3.6.4(e) Qualified Professional	Chapter K, Article III, #310	2/11/2010
Permit Requirements for <b>Fecal Coliform Reduction</b>	Municipal Ordinance/Code Reference(s) and/or Document Title(s)	Date Adopted
3.6.6(a) Pet Waste	Chapter K, Article III, #314	2/11/2010
3.6.6(b) On-Site Domestic Wastewater Treatment	Buncombe County Health Department Environmental Health Services	N/A

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>				
Permit Ref.	<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.			
BMP No.	A	B	C	D
	Description of BMP	Measurable Goal(s)	Schedule for Implementation	Annual Reporting Metric
28.	Standard Reporting			

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

	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 (i.e. Smaller Projects (5,000-10,000sf of disturbance)) and high density (>24% BAU or Larger Projects > 10,000sf of disturbance) 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>	<p><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.</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>
<b>29.</b>	<b>Evaluation and revision of ordinance</b>			
	Review stormwater ordinance and amend with changes where needed.	1. Evaluate current standards and determine if updates needed.	1. Permit Year 2	1. Yes/No
2. Proceed with required legal processes such as Board approvals.		2. Permit Year 3	2. Yes/No	

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

		3. Implement changes and update information materials.	3. Permit Year 4	3. Yes/No
<b>Permit Ref.</b>	<p><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).</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>
<b>30.</b>	<b>O&amp;M Agreement and Plan requirements</b>			
	Review both the agreement and plan requirements and ensure that these comply with 15A NCAC 02H .1050(12) and 15A NCAC 02H .1050(13)	1. Evaluate if O&M Agreement and Plan are compliant.	1. Permit Year 1.	1. Yes/No
		2. Proceed with changes if needed.	2. Permit Year 2	2. Yes/No
<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>
<b>31.</b>	<b>Inspection of Post Construction SCMs</b>			
	Develop a schedule for inspection of post construction SCMs.	1. Inspect all the post construction SCMs within the Town's jurisdiction and take appropriate actions for SCMs that are out of compliance.	1. Permit Year 1-5. Annually	1. Percentage of SCMs inspected.

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

<b>Permit Ref.</b>	<b>3.6.6: Fecal Coliform Reduction</b> Measures to control, to the maximum extent practicable, sources of fecal coliform per 15A NCAC 02H .1017(7). At a minimum, the program shall include: (a) A pet waste management component, which may be achieved by revising an existing litter ordinance, and (b) An on-site domestic wastewater treatment system component, if applicable, which may be coordinated with local county health department, to ensure proper operation and maintenance of such systems.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
<b>32.</b>	<b>Pet Waste Management</b>			
	Review pet waste management being implemented within the town. Evaluate is there is a need to expand this initiative.	1. Evaluate what is currently in place and update as needed.	1. Permit Year 2.	1. Yes/No
		2. Implement the pet waste management policy.	2. Permit Year 3-5.	2. Yes/No

## PART 10: POLLUTION PREVENTION AND GOOD HOUSEKEEPING PROGRAMS

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

Table 21: Pollution Prevention and Good Housekeeping BMPs				
<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. <i>[Please note that at a minimum, NCDEQ will require that all inventoried municipal facilities be inspected once per permit term to determine pollution potential, and facilities with potential be inspected at least annually]</i>			
<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>33.</b>	<b>Inventory of Municipal Facilities</b>			
	Create an inventory of all municipal facilities, including location, function, and document what activities or framework have the potential to generate stormwater runoff pollution.	1. List of all municipal facilities.	1. Permit Year 1.	1. Yes/No Number of facilities.
		2. Identify facilities with pollution potential that need to be inspected annually.	2. Permit Year 1.	2. Yes/No Number of facilities

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

		3. Inspect facilities with pollution potential, and identify and resolve any issues.	3. Annually Permit Years 2-5.	3. Yes/No Number of inspections.
34.	<b>Public Works Standard Operating Procedure (PW SOP)</b>			
	Maintain PW SOP with annual inspection and maintenance protocols for municipal facilities.	1. Describe inspection and maintenance protocols in SOP. Include inventory of municipal facilities.	1. Permit Year 1.	1. Yes/No
		2. Review in place SPCC plans and update as necessary.	2. Permit Year 3-5.	2. Yes/No
<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>
35.	<b>Spill Potential and Response Procedures</b>			
	Any municipal facility that stores or works with materials which have the potential to contribute to polluted run-off shall be identified and written spill response procedures put in place.	1. Create written spill response procedures and provide to staff. Consider pertinent locations to post document.	1. Permit Year 2.	1. Yes/No
		2. Train staff in SPCC procedures.	2. Permit Years 2, and within first year of new hire	2. Yes/No 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>
36.	<b>MS4 Operation &amp; Maintenance (O &amp; M) Plan</b>			
	Develop a proactive plan for MS4 system maintenance which requires regular inspections and maintenance and verify, document, and prioritize maintenance activities identified by inspections or citizen reports.	1. Develop a SOP that includes inspection schedules, standard documentation, staff responsibilities, and proper maintenance training.	1. Permit Year 1.	1. Yes/No



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

<b>37.</b>	<b>Staff Training</b>			
	Provide training to municipal staff to minimize pollutants in the stormwater collection system and prevent unnecessary damage and wear on the system.	1. Develop or identify an appropriate training program.	1. Permit Year 1	1. Yes/No
		2. Provide training for all existing and new employees with MS4 responsibilities.	2. Permit Year 2, and as needed with new hires	2. Yes/No Number trained
<b>38.</b>	<b>MS4 Inspections and Maintenance</b>			
	Perform inspections and maintenance on MS4 system.	1. Maintain a reporting form to document inspection protocol and record inspections.	1. Permit Year 1.	1. Yes/No
		2. Perform regular inspections in accordance with the SOP (100% of inlets and major outfalls annually).	2. Permit Years 1-5.	2. Yes/No Report number of inspection and maintenance activities.
<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>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>39.</b>	<b>Inventory and Mapping of Municipal Structural SCMs</b>			
	Develop and maintain a current inventory of Town-owned structural SCMs and reflect those structures on the Town’s MS4 map.	1. Create inventory of municipally owned SCMs.	1. Permit Year 1	1. Yes/No Number of municipal SCMs.
		2. Update MS4 map with municipal SCMs.	2. Permit Year 2 -5.	2. Yes/No
<b>40.</b>	<b>Municipal SCM Inspection and Maintenance</b>			
	Perform inspections and maintenance of municipal SCMs.	1. Inspect and maintain the SCMs annually. Document inspection dates and where the maintenance took place.	1. Permit Years 1-5.	1. Yes/No Number of inspections
<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>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**

<b>Pesticide, Herbicide, Fertilizer Applicator Training</b>				
	N/A – staff does not apply pesticides, herbicide and fertilizers	N/A	N/A	N/A
<b>Permit Ref.</b>	<b>3.7.6: Vehicle and Equipment Maintenance Program</b> Measures to prevent and minimize contamination of stormwater runoff from areas used for municipal vehicle and equipment maintenance and/or cleaning. The permittee shall ensure that municipal industrial facilities subject to NPDES industrial permitting comply with those permit requirements, provide routine pollution prevention training to staff, perform routine inspections, and establish specific frequencies, schedules, and documentation.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
<b>Vehicle and Equipment Cleaning and Maintenance Facility Inspection</b>				
	N/A – staff does not clean and maintain vehicles	N/A	N/A	N/A
<b>Permit Ref.</b>	<b>3.7.7: Pavement Management Program</b> Measures to reduce pollutants in stormwater runoff from municipally owned streets, roads, and parking lots within the permittee’s corporate limits. The permittee shall implement measures to control litter, leaves, debris, particulate and fluid pollutants associated with vehicles, and establish specific frequencies, schedules, and documentation.			
<b>BMP No.</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
	<b>Description of BMP</b>	<b>Measurable Goal(s)</b>	<b>Schedule for Implementation</b>	<b>Annual Reporting Metric</b>
<b>41.</b>	<b>Street Cleaning</b>			
	Maintain streets so that they are clear of litter, leaves and debris.	1. Collect leaves and brush on a regular schedule. Document collection dates.	1. Permit Years 1-5.	1. Yes/No Volume of leaves collected
<b>42.</b>	<b>Vehicle Pollutant Management</b>			
	Implement measures to prevent and reduce pollution from vehicles.	1. Provide spill kits and training to staff for municipal vehicles.	1. Permit Year 2.	1. Yes/No
		2. Provide public education on vehicle pollution prevention.	1. Permit Year 3.	2. Yes/No