

**Stormwater Management Plan
Town of Rutherford College
NCS000480**

March 30, 2021



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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 Rutherford College 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 Rutherford College 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 NCS000480, 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 Rutherford College and located within the corporate limits of the Town of Rutherford College.

In preparing this SWMP, the Town of Rutherford College 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.

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.

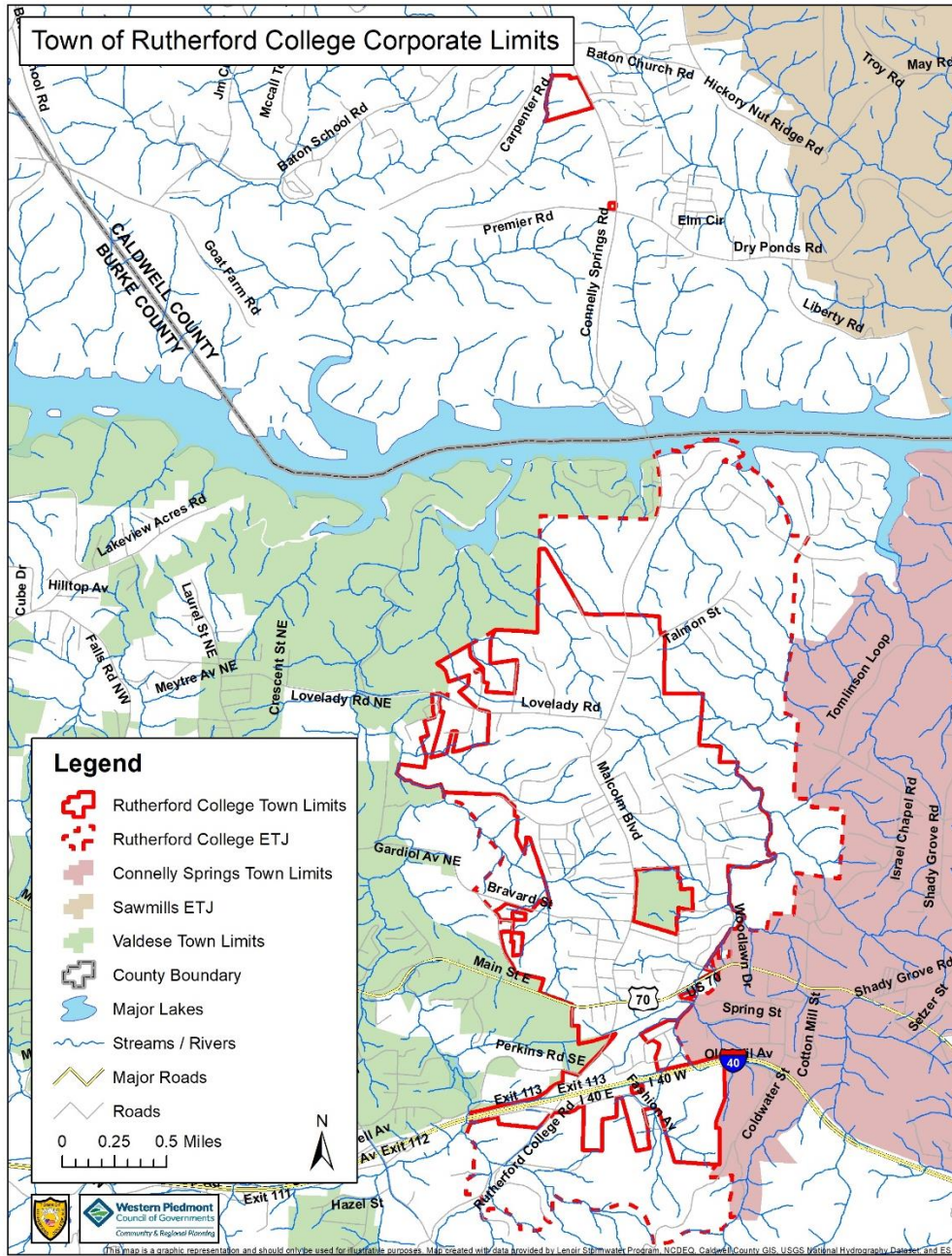
- I am a principal executive officer or ranking elected official.
- I am a duly authorized representative and have attached the authorization made in writing by a principal executive officer or ranking elected official which specifies me as:
 - A specific individual having overall responsibility for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

| | |
|---|-------------------------|
| <i>Signature:</i> | |
| <i>Name:</i> | <i>Kenneth Geathers</i> |
| <i>Title:</i> | <i>Town Manager</i> |
| Signed this <input type="text"/> day of _____ 20 <input type="text"/> . | |

PART 3: MS4 INFORMATION

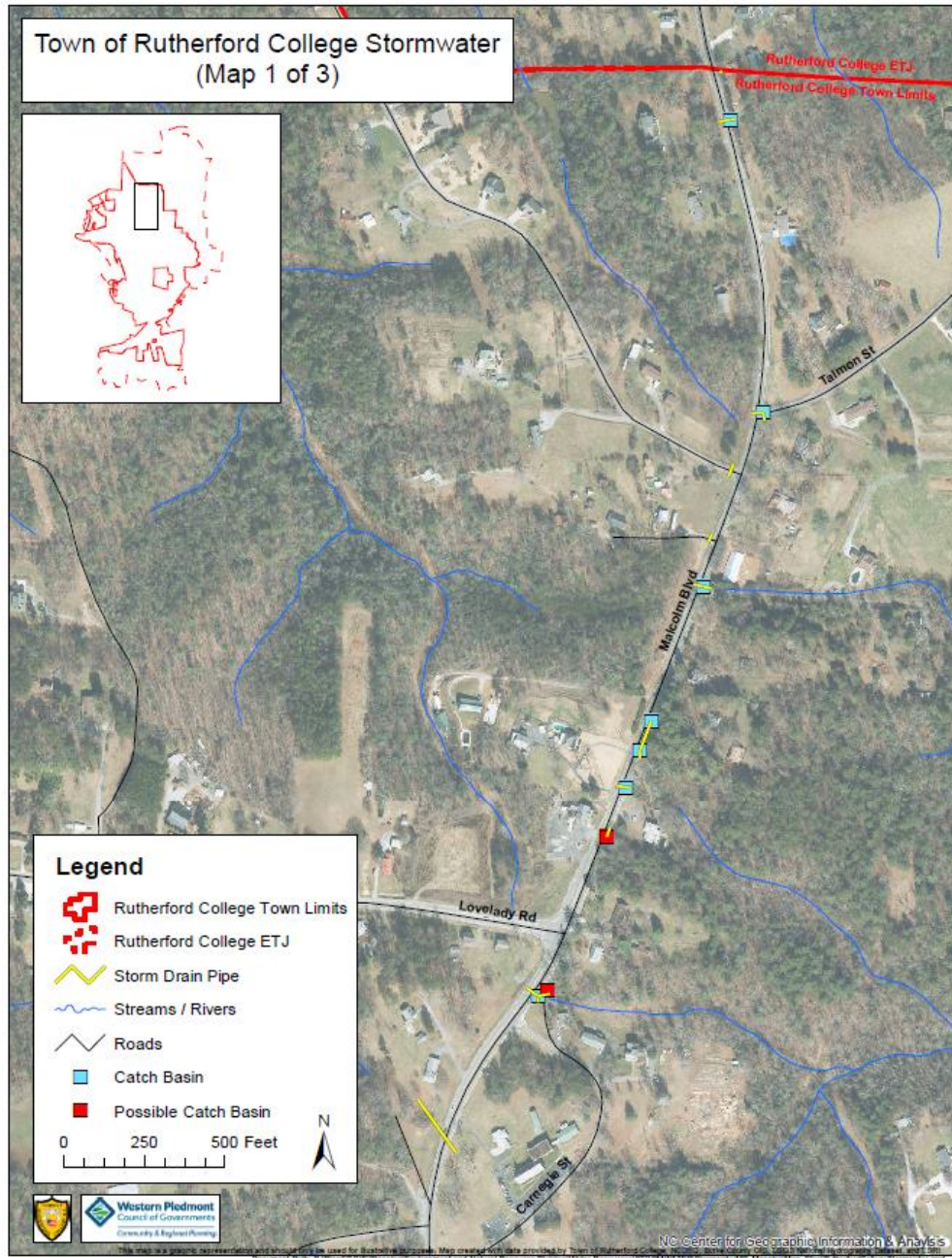
3.1 Permitted MS4 Area

This Stormwater Management Plan (SWMP) applies throughout the corporate limits of the Town of Rutherford College, including all regulated activities associated with the discharge of stormwater from the MS4. The map below shows the corporate limits of Town of Rutherford College as of the date of this document.

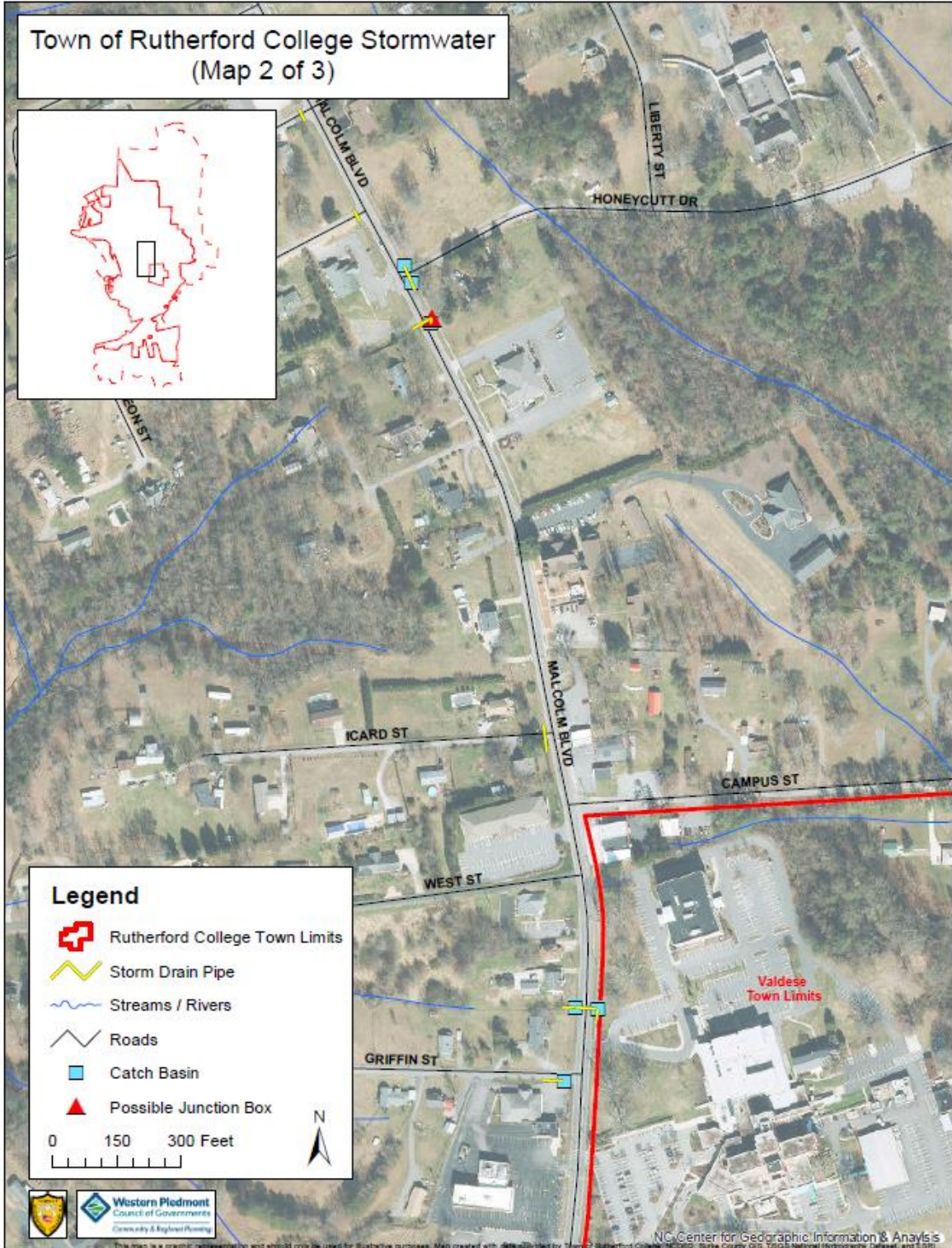
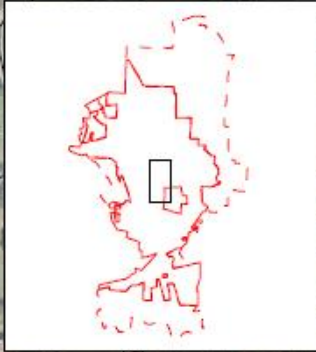


3.2 Existing MS4 Mapping

The current MS4 mapping includes all required elements for compliance. Below are a series of maps that show the locations of the catch basins, junction boxes, and drainage manholes within the City Limits. (Reference BMP 19).



Town of Rutherford College Stormwater
(Map 2 of 3)



Legend

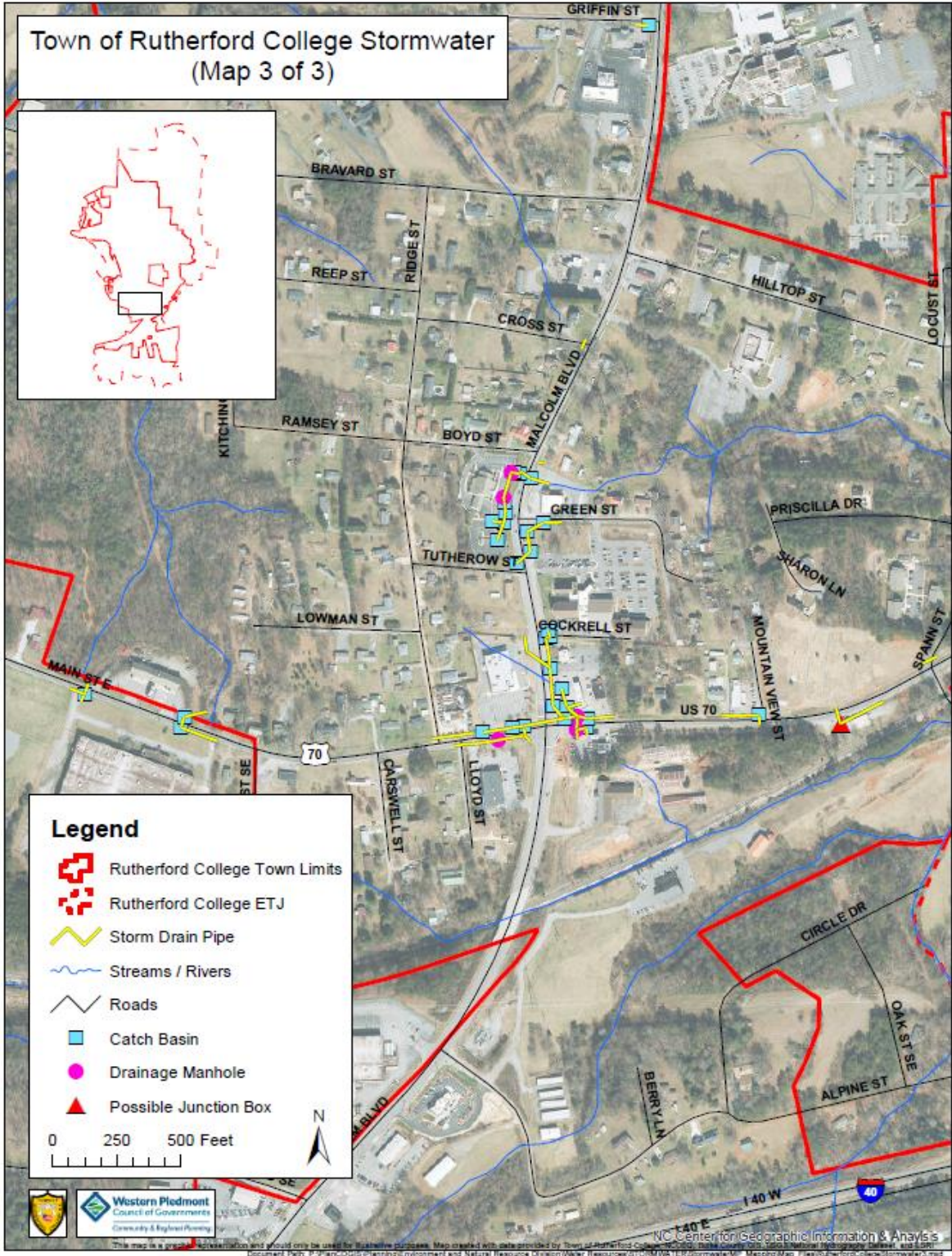
- Rutherford College Town Limits
- Storm Drain Pipe
- Streams / Rivers
- Roads
- Catch Basin
- Possible Junction Box

0 150 300 Feet

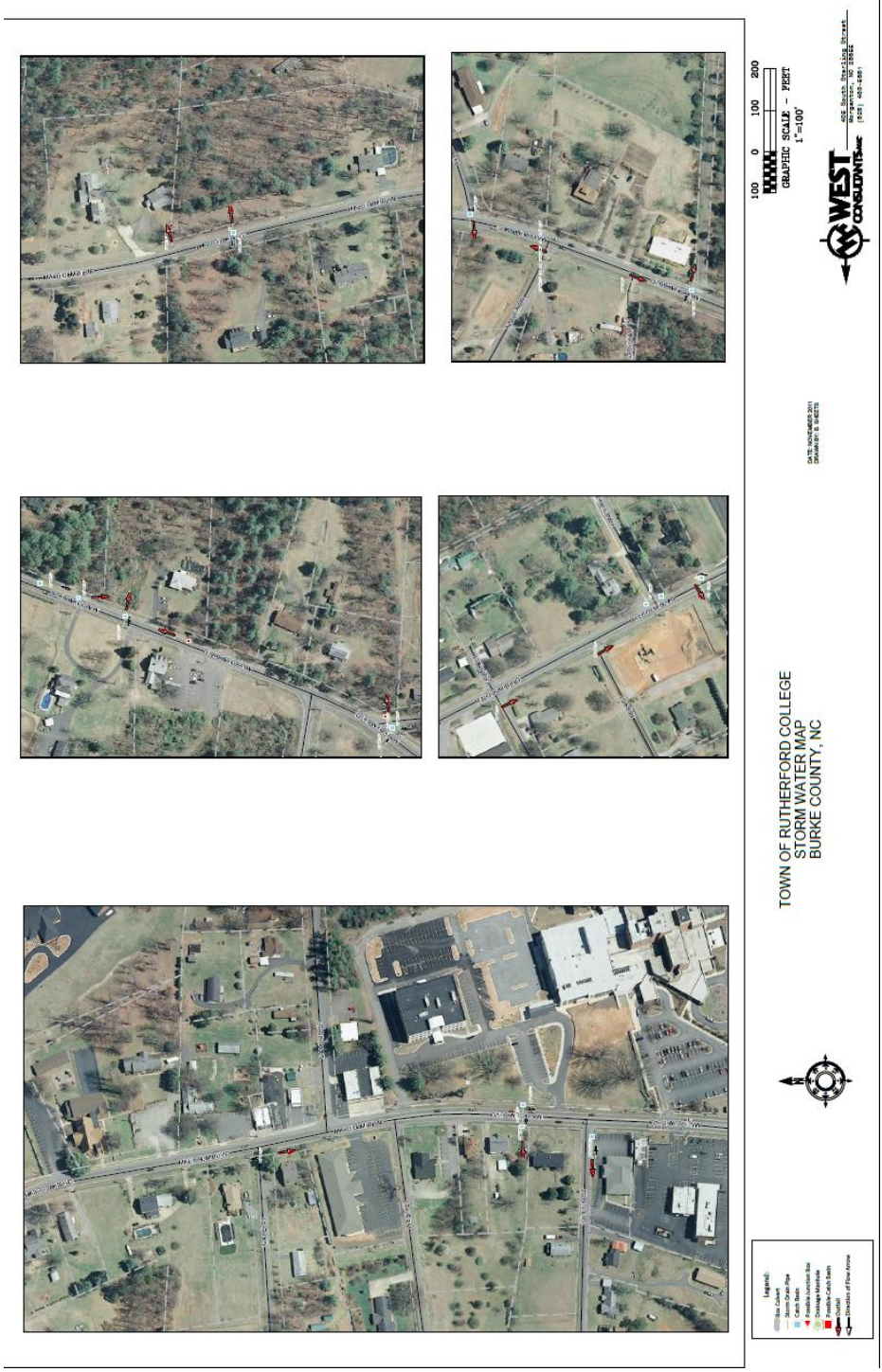
N



This map is a graphic representation and should not be used for legislative purposes. Map created with data collected by the Rutherford College, Burke County and local National Hydrography Dataset, and GIS. Licensed from the National Planning Commission and National Resource Inventory. Resources: NCEMVA Information Mapping Map, www.rutherfordcollege.com/mx2012



The following set of maps show the direction of flow and the major outfalls within Rutherford College Town limits. Further mapping is outlined in BMP 19.





Legend:
 Box Culvert
 Storm Drain Pipe
 Catch Basin
 Possible Junction Box
 Drainage Alternate
 Possible Catch Basin
 Outlet
 Direction of Flow Arrow

DATE: MARCH 30, 2021
 DRAWN BY: J. B. BERRY

TOWN OF RUTHERFORD COLLEGE
 STORM WATER MAP
 BURKE COUNTY, NC

1" = 100'
 GRAPHIC SCALE - FEET
 100 0 100 200

WEST CONSULTANTS, INC.
 455 South Hargett Street
 Raleigh, NC 27601
 (919) 444-1001

Table 1: Summary of MS4 Mapping

| | | |
|-------------------------------|----|-------|
| Percent of MS4 Area Mapped | 90 | % |
| No. of Major Outfalls* Mapped | 29 | total |

**An outfall is a point where the MS4 discharges from a pipe or other conveyance (e.g. a ditch) directly into surface waters. Major outfalls are required to be mapped to meet permit requirements. A major outfall is a 36-inch diameter pipe or discharge from a drainage area > 50-acres; and for industrial zoned areas a 12-inch diameter pipe or a drainage area \geq 2-acres.*

3.3 Receiving Waters

The Town of Rutherford College MS4 is located within the Catawba 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 |
|----------------------|--------------------------|------------------------------|--|
| Catawba River | 11-(37) | WS-IV, B, CA | n/a |
| Hoyle Creek | 11-45-(0.5 & 2) | WS-IV, CA | n/a |
| Island Creek | 11-46-(0.5) | WS-IV, CA | n/a |
| Smith Branch | 11-46-1 | WS-IV | n/a |

3.4 MS4 Interconnection

The Town of Rutherford College MS4 is interconnected and directly receives stormwater from the Town of Valdese MS4 (reference BMP 19); however the Town of Rutherford College MS4 does not directly discharge stormwater into another MS4.

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

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

3.5 Total Maximum Daily Loads (TMDLs)

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

Table 3: Summary of Approved TMDLs

| Water Body Name | TMDL Pollutant(s) | Stormwater Waste Load Allocation (Y/N) | Water Quality Recovery Program (Y/N) |
|-----------------|-------------------|--|--------------------------------------|
| N/A | N/A | N | N |

3.6 Endangered and Threatened Species and Critical Habitat

Significant populations of threatened or endangered species and/or critical habitat are/are not 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>Glyptemys muhlenbergii</i> | Bog Turtle | Vertebrate | T (S/A) |
| <i>Glaucomys sabrinus coloratus</i> | Carolina northern flying squirrel | Vertebrate | E |
| <i>Myotis septentrionalis</i> | Northern long-eared bat | Vertebrate | T |
| <i>Corynorhinus townsendii virginianus</i> | Virginia big-eared bat | Vertebrate | E |
| <i>Alasmidonta varicosa</i> | Brook floater | Invertebrate | ARS |
| <i>Ophiogomphus edmundo</i> | Edmons's Snaketail | Invertebrate | ARS |
| <i>Macromia margarita</i> | Margarita River skimmer | Invertebrate | ARS |
| <i>Microhexura montivaga</i> | Spruce-fir moss spider | Invertebrate | E |
| <i>Hexastylis naniflora</i> | Dwarf-flowered heartleaf | Vascular Plant | T |
| <i>Liatris helleri</i> | Heller's blazing star | Vascular Plant | T |
| <i>Hedyotis purpurea</i> var. <i>montana</i> | Roan Mountain Bluet | Vascular Plant | E |

3.7 Industrial Facility Discharges

The Town of Rutherford College 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 |
|---------------|---------------------|
| NCG170393 | Aquafil O'Mara Inc. |
| NCGNE0258 | BSN-Jobst, Inc. |

3.8 Non-Stormwater Discharges

The water quality impacts of non-stormwater discharges have been evaluated by the Town of Rutherford College as summarized in Table 6 below. The unpermitted non-stormwater flows listed as incidental do not significantly impact water quality. The Town of Rutherford College 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 Department of Environmental Quality has not required that other non-stormwater flows be specifically controlled by the Town of Rutherford College.

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/surfactants have been evaluated by the Town of Rutherford College to determine whether they may significantly impact water quality. The Town of Rutherford College will address the possibility of the below mentioned water quality impacts through public education and good housekeeping, as outlined in Part 5, BMP 3-7, and Part 10 BMP 45-47, 49, 53, 54, 56, 57 and 61 with a focus on the training of good housekeeping practices.

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

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 it. In addition, the Town of Rutherford College has evaluated schools, homeowners, construction sites and businesses as target audiences that are likely to have significant stormwater impacts.

Within the table below the following target pollutants have been commonly found to be concerns within the community.

Litter: Illegal dumping has occurred within the Town.

Cases general residential dumping have been noted by Town employees. This litter poses a threat to both our water bodies and the MS4 infrastructure, as the litter can create clogs and backups that damage the pipelines leading back to the stream. Some litter even poses a threat to groundwater if chemical leaching or breakdown of components into heavy metals occurs due to weathering of the litter. The dumping has been found typically road side but also in secluded urban areas.

Sediment: Previous installed erosion control measure have been removed or fallen

Sediment buildup is largely attributed to mismanaged construction sites with fallen or incorrectly installed sediment fences. It has been noticed in both reports from citizens and by code enforcement officers that there are several cases of construction sites not maintaining their erosion control fences during work. This has led to sediment buildup near storm drains, onto down slope private properties, and in some cases causing water to build up in nearby properties as the sediment is limiting the drains ability to remove runoff. In all cases code enforcement has responded and had the issue solved, but even being down for a short time can prove to have significant effects. Erosion control fences are required for sediment control permits during construction by the DEQ throughout the entire construction process.

Gray Water: Straight piping washing machines out of the house

Rarely, it has been noted a few homes have had their washing machines straight-piped out of their homes by creating makeshift piping using water hoses exit at windows. Homes are to be connected to the appropriate sewer system. This proves to be a source of detergents/soaps entering our storm drains in residential neighborhoods. In addition: residential, charity, and municipal car washes allow for soaps or waxes to enter the storm drain when vehicles are not being cleaned in the correct areas (such as vegetated patches or in areas that do not have storm drains). This allows for toxic contaminants to enter our waterways via the storm drain system.

Fats Oils and Grease: Restaurants could possibly empty grease traps or not obtain a grease trap.

The Health Department has reported restaurants not maintaining, or even owning, grease traps. This has led to cases of the restaurants either illegally dumping the grease or allowing the grease to drip onto

nearby impermeable surface – which would eventually lead to water quality issues. Overflow from a lack of maintenance or throwing out the grease with general waste contributes to this problem. This is a health violation since the grease poses a physical risk, but it also can impair water bodies with an influx of water insoluble grease going down the storm drain.

Chemicals: Totes have been noted in industrial areas, which could pose a risk.

Town staff have noticed containers within manufacturing facilities that have unmarked chemicals. The totes are unlabeled in select industrial sites, leading to potential soil and water contamination, and/or incorrect spill cleanup procedure. In addition to not labeling the containers correctly, the Town has noted that the containers are not being correctly stored in a way to minimize risk to the water bodies from seepage, damage to the containers, or spills.

Animal Operations/Urban Farming: A challenge to ensuring water quality for several factors.

Animal operations are agriculture operations that raise cows, pigs, chickens, or other livestock as a product, be it from meat or byproducts of the animal, the latter being more problematic as the excess nutrients will lead to eutrophication which can eventually causing hypoxia in the water body. In a similar vein, agricultural runoff often carries excess fertilizer which also will cause eutrophication in streams with its cascading effects.

Underground storage tanks: Storage devices installed below ground that contain hazardous materials/waste.

These tanks can contain gasoline, fuels such as propane, industrial chemicals/oils, and most often human waste in areas not directly connected to the sanitary sewer. Any underground storage tank must be well maintained/monitored, and correctly installed due to the risk of them leaking. The leaks can cause whatever chemical the tank is storing to leak into the ground, harming the soil, groundwater/water table, and even surface waters as they are being fed from groundwater. If a fuel or industrial chemical tank is leaking, the chemical will leach into the soil – leading to toxic soil, contaminated groundwater, and possibly impairing a stream/water body. If a septic tank is leaking, it can overwhelm the natural processes of the soil (infiltration) leading to nutrient overload in streams fed by groundwater, or allowing pathogens to enter, increasing the risk of disease.

Illicit discharges: Originate from a variety of sources, with an equally varied number of effects dependent on the chemical that is released.

Typically, illicit discharges come from businesses, residents or municipal facilities who dump chemicals into storm drains either incidentally due to a lack of Illicit Discharge & Detection Elimination (IDDE) education or general carelessness. These chemicals can vary greatly, and can include grease, oils, chemicals, cleaning solutions, paints, metals, etc. This is a recognized problem as we have several 303(d) streams impaired from causes related to substances or attributions given to unclean discharges into the streams - in addition to reports generated by the municipality.

Illegal dumping: When residents, businesses, or municipal employees dump waste randomly in non-permitted dumping areas.

This waste can widely vary, causing a variety of problems. For example, citizens dumping televisions on the side of the road to avoid dumping fees, which allows for the metals or chemicals inside the tv to leach out as stormwater passes it (mercury, lead, and other metals). It can be a case of businesses dumping waste in watershed areas where runoff passes through the waste, either carrying it, or residuals of the waste into water bodies. It can also be a case of graders dumping sediment into areas without the correct allowances/precautions. The debris and chemicals accumulate over time and lead to chemical impairments, pH issues, turbidity impairments, or debris entering the stream/MS4 system.

Improper disposal of waste:

Improper disposal of waste is problematic because it allows chemicals, or difficult to manage waste, to enter the environment in ways that may be hard to track. For example; not giving a car battery to the correct waste management facility can allow for battery acid and lead to enter the soil which drains/collects in the groundwater. This problem has been noticed by municipal waste managers and is difficult to track as often the improper disposal waste is mixed in with the standard refuse. Other examples include grease going down sinks clogging MS4 systems, chemicals from batteries leaching into the groundwater, oil from oil changes not going to the correct facility, etc.

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, Businesses, Schools | Public Education & Outreach Public Participation |
| Sediment | Construction Activity | Public Education & Outreach, Construction Program Post-construction Program |
| Gray water | Residential | Illicit Discharge Public Education & Outreach |
| Fats, Oils and Grease | Businesses (Restaurants) | Illicit Discharge Public Education & Outreach |
| Chemicals | Industrial, Business and Residential | Illicit Discharge Public Education & Outreach Good Housekeeping |
| Animal Operations | Commercial/Bona fide Farms/Urban Farming | Illicit Discharge Public Education & Outreach |
| Underground Storage Tanks | Business and Residents | Illicit Discharge Public Education & Outreach |
| Illicit Discharges | General Public, Businesses, Municipal Employees | Illicit Discharge Public Education & Outreach Good Housekeeping |
| Illegal Dumping and Improper Disposal of Waste | General Public, Businesses, Municipal Employees | Illicit Discharge Public Education & Outreach Good Housekeeping |

PART 4: STORMWATER MANAGEMENT PROGRAM ADMINISTRATION

4.1 Organizational Structure

The Town of Rutherford College has contracted Western Piedmont Council of Governments (WPCOG) to coordinate Stormwater Management Plan development/writing efforts, to ensure the Town is facilitating Best Management Practices to protect water quality. The Town of Rutherford College will be the primary operator of this stormwater program. Staff will be trained in handling internal procedures and reports of stormwater issues/violations. WPCOG be implementing the Public Education & Outreach, and the Public Involvement & Participation on behalf of the Town. The following organizational chart is broken down by the six elements associated with Stormwater Management. Each of the positions under the elements will report back to the primary manager and then on to the Stormwater Program Administrator.

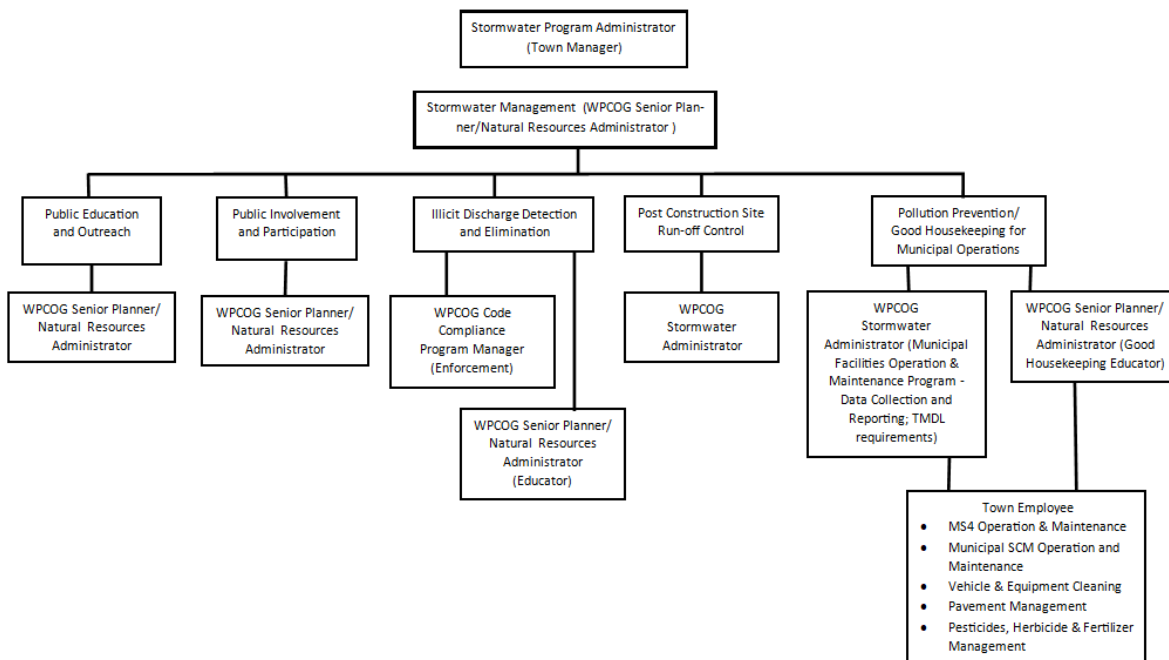


Table 8: Summary of Responsible Parties

| SWMP Component | Responsible Position | Staff Name | Department |
|-----------------------------------|------------------------------|------------------|--|
| Stormwater Program Administration | Town Manager | Kenneth Geathers | Administration, Town of Rutherford College |
| SWMP Management | WPCOG Senior Planner/Natural | Johnny Wear | WPCOG, Community and Regional Planning |

| | | | |
|---|--|---------------------------------|--|
| Public Education & Outreach | WPCOG Senior Planner/Natural Resources Administrator | Johnny Wear | WPCOG, Community and Regional Planning |
| Public Involvement & Participation | WPCOG Senior Planner/Natural Resources Administrator | Johnny Wear | WPCOG, Community and Regional Planning |
| Illicit Discharge Detection & Elimination | Illicit Discharge Officer | Todd Justice Patrick DeMauro | WPCOG, Community and Regional Planning |
| Construction Site Runoff Control | N/A | N/A | NCDEQ – Asheville Regional Office |
| Post-Construction Stormwater Management | Stormwater Administrator | Jack Cline | WPCOG, Community and Regional Planning |
| Pollution Prevention/Good Housekeeping for Municipal Operations | Stormwater Administrator | Jack Cline | WPCOG, Community and Regional Planning |
| Municipal Facilities Operation & Maintenance Program | Stormwater Administrator | Jack Cline | WPCOG, Community and Regional Planning |
| Spill Response Program | Utility Director Stormwater Administrator | John Leger Jack Cline | Town of Rutherford College Public Works WPCOG Community and Regional Planning, Volunteer/Town Fire Department, if applicable |
| MS4 Operation & Maintenance Program | Utility Director | John Leger | Town of Rutherford College Public Works |
| Municipal SCM Operation & Maintenance Program | Utility Director Stormwater Administrator | John Leger Jack Cline | Town of Rutherford College Public Works WPCOG Community and Regional Planning |
| Pesticide, Herbicide & Fertilizer Management Program | Utility Director | John Leger | Town of Rutherford College Public Works |

| | | | |
|--------------------------------------|------------------|------------|---|
| Vehicle & Equipment Cleaning Program | Utility Director | John Leger | Town of Rutherford College Public Works |
| Pavement Management Program | Utility Director | John Leger | Town of Rutherford College Public Works |

4.2 Program Funding and Budget

In accordance with the issued permit, the Town of Rutherford College 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 DEQ annually.

As mentioned previous, WPCOG was contracted to write the Town of Rutherford College’s Stormwater Management Plan, for a rate of \$8,000.00. Also, the Town has a one-year contract (which will need to be modified, adopted, and signed every year) with Western Piedmont Council of Governments for the following services: Public Education & Outreach Program and Public Involvement & Participation Program. The current one year contract (July 1, 2019 and ending June 30, 2020) amount is \$2,845.00.

The Town of Rutherford College will be using Town staff, and on occasion West Consultants, to implement Illicit Discharge Detection and Elimination Program, Post-Construction Site Runoff Control Program, and Pollution Prevention and Good Housekeeping Programs. The Town has allocated \$11,500.00 toward this effort.

The Town will be responsible for the cost of the annual NPDES permit renewal, which is to be paid to the state. Any fees charged to the development community for BMP Inspections, Plan Review, and other associated fees will help offset this cost to the town. The Town reserves the right to apply stormwater utility fees to supplement stormwater management costs; these fees would be collected by the Town through tax or utility bills. The goal would be for the funds collected to support the stormwater program through stream repairs and other water quality efforts.

Should the Town of Rutherford College choose not to renew the existing one-year contract with WPCOG, prior to the last month, a revision to the existing NPDES permit and Stormwater Management Plan would need to occur. The Town of Rutherford College would be required to renew the one-year contract for five years straight to fully carry out the 5 year NPDES permit cycle. Any changes to the partners or measures in this document will need to be reviewed and approved by NCDEQ.

4.3 Shared Responsibility

Beginning July 2019, the Town of Rutherford College will be responsible to implement the following minimum control measures, with the aid of WPCOG (entity), which are as stringent as the corresponding NPDES MS4 Permit requirement. The Town of Rutherford College 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 Rutherford College, nor the other entity fully performs the permit obligation. Table 9 below summarizes individual responsibilities for each program.

Table 9: Shared Responsibilities

| SWMP BMP or Permit Reference | Implementing Entity & Program Name | Legal Agreement (Y/N) |
|---|---|-----------------------|
| General Requirements | Town of Rutherford College | N |
| Public Education and Outreach Program | WPCOG Stormwater Partnership | Y |
| Public Involvement and Participation Program | WPCOG Stormwater Partnership | Y |
| Illicit Discharge Detection and Elimination Program | WPCOG Stormwater Partnership | Y |
| Construction Site Runoff Control Program | NCDEQ | N/A |
| Post-Construction Site Runoff Control Program | WPCOG Stormwater Partnership West Consultants PLLC | Y Y |
| Pollution Prevention and Good Housekeeping Programs | WPCOG Stormwater Partnership | Y |

4.4 Co-Permittees

There are no other entities applying for co-permittee status under the NPDES MS4 permit number NCS000480 for the Town of Rutherford College.

4.5 Measurable Goals for Program Administration

Referencing, MS4 Inspection Report for the Town of Rutherford College - Program Implementation, Documentation & Assessment, Permit Citation - II.A.2. Stormwater Plan Implementation & Evaluation, II.A.3. Keeping the Stormwater Plan Up to Date, II.A.4. Availability of the Stormwater Plan, II.A.5. Stormwater Plan Modifications and II.A.7 Written Procedures; the Town has not evaluated the performance and effectiveness of the program and has not develop any procedures for doing so. In order to meet the State requirements for this section, a self-assessment of the effectiveness of the program components will be completed annually. Written procedures, otherwise known as, the Stormwater Management Plan: SWMP update, has been drafted, but not adopted at this time. The SWMP will be adopted during Permit Year One of the NPDES permit cycle following acceptance of the SWMP and issuance of the NPDES permit. Included in the SWMP the Town will be required to establish written agreements with entities that are performing work on the Town’s behalf (II.A.6.).

MS4 Inspection Report for the Town of Rutherford College - Program Implementation, Documentation & Assessment, Permit Citation - III.A. Program Documentation; the Town maintained some documentation regarding inspections, but no other aspect of the program components. There was an overall lack of documentation relating to the Town’s stormwater program (e.g., no documentation for inspections, maintenance activities, or educational programs).

MS4 Inspection Report for the Town of Rutherford College - Program Implementation, Documentation & Assessment, Permit Citation - III.B. Annual Report Submittal: MS4 annual reports have not been submitted. Further, no fiscal analysis was provided (Permit Citation - IV.B). Within the below BMPs Annual Report are a required submittal that will occur on August 31st each permit year and will include all applicable parts of the NPDES MS4 permit.

The Town of Rutherford College will manage, document, and report the following Best Management Practices (BMPs) for the administration of the Stormwater Management Program using Public Education & Outreach, Public Involvement & Participation, Illicit Discharge Detection & Elimination, Post-Construction Site Runoff Control, and Pollution Prevention & Good Housekeeping.

Table 11: Program Administration BMPs

| | | | | |
|--------------------|--|---------------------------|------------------------------------|--------------------------------|
| Permit Ref. | 2.1.2 and Part 4: Annual Self-Assessment Measures to evaluate the performance and effectiveness of the SWMP program components at least annually. Results shall be used by the permittee to modify the program components as necessary to accomplish the intent of the Stormwater Program. The self-assessment reporting period is the fiscal year (July 1 – June 30). | | | |
| BMP No. | A | B | C | D |
| | Description of BMP | Measurable Goal(s) | Schedule for Implementation | Annual Reporting Metric |

Table 11: Program Administration BMPs

| | | | | |
|--------------------|--|---|--|---|
| 1. | Annual Self-Assessment | | | |
| | Perform an annual evaluation of SWMP implementation, suitability of SWMP commitments and any proposed changes to the SWMP utilizing the NCDEQ Annual Self-Assessment Template. | 1. Prepare, certify, and submit the Annual Self-Assessment to NCDEQ prior to August 31 each year. | 1. Annually Permit Years 1 – 4 | 1. Yes/No |
| Permit Ref. | 1.6: Permit Renewal Application Measures to submit a permit renewal application no later than 180 days prior to the expiration date of the NPDES MS4 permit. | | | |
| BMP No. | A Description of BMP | B Measurable Goal(s) | C Schedule for Implementation | D Annual Reporting Metric |
| 2. | Permit Renewal Application | | | |
| | Audit stormwater program implementation for compliance with the permit and approved SWMP, and utilize the results to prepare and submit a permit renewal application package. | 1. Participate in an NPDES MS4 Permit Compliance Audit, as scheduled and performed by EPA or NCDEQ. | 1. TBD – Typically Permit Year 4 | 1. Yes/No |
| | | 2. Self-audit and document any stormwater program components not audited by EPA or NCDEQ utilizing the DEQ Audit Template. Submit Self-Audit to DEMLR (required component of permit renewal application package). | 2. Permit Year 5 | 2. Yes/No/Partial |
| | | 3. Certify the stormwater permit renewal application (Permit renewal application form, Self-Audit, and Draft SWMP for the next 5-year permit cycle) and submit to NCDEQ at least 180 days prior to permit expiration. | 3. Permit Year 5 | 3. Date of permit renewal application submittal |

PART 5: PUBLIC EDUCATION AND OUTREACH PROGRAM

The Town of Rutherford College will implement a Public Education and Outreach Program (developed by and programs ran by WPCOG) 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.

In reference to MS4 Permit Self Audit Report - Public Education and Outreach, Permit Citation II.B.2.a Program Requirements, II.B.2.c. Target Audiences, and II.B.2.h. Public Education and Outreach Program: The Town of Rutherford College had not defined goals & objectives for community wide issues. Stormwater impact target audiences and extend of exposure had not been recorded at public education and outreach events.

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

Table 12: Summary of Target Pollutants & Audiences

| Target Pollutants/Sources | Target Audience(s) |
|----------------------------|--|
| Litter | General Public |
| Sediment | Construction Activity |
| Gray water | Residential |
| Fats, Oils and Grease | Businesses (Restaurants) |
| Animal operations | Commercial, Bona fide Farms and/or Urban Farming |
| Underground Storage Tanks | Businesses and Residents |
| Chemicals | Industrial, Business and Residential |
| Illicit Discharges | General Public, Businesses, Municipal Employees |
| Illegal Dumping | General Public, Businesses, Municipal Employees |
| Improper Disposal of Waste | General Public, Businesses, Municipal Employees |

The WPCOG (on behalf of the Town of Rutherford College) will manage, implement and report the following public education and outreach BMPs.

| Table 13: Public Education and Outreach BMPs | | | | |
|--|---|---------------------------|------------------------------------|--------------------------------|
| Permit Ref. | 3.2: 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 document the extent of exposure of each media, event or activity, including those elements implemented locally or through a cooperative agreement. | | | |
| BMP No. | A | B | C | D |
| | Description of BMP | Measurable Goal(s) | Schedule for Implementation | Annual Reporting Metric |

Table 13: Public Education and Outreach BMPs

| | | | | |
|--|--|--|--|--|
| <p>3.</p> | <p>Stormwater Fliers</p> | | | |
| <p>Continue to utilize the WPCOG stormwater outreach program to develop new educational materials to be distributed at events, at the nearest county library (Valdese Public Library, refilled annually or as required), and/or through mailers to utility bill addresses. Five topics will be addressed over the term of the permit; general stormwater awareness, illicit discharges, illegal dumping, chemicals and proper disposal of waste.</p> | <p>1. Develop and distribute new fliers to raise general stormwater awareness.</p> | <p>1. Permit Year 1</p> | <p>1.-5. Number of flyers distributed at each event;</p> | |
| <p>2. Develop and distribute new fliers educating about illicit discharges.</p> | <p>2. Permit Year 2</p> | <p>Number of flyers left for distribution at Library; Number of flyers remaining when refilled</p> | | |
| <p>3. Develop and distribute new fliers for illegal dumping’s impacts on stormwater quality.</p> | <p>3. Permit Year 3</p> | <p>Number of fliers sent through the mail.</p> | | |
| <p>4. Develop and distribute new fliers to raise awareness on how chemicals impact stormwater. These flyers shall focus on educating how to reduce nutrient loads from residential and business landscaping.</p> | <p>4. Permit Year 4</p> | | | |
| <p>5. Develop and distribute new fliers to educate on the importance of proper waste disposal.</p> | <p>5. Permit Year 5</p> | | | |
| <p>4.</p> | <p>Public Event Outreach</p> | | | |

Table 13: Public Education and Outreach BMPs

| | | | | |
|------------------|---|---|---|---|
| | <p>Provide stormwater educational information to the citizens through outreach activities at community events. The Town will maintain its outreach booth at the annual Fall Festival to provide educational materials and to raise awareness of stormwater issues. WPCOG will staff the booth on behalf of the Town per their outreach agreement.</p> | <p>1. Staff will have continue to have a booth at the annual Fall Festival to disperse stormwater outreach materials/awareness through the use of interactive educational games and activities.</p> | <p>1. Annually Permit Years 1-5</p> | <p>1. Number of attendees at outreach booth during the annual Fall Festival.</p> |
| | <p>COVID-19 has limited outreach opportunities at public events due to their cancelation in 2020. As such, alternative ways for this type of outreach will be necessary. Alternatives, including but not limited to, booths at farmers markets or a booth inside the library (if open) can provide these opportunities while still being safe for participants.</p> | <p>2. Staff will provide alternative outreach opportunities if the Fall Festival is canceled, or as an additional outreach supplement. Such opportunities include but are not limited to: an outreach booth at the Valdese Library, and/or an outreach booth at farmers markets (burke county or sawmills farmers markets), or other events if they are still available at different times throughout the year.</p> | <p>2. Annually Permit Years 1-5</p> | <p>2. Number of attendees at alternative outreach booth Event/location of alternative outreach booth</p> |
| <p>5.</p> | <p>Youth Community Outreach</p> | | | |
| | <p>Provide educational information, activities, and educational materials to students and youth community groups through classrooms, workshops, community presentations, and/or hands-on activities related to stormwater best practices. The targeted community groups can</p> | <p>1. WPCOG will provide instruction and stormwater educational activities to youth community groups, classrooms, workshops, community presentations,</p> | <p>1. Annually Permit Years 1-5</p> | <p>1. Number of activities/events provided; Number of participants present at these events/activities.</p> |

Table 13: Public Education and Outreach BMPs

| | | | | |
|------------------|---|--|--|---|
| | <p>include: boy scouts, girl scouts, 4-H clubs, school environmental programs, community environmental groups. Many of the individuals in these groups will hit the same target audiences as student outreach but can be more easily met with due to the nature of their organizations</p> <p>COVID-19 has limited outreach opportunities at schools, teacher workshops, and other outreach opportunities due to school closures in 2020/2021. To supplement this, a PowerPoint presentation that can be shown digitally by staff and/or provided to teachers for classes will be created</p> | <p>2. Staff will create a presentation covering stormwater topics to be presented in digital classrooms and/or provided to teachers. The PowerPoint will be presented by teachers and/or staff to students in a safe method such as an online classroom.</p> | <p>2. Annually</p> <p>Permit Years 1-5</p> | <p>2. Number of presentations provided by teachers or staff</p> <p>Number of students present during the presentation</p> |
| <p>6.</p> | <p>Printed Materials</p> | | | |
| | <p>The WPCOG will design new printed materials for target audiences to aid stormwater education. The Town will continue to distribute these materials at outreach events,</p> | <p>1. Staff will create new printed materials for distribution that addresses stormwater best management practices.</p> | <p>1. See BMP 3</p> | <p>1. See BMP 3</p> |

Table 13: Public Education and Outreach BMPs

| | | | | |
|----|--|---|---------------------------------|---------------------------------------|
| | available at Town hall, and through utility bill mailers. | 2. Staff will distribute printed materials at events, school presentations, and have them on display for public acquisition in Government buildings. The flyers will also be hosted on the WPCOG stormwater web page to enable digital access to this resource. | 2. See BMP 3 | 2. See BMP 3 |
| 7. | Annual Water Quality Conference | | | |
| | Sponsor the Western Piedmont Council of Governments and Lenoir Rhyne University's Annual Water Quality Conference to provide outreach and public participation. Staff will conduct the annual regional conference for continued education to local government officials, municipal staff, educators, local businesses, and the general public. | 1. Provide one presentation about one of the six NPDES Minimum Control Measures at each annual conference. A different MCM will be presented on each year. | 1. Annually Permit Years 1-5 | 1. Number of attendees at conference. |

Table 13: Public Education and Outreach BMPs

| 8. Evaluate Pollutants Sources and Audiences | | | | |
|--|--|---|--|--|
| | <p>Reevaluate the target pollutants (litter, sediment, gray water, fats, oils, grease, animal operations, underground storage tanks, super fund sites, chemicals, illicit discharges, illegal dumping, improper disposal of waste), sources, and associated target audiences (residents, businesses, schools, construction activity, commercial, farms, industrial, development community, general public, and municipal employees) that are likely to have significant stormwater impacts and why they were selected. This evaluation is looking at target audiences that are creating pollution to allow the Town to correctly focus education efforts in those areas.</p> | <p>1. Reevaluate the presence of the following target pollutants within the Town: litter, sediment, gray water, fats, oils, grease, urban farming, underground storage tanks, super fund sites, chemicals, illicit discharges, illegal dumping and improper disposal of waste to identify where outreach can be improved to address these pollutants.</p> | <p>1. Annually Permit Years 1-5</p> | <p>1- 2. Number of target pollutant violations. Were SWMP revisions needed to address target pollutants or audiences?</p> |
| | | <p>2. Evaluate the following target audiences to determine where outreach efforts should be focused to minimize stormwater pollutants: residents, businesses, schools, commercial, farms, industrial, development community, general public, and municipal employees.</p> | <p>2. Annually Permit Years 1-5</p> | |
| 9. Evaluate Public Education and Outreach BMPs. | | | | |
| | <p>Evaluate the successful components of outreach through interest and feedback.</p> | <p>1. See BMP 18</p> | <p>1. See BMP 18</p> | <p>1. See BMP 18</p> |

Table 13: Public Education and Outreach BMPs

| Permit Ref. | 2.1.7 and 3.2.3: Web Site Measures to provide a web site designed to convey the program’s message 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 | | | |
|-------------|--|---|--|---|
| BMP No. | A | B | C | D |
| | Description of BMP | Measurable Goal(s) | Schedule for Implementation | Annual Reporting Metric |
| 10. | Website | | | |
| | Update and maintain the already established webpage designed to convey information about the stormwater program. The Town webpage will: convey the importance of stormwater quality, provide educational resource links, compliant procedures, stormwater regulations, stormwater permit information, good housekeeping information, and shall host the current SWMP, stormwater ordinance, and annual report. | 1. The Town will maintain and update the stormwater web page by verifying all links and contact information is current/active, and posting the current year educational materials. The municipal stormwater webpage will also post the current SWMP, stormwater ordinance and that permit years annual assessment. | 1. Annually, Permit Years 1-5 | 1. Was annual self-assessment uploaded to the Town of Rutherford College’s website? Yes, No; Status; Did links, contact information, or documents need to be updated? Yes, No; Status; Were new/current educational materials added to site? Yes, No; Status. |
| 11. | Education Regarding Illicit Discharges | | | |
| | Provide educational information to municipal employees, businesses, citizens, and schools about the hazards associated with illicit discharges, illegal dumping, and improper disposal of waste. | 1. Train municipal employees in illicit discharge detection and elimination. | 1. See BMP 50 | 1. See BMP 50 |
| | | 2. Distribute material (generated from BMP 3) to target audiences (municipal employees, schools, businesses, and citizens). | 2. See BMP 3 | 2. See BMP 3 |
| | | 3. Provide education during the illicit discharge enforcement process. | 3. Continuously, Permit Years 1-5 | 3. Number of citizen interactions during enforcement. |

Table 13: Public Education and Outreach BMPs

| Permit Ref. | 3.2.5: Stormwater Hotline Measures for a stormwater hotline/helpline for the purpose of public education and outreach. | | | |
|-------------|--|---|--------------------------------------|--|
| BMP No. | A Description of BMP | B Measurable Goal(s) | C Schedule for Implementation | D Annual Reporting Metric |
| 12. | Hotline | | | |
| | The Town of Rutherford College will continue to provide a hotline that functions as a way for citizens to contact the Town to report illicit discharges, stormwater/post construction issues, outreach questions and concerns, and MS4 related concerns. | 1. Identify specific staff member who will serve as the default hotline contact. | 1. Permit Year 1 | 1. Was staff member identified Yes or No. |
| | | 2. Update hotline number for stormwater complaints and information should the number change. | 2. Annually Permit Years 1-5 | 2. Did the hotline number need to be updated? Yes, No; Status. |
| | | 3. Record number and type of complaints, concerns and information related to each call. Purpose of the call, 'type'/measure the call was about, date it occurred, and municipality of the caller will be recorded. | 3. Continuously. Permit Years 1-5 | 3. Number of hotline phone calls received by type/purpose of call. |
| | | 4. Train stormwater hotline staff in general stormwater awareness, complaint call protocols and appropriate contacts for referral and typical stormwater issues. | 4. Annually, Permit Years 1-5 | 4. Did hotline staff receive training? Yes, No; Status. |
| | | 5. Publicize contact information on the Town webpages as well as the Town of Rutherford College Facebook page. | 5. Continuously, Permit Years 1-5 | 5. Number of hotline calls received overall. |

Table 13: Public Education and Outreach BMPs

| BMP No. | A | B | C | D |
|---------|--|---|-----------------------------|-------------------------|
| | Description of BMP | Measurable Goal(s) | Schedule for Implementation | Annual Reporting Metric |
| 13. | Litter Management | | | |
| | Create an educational outreach flyer that focuses on the impacts of litter on water quality, runoff quality, and how it impacts the environment as a whole. These materials will be distributed at Town Hall and handed out at public outreach events. | 1. Litter focused outreach materials will be created and distributed to government buildings and at outreach events | 1. See BMP 3 | 1. See BMP 3 |
| | Educate participants during stream cleanups on the impacts of litter to stormwater runoff and overall water quality. | 2. Stream cleanup activities will be utilized to educate participants on the impacts of litter on water bodies | 2. See BMP 19 | 2. See BMP 19 |

PART 6: PUBLIC INVOLVEMENT AND PARTICIPATION PROGRAM

In reference to MS4 Permit Self Audit Report – Public Involvement and Participation, Permit Citation II.C.2.a. Volunteer Community Involvement Program, II.C.2.b. Mechanism for Public Involvement, and II.C.2.c. Hotline/Help Line: The Town plans to grow that effort in the future. Proximity to Lake Rhodhiss provides opportunity for public interest in events. The Town of Rutherford College will establish a hotline, webpage reporting form and survey/s, along with the use of the existing WPCOG Water Resource Committee to gather public input. Stream clean-ups will be completed on an annual basis. All events, programs, and public forums will be announced through social media.

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 Rutherford College will manage, implement and report the following public involvement and participation BMPs.

Table 14: Public Involvement and Participation BMPs

| Permit Ref. | 3.3.1: Public Input Mechanisms for public involvement that provide for input on stormwater issues and the stormwater program. | | | |
|-------------|---|---|---------------------------------|---|
| BMP No. | A | B | C | D |
| | Description of BMP | Measurable Goal(s) | Schedule for Implementation | Annual Reporting Metric |
| 14. | Hotline for Public Input | | | |
| | Provide a mechanism for public input on stormwater issues and the stormwater program through utilizing the stormwater hotline (BMP 12). | 1. Stormwater hotline (BMP 12) shall include a public input component and/or record public input comments/concerns. | 1. See BMP 12 | 1. See BMP 12 |
| 15. | Web Based Email Reporting | | | |
| | Continue to provide a mechanism for public input via the Rutherford College stormwater email for reporting stormwater issues and allowing for input regarding the stormwater program. | 1. Maintain the stormwater email complaint/reporting/in put contact information on the Towns website. | 1. Continuous, Permit Years 1-5 | 1. Did the email need to be updated? Yes, No; Status |
| | | 2. Continue to use the Rutherford College stormwater email to record and track responses, inputs, issues, and concerns for metric reporting | 2. Continuous, Permit Years 1-5 | 2. Number of questions, reports, and comments submitted via the stormwater email; Purpose of each question, report, or comment. |
| 16. | Social Media Outreach – Event Promotion | | | |

Table 14: Public Involvement and Participation BMPs

| | | | | |
|------------|--|---|---|---|
| | Utilize the existing Town of Rutherford College Facebook page to promote stormwater events, projects, outreach/general stormwater awareness, and stormwater programs. This will be used as an outreach tool to provide exposure to a larger audience and encourage engagement from the general public. | 1. Utilize the existing Town of Rutherford College Facebook page to promote public involvement and participation related to stormwater programs, events, and projects. The Facebook page will also be used to post stormwater educational materials and provide general stormwater awareness. | 1. Continuously Permit Years 1-5 | 1. Total Number of posts on the Town of Rutherford College Facebook page related to the stormwater program. |
| 17. | Water Resources Committee | | | |
| | Provide a mechanism for public input and participation via regional meetings on stormwater issues and the stormwater program. Typically, this committee is hosted by the WPCOG once a quarter. This committee also encourages municipal interconnectivity regarding water quality within the region. | 1. Participate in quarterly Water Resource Committee meetings, which are open to the public, for discussion of water quality issues within the region. Topics discussed will be recorded for annual reporting. | 1. Quarterly meetings Permit Years 1-5 | 1. Number of attendees at each meeting. |
| 18. | Public Survey and Evaluation | | | |

Table 14: Public Involvement and Participation BMPs

| | | | | |
|--------------------|--|--|--|--|
| | Provide a mechanism for public input by creating a survey to engage the public and gauge public interest in stormwater issues and the stormwater program. The survey will be taking in responses/input on the program as a whole – covering each minimum measure and BMP that refers to this Survey. | 1. Create and administer an annual survey to be linked to on the Towns website once a year. The survey will be open to feedback for a total of 4 weeks. The survey will also be shared on the Towns Facebook page. Responses/results of the survey will be analyzed for reporting and evaluation. | 1. Annually Permit Years 1-5 | 1. Number of surveys completed. |
| Permit Ref. | 3.3.2: Volunteer Opportunities Measures to provide volunteer opportunities designed to promote ongoing citizen participation. | | | |
| BMP No. | A Description of BMP | B Measurable Goal(s) | C Schedule for Implementation | D Annual Reporting Metric |
| 19. | Stream Cleanup | | | |

Table 14: Public Involvement and Participation BMPs

| | | | |
|--|---|--|---|
| <p>Provide volunteer opportunities for ongoing citizen participation through stream cleanup activities.</p> <p>Due to the COVID-19 pandemic, additional safety precautions will need to be followed. Participants will need to be spaced out in at least 6ft intervals along the stream, and materials (trash bags, gloves, ‘litter grabbers’, printed materials) will not be shared. Any reused material, such as the grabbers, will need to be sanitized before and after the cleanup event. Masks will be required to participate in the event.</p> | <p>1. Hold stream cleanup efforts by engaging groups to conduct stream cleanup activities in appropriate areas. The events will be promoted by the Town.</p> <p>For the Town of Rutherford College, the stream cleanups will focus on McGalliard Creek, Lake Rhodhiss, and/or water bodies that feed into them to help improve water quality and provide personal awareness for participants.</p> | <p>1. Annually</p> <p>Permit Years 1-5</p> | <p>1. Number of stream cleanup events held;</p> <p>Number of stream cleanup participants total;</p> <p>Number of trash bags filled.</p> |
| | <p>2. Provide all materials for stream cleanup activities (i.e. gloves, trash bags, and trash pickers) hosted by Town and WPCOG.</p> | <p>2. Annually</p> <p>Permit Years 1-5</p> | <p>2. Number of stream clean up materials distributed.</p> |
| | <p>3. The Town and WPCOG will publicize the event (hosted by WPCOG) to the public to gather volunteers for stream cleanup efforts to assist in public awareness and involvement. The event will be posted on the WPCOG website, The Town website, and flyers will be distributed at Town Hall.</p> | <p>3. Annually</p> <p>Permit Years 1-5</p> | <p>3. Was the event publicized? Yes, No; Status;</p> <p>Number of participants per event.</p> |

PART 7: ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM

MS4 Inspection Report for the Town of Rutherford College – Illicit Discharge Detection and Elimination (IDDE), Permit Citation II.D.2.a. IDDE Program: The Town is regulated by the water supply watershed protection ordinance, which does not contain any specific language on the application of notice of violations. Written procedures for implementing an IDDE Program have not been completed. In response the Town will locate priority areas likely to have illicit discharges, conduct routine dry weather outfall inspections, identify illicit discharges and trace sources, eliminate the source(s) of an illicit discharge, and evaluate and assess the IDDE Program.

The Town will also, in responses to, MS4 Inspection Report for the Town of Rutherford College – Illicit Discharge Detection and Elimination (IDDE), Permit Citation II.D.2.b. Legal Authority, the Town will create, adopt, maintain and enforce a stormwater ordinance and other regulatory mechanisms that provide the legal authority to prohibit illicit connections and discharges to the MS4.

The Town maintained a map, but the major outfalls were not identified at time of audit. Since the audit was complete, the Town hired West Consulting to map all outfalls, inlets, basins, and flow direction (II.D.2.c. Storm Sewer System Map). In the future the Town will continue to update the MS4 map as new development occurs (Permit Ref: 3.4.1 BMP 19).

In the last permit cycle, the Town did not conduct dry weather screening or maintain written procedures for dry weather field activity (II.D.2.d. Dry Weather Flow Program). Within the Stormwater Management Plan a schedule is to be created to conduct dry weather screening. Data such as date screening occurred, location of inspected outfall, and photos of outfall will be recorded in GIS.

The Town of Rutherford College Stormwater Management Plan outlines the response authority, but not procedures (II.D.2.e.). Due to water supply watershed not identifying notice of violation procedures, the Town of Rutherford College issued no NOVs. Currently, there is not a way to track and document investigations (II.D.2.f. & j.). Within the new permit cycle, as stated below, the Town will be adopting an IIDE Plan to establish written procedures. A chart will be used to track and document IDDE cases. This will allow the Town to identify priority areas based on historical data.

Further, the Town will train municipal staff and the general public to identify illicit discharge and illegal dumping through the use of educational outreach materials and training opportunities. Previously, no training had been administered to employees (II.D.2.g.). Information to the public was provided in bill inserts on a regular basis (II.D.2.h.). Educational material will be available to help educate public employees, businesses, and the general public about hazards associated with illicit discharges and the improper disposal of waste.

Public complaints of any kind can be report through a webpage portal; however the line of communication was not publicized (II.D.2.i). The stormwater hotline phone number, as mentioned in the public education and outreach and illicit discharge areas of this plan.

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

Table 15: Illicit Discharge Detection and Elimination BMPs

| Permit Ref. | 3.4.1: MS4 Map Measures to develop, update and maintain a municipal storm sewer system map including stormwater conveyances, flow direction, major outfalls and waters of the United States receiving stormwater discharges. | | | |
|--------------------|---|--|--|---|
| BMP No. | A Description of BMP | B Measurable Goal(s) | C Schedule for Implementation | D Annual Reporting Metric |
| 20. | Addition of Major Outfalls and Continual Updates to MS4 Map | | | |
| | The Town will contract with West Consultants once a year to Update and maintain the existing municipal storm sewer system map showing the infrastructure and conveyances for managing stormwater runoff from the Town. | 1. Identify and add major outfalls, and number of major outfalls to the existing MS4 map | 1. Permit Year 1 | 1. Were outfalls added to the MS4 map? Yes, No; Status; Report number of major outfalls identified. |
| | West Consultants will be contracted to continue to maintain the Town of Rutherford Colleges MS4 map. Per the 2019 MS4 audit, major outfalls will be added to the existing MS4 map along with its regular maintenance. | 2. When new conveyances and/or outfalls are located or constructed, add new infrastructure to the existing map; to be updated on an annual basis. | 2. Annually Permit Years 1-5 | 2. Were revisions to the MS4 map required? Yes, No; Status. Number of outfalls identified/constructed Number of Outfalls added over the permit term |
| Permit Ref. | 3.4.2: Regulatory Mechanism Measures to provide an IDDE ordinance or other regulatory mechanism that provides legal authority to prohibit, detect, and eliminate illicit connections and discharges, illegal dumping and spills into the MS4, including enforcement procedures and actions. | | | |
| BMP No. | A Description of BMP | B Measurable Goal(s) | C Schedule for Implementation | D Annual Reporting Metric |
| 21. | Maintain Legal Authority | | | |
| | | 1. Redevelop and Update the existing Illicit Discharge and Elimination ordinance. Adoption of the updated ordinance will be done through council approval. | 1. Permit Year 1 | 1. Was the IDDE ordinance updated? Yes, No; Status; Date ordinance was adopted.. |

Table 15: Illicit Discharge Detection and Elimination BMPs

| | | | | |
|--------------------|---|--|--|---|
| | The Town will update the existing IDDE ordinance 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. This update shall include further definition of the issuance of NOVs (per the audit) and bring the IDDE ordinance up to current standard. | 2. Review the ordinance and update if revision is required. Revisions will require council re-approval. This annual review will begin follow the ordinances update in permit year 1. | 2. Annually Permit Years 2-5 | 2. Were revisions to the ordinance needed? Yes, No; Status. |
| Permit Ref. | <p>3.4.3: IDDE Plan Measures to maintain and implement a written IDDE Plan to detect and address illicit discharges, illegal dumping and any non-stormwater discharges identified as significant contributors of pollutants to the MS4. The plan shall provide standard procedures and documentation to:</p> <ul style="list-style-type: none"> a) Locate priority areas likely to have illicit discharges, b) Conduct routine dry weather outfall inspections, c) Identify illicit discharges and trace sources, d) Eliminate the source(s) of an illicit discharge, and e) Evaluate and assess the IDDE Program. | | | |
| BMP No. | A Description of BMP | B Measurable Goal(s) | C Schedule for Implementation | D Annual Reporting Metric |
| 22. | IDDE Plan | | | |

Table 15: Illicit Discharge Detection and Elimination BMPs

| | | | | |
|------------|---|---|------------------|---|
| | Update and implement the written IDDE Plan to define the procedures for detecting and addressing illicit discharges, illegal dumping and any non-stormwater discharges identified as significant contributors of pollutants to the MS4. Previously the Town of Rutherford College had IDDE standard operating procedures included in prior stormwater plans, the new written IDDE plan will build upon those and further define the IDDE standard operating procedures. | 1. Develop an updated written IDDE Plan to further define the procedures of identifying, tracking and processing illicit discharges, illegal dumping and significant contributors of pollutants to the MS4. The plan shall build on the existing IDDE program to better define the processes of IDDE enforcement and the issuance of NOV's. Submit IDDE Plan to DEQ for approval. | 1. Permit Year 1 | 1. Was IDDE plan developed? Yes, No; Status; Date draft plan is submitted to DEQ for approval. |
| | | 2. Train staff on the processes defined in the IDDE Plan and what is required by the IDDE ordinance. | 2. See BMP 50 | 2. See BMP 50 |
| | | 3. Implement/Enforce the approved IDDE Plan and IDDE Ordinance. | 3. See BMP 27 | 3. See BMP 27 |
| 23. | Location of Priority Areas | | | |
| | Establish and maintain procedures for locating priority areas likely to have illicit discharges. A high priority area is an area that has a high chance of stormwater | 1. Use MS4 map to locate outfalls near high pollution risk areas. | 1. Permit Year 1 | 1. Were priority areas located? Yes, No; Status. |

Table 15: Illicit Discharge Detection and Elimination BMPs

| | | | | |
|-----|--|---|--------------------------------------|---|
| | pollution potential: Areas with known dry weather outfall flows/violations, repeat offenders, business/commercial areas, industrial areas, and businesses with high pollution potential. | 2. Review priority areas to determine if additional areas need to be included as priority areas. The priority areas will be re-evaluated on an annual basis to add additional high priority areas should they be found or new ones develop. | 2. Annually Permit Years 1-5 | 2. Were additional priority areas determined? Yes, No; Status; Number of Priority areas added upon revision. |
| 24. | Dry Weather Outfall Inspections | | | |
| | Perform regular dry weather (no rain in previous 48 hours) outfall inspections to proactively identify illicit discharges and illicit connections. The Town will be broken into 5 sections, with at least one section (20%) being inspected each permit year. If additional outfalls are located, they will be included in further dry weather inspections/scheduling. | 1. Establish procedures to divide the Town and create a schedule for dry weather inspections for known outfalls. The procedures will be defined by the Towns IDDE plan (BMP 21). | 1. Permit Year 1 | 1. Were dry weather inspection procedures and schedule established Yes, No; Status; Date SOP and schedule established. |
| | | 2. Implement dry weather inspection procedures. Date inspections occurred, location of inspected outfall, and photos of outfall will be documented. | 2. Annually, Permit Years 2-5 | 2. Number of dry weather inspections completed; Number of potential illicit discharges (from dry weather flow) identified. |
| 25. | Illicit Discharges and Trace Sources | | | |
| | Establish procedures to track and document Illicit Discharge investigations. The procedures will be defined by the Towns IDDE plan (BMP 22). | 1. Establish procedures to track verified discharges and trace sources. | 1. See BMP 27 | 1. See BMP 27 |
| | | 2. Maintain illicit discharge tracking documentation. | 2. See BMP 27 | 2. See BMP 27 |
| 26. | IDDE Plan Enforcement and Documentation | | | |

Table 15: Illicit Discharge Detection and Elimination BMPs

| | | | | |
|--------------------|---|---|--|---|
| | Implement the IDDE Plan to detect and address illicit discharges, illegal dumping and any non-stormwater discharges identified as significant contributors of pollutants to the MS4. | 1. Screen priority areas likely to have illicit discharges (BMP 22). | 1. Annually, Permit Years 1-5 | 1. Number of illicit discharges found in priority areas. |
| | | 2. Investigate and Enforce IDDE issues. | 2. See BMP 27 | 2. See BMP 27 |
| | | 3. Evaluate and assess the IDDE plan/program – Identify where improvements can be made based on data collected. Changes must be approved by DEQ from the previously approved IDDE Plan. | 3. Annually Permit Years 1-5 | 3. Were revisions to the IDDE plan needed? Yes, No; Status. |
| Permit Ref. | 3.4.4: IDDE Tracking Measures for tracking and documenting the date(s) an illicit discharge, illicit connection or illegal dumping was observed, the results of the investigation, any follow-up of the investigation, the date the investigation was closed, the issuance of enforcement actions, and the ability to identify chronic violators. | | | |
| BMP No. | A Description of BMP | B Measurable Goal(s) | C Schedule for Implementation | D Annual Reporting Metric |
| 27. | IDDE Tracking | | | |
| | | 1. Establish a list/documentation procedure for tracking illicit discharge connections and illegal dumping violations, outlining who made the complaint, location of violation, note prior offenses, status and action taken. | 1. Permit Year 1 | 1. Was IDDE tracking list created? Yes, No; Status; Date tracking list was made. |

Table 15: Illicit Discharge Detection and Elimination BMPs

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|--|---|---|--|
| <p>Staff will create and maintain the mechanisms 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 identifying chronic violators.</p> | <p>2. Track illicit discharge/connection and illegal dumping reports/investigations utilizing the IDDE tracking documentation/list</p> <p>The list will differentiate staff discovery from citizen reporting to allow for review of the outreach program.</p> | <p>2. Continuously, following establishment in Permit Year 1.</p> <p>Permit Years 1-5</p> | <p>2. Number of verified IDDE issues.</p> |
| | <p>3. Upon investigation, enforce Illicit Discharge/connection and Illegal Dumping violations to ensure the responsible party/violator remedies verified illicit discharges.</p> | <p>3. Continuously,</p> <p>Permit Years 1-5</p> | <p>3. Number of violations/enforcement actions issued;</p> <p>Number of violations/enforcement actions resolved.</p> |
| | <p>4. Establish and maintain a list of chronic violators, as applicable. Updated on a Semi-annual basis.</p> | <p>4. Semi-Annually,</p> <p>Permit Years 1-5</p> | <p>4. Number of chronic violators identified.</p> |

Table 15: Illicit Discharge Detection and Elimination BMPs

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|--------------------|---|--|--|---|
| | | 5. Evaluate and assess the IDDE documentation – Identify where improvement can be made based on data collected, problems encountered and needs. Evaluation will be done on an annual basis to find shortcomings with the IDDE program should they be determined. | 5. Annually, Permit Years 2-5 | 5. Were revisions to the IDDE tracking documentation needed? Yes, No; Status. |
| Permit Ref. | 3.4.5: Staff IDDE Training Measures to provide training for municipal staff and contractors who, as part of their normal job responsibilities, may come into contact with or otherwise observe an illicit discharge, illicit connection or illegal dumping. Training shall include identifying and reporting illicit discharges, illicit connections and illegal dumping. Each staff training event shall be documented, including the agenda/materials, date, and number of staff participating. | | | |
| BMP No. | A Description of BMP | B Measurable Goal(s) | C Schedule for Implementation | D Annual Reporting Metric |
| 28. | Staff Training | | | |
| | Train municipal staff and contractors to identify and report illicit discharges, illicit connections, illegal dumping and spills. | 1. Identify staff members and/or contractors that are likely to observe an illicit discharge, illicit connection and illegal dumping. | 1. See BMP 11 | 1. See BMP 11 |

Table 15: Illicit Discharge Detection and Elimination BMPs

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|--------------------|--|---|------------------------------------|--------------------------------|
| | | 2. Hold IDDE training events to educate staff and contractors in identifying and reporting illicit discharges, illicit connections, illegal dumping, and spills. Trainings will have a sign in sheet to track the names of trained individuals. | 2. See BMP 50 | 2. See BMP 50 |
| 29. | IDDE Educator | | | |
| | Establish appropriate staff contacts for field inquiries regarding IDDE education, outreach, and complaints. During IDDE enforcement, an outreach approach to raise awareness of why the violation is problematic will be taken (See BMP 11). The hotline will also function as a mechanic for responding to IDDE questions from the public. | 1. Train hotline staff in IDDE awareness, complaint call protocols, and the appropriate contacts for referral. | 1. See BMP 12 | 1. See BMP 12 |
| | | 2. Utilizing the Towns social media and website, publicize contact information for IDDE reporting. | 2. See BMP 12 9 | 2. See BMP 12 |
| Permit Ref. | 3.4.6: IDDE Reporting Measures for the public and staff to report illicit discharges, illegal dumping and spills. The mechanism shall be publicized to facilitate reporting and shall be managed to provide rapid response by appropriately trained personnel. | | | |
| BMP No. | A | B | C | D |
| | Description of BMP | Measurable Goal(s) | Schedule for Implementation | Annual Reporting Metric |
| 30. | IDDE Reporting Hotline | | | |
| | Utilize the existing hotline for enabling the public and municipal employees to report illicit | 1. Utilize the hotline (BMP 12) to receive IDDE reports. | 1. See BMP 12 | 1. See BMP 12 |

Table 15: Illicit Discharge Detection and Elimination BMPs

| | | | | |
|------------|---|---|---------------|---------------|
| | discharges, illegal dumping, and spills. | 2. Train hotline staff to differentiate between illicit discharge complaints and stormwater/post-construction complaints. The staff will also be trained to keep adequate records of the calls for metrics. | 2. See BMP 12 | 2. See BMP 12 |
| | | 3. Publicize Hotline by including the phone number on educational materials. Post the hotline number on the Town website and shared via the Rutherford College Facebook account. | 3. See BMP 12 | 3. See BMP 12 |
| 31. | IDDE Email Online Reporting | | | |
| | The Town will continue to utilize the Rutherford College Stormwater reporting email for receiving IDDE reports/input. | 1. Continue to utilize the Rutherford College Stormwater email for receiving IDDE reports/input. | 1. See BMP 15 | 1. See BMP 15 |
| 32. | IDDE Reporting Efficiency | | | |
| | Staff will provide a rapid response to all complaints received. Staff will record the response dates and summary of results to improve IDDE program and the online Map. | 1. Utilize the GIS online map layer (BMP 19) to track the time of complaint, site visit, type of complaint and all enforcement/resolution measures. | 1. See BMP 20 | 1. See BMP 20 |

Table 15: Illicit Discharge Detection and Elimination BMPs

| | | | | |
|--|--|--|----------------------------------|---------------------------|
| | | 2. Evaluate response time. Work to minimize response time to reported issues and record what is causing those issues to be fixed in later iterations of the plan. Track the times elapsed between when an IDDE incident is reported, and when it is addressed. | 2. Annually, Permit Years 1-5 | 2. Average response time. |
|--|--|--|----------------------------------|---------------------------|

PART 8: CONSTRUCTION SITE RUNOFF CONTROL PROGRAM

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

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

| Permit Reference | State or Local Program Name | Legal Authority | Implementing Entity | Meets Whole or Part of Requirement |
|------------------|--------------------------------|---------------------|---------------------|------------------------------------|
| 3.5.1 - 3.5.4 | State Implemented SPCA Program | 15A NCAC Chapter 04 | NCDEQ | Part |

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

| Table 17: Construction Site Runoff Control BMPs | | | | |
|--|--|---|------------------------------------|--------------------------------|
| Permit Ref. | 3.5.6: Public Input Measures to provide and promote a means for the public to notify the appropriate authorities of observed erosion and sedimentation problems. | | | |
| BMP No. | A | B | C | D |
| | Description of BMP | Measurable Goal(s) | Schedule for Implementation | Annual Reporting Metric |
| 33. | Municipal Staff Training | | | |
| | Train municipal staff who receive calls from the public on the protocols for referral and documentation of construction site runoff control complaints. | 1. Train municipal staff on proper handling of construction site runoff control complaints. | 1. See BMP 50 | 1. See BMP 50 |

Table 17: Construction Site Runoff Control BMPs

| | | | | |
|--------------------|---|--|-----------------------------------|---|
| | This shall build upon the concepts of previous municipal staff have taken part in by focusing on reporting, identifying, and knowing how to handle construction runoff violations. | 2. Maintain a list of trained municipal staff who have reported construction run-off issues. | 2. Continuously, Permit Years 1-5 | 2. Number of construction run-off issues reported by municipal staff; Date trained staff reporting list was established. |
| 34. | Means of Public Input | | | |
| | Utilize the survey, the hotline, and the online form to give citizens methods of responding to how construction runoff is being managed. The survey will ask questions regarding: how they view construction runoff in the Town, what they think should be changed to improve upon said problems, and where they believe there should be more focus within the program. | 1. Use survey (BMP 17) to obtain feedback about public perspective about construction runoff in the Town. | 1. See BMP 18 | 1. See BMP 18 |
| | | 2. Administer the survey. The survey will be linked on the Towns website. | 2. See BMP 18 | 2. See BMP 18 |
| | | 3. Utilize reporting email (BMP 14) that will allow citizens and the development community (separately distinguished) to write concerns and report construction runoff issues. | 3. See BMP 15 | 3. See BMP 15 |
| | | 4. Publicize the ability to report concerns about construction runoff issues via the stormwater email on the Towns website and Facebook Page. | 4. See BMP 15 | 4. See BMP 15 |
| Permit Ref. | 3.5.5: Waste Management Measures to require construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impact to water quality. | | | |
| | A | B | C | D |

Table 17: Construction Site Runoff Control BMPs

| BMP No. | Description of BMP | Measurable Goal(s) | Schedule for Implementation | Annual Reporting Metric |
|---------|---|---|-------------------------------------|---|
| 35. | Waste Management | | | |
| | Require construction site operators to control waste at the construction site that may cause adverse impact to water quality. | 1. Develop an ordinance that addresses construction site waste. | 1. Permit Year 1 | 1. Ordinance developed: Yes or No, Status. |
| | | 2. Adopt developed ordinance through council approval. | 2. Permit Year 1 | 2. Ordinance adopted; Yes, No; Status. Date ordinance was adopted. |
| | | 3. Train municipal staff on identifying and reporting construction waste violations. | 3. See BMP 50 | 3. See BMP 50 |
| | | 4. Maintain adopted ordinance (if revisions are needed). | 4. Annually Permit years 2-5 | 4. Were any revisions to the waste management ordinance made? Yes, No; Status. If revisions were needed, date of revisions |
| | | 5. Enforce ordinance by using the online GIS map layer to track and document construction site waste concerns and corrective actions. | 5. See BMP 20 | 5. See BMP 20 |

PART 9: POST-CONSTRUCTION SITE RUNOFF CONTROL PROGRAM

MS4 Inspection Report for the Town of Rutherford College – Post-construction Site Runoff Control Program Implementation Status, Permit Citation: Currently, the Town does not have a mechanism in place to require deed restrictions and protective covenants. Within the ordinance established in Permit Year One enabling language granting the Town of Rutherford College the ability to require deed restrictions and protective covenants (II.F.2.e.) will be included.

An inventory of projects will be kept and proactive inspections will be administered by Staff semi-annually. A private engineer will certify each SCM annually to ensure functionality (II.F.2.g.) Upon non-compliance, enforcement action will be taken, not a common practice in years past, but now the Town will have a spreadsheet to record enforcement action to obtain compliance (II.F.2.i.).

MS4 Inspection Report for the Town of Rutherford College – Post-construction Site Runoff Control Program Implementation Status, Permit Citation: II.F.3.c. Nutrient Sensitive Waters: The Town had not designed or constructed any SCMs in the permitted area specifically to reduce nutrient loads.

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 Rutherford College and discharge into the MS4. These elements are designed to minimize water quality impacts by 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 Rutherford College implements the following State post-construction program requirements, which satisfy the NPDES Phase II MS4 post-construction site runoff control requirements as Qualifying Alternative Program(s) (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 .0620 - .0624 | WS-IV Watershed Ordinance (See map) |



The Town of Rutherford College has existing requirements including the presence of a Qualifying Alternative Program(s) in all of the Town limits. The Qualified Alternative Program is the Lake Rhodhiss water supply watershed Critical Area WS-IV and Protected Area WS-IV. To ensure compliance with the NPDES MS4 Phase II post-construction program requirements the Town of Rutherford College applies the post-construction standards throughout the Town Limits, including the area that is located within the water supply watershed. These requirements are to be adopted as local ordinance(s) per BMP 37.B.1. and implementation per BMP 37.B.3-4, and are summarized in Table 19 below.

Table 19: Summary of Existing Post-Construction Program Elements

| Permit Requirements for Plan Review and Approval | Municipal Ordinance/Code Reference(s) and/or Document Title(s) | Date Adopted |
|---|---|--------------|
| 3.6.2(a) Authority | Chapter 152 Zoning Code Watershed Protection 152.110 | 4/5/2010 |
| 3.6.3(a) & 15A NCAC 02H.0153(c) Federal, State & Local Projects | Chapter 152 Zoning Code Watershed Protection 152.111 | 4/5/2010 |
| 3.6.3(b) Plan Review | Chapter 152 Zoning Code Watershed Protection 152.155-152.122 | 4/5/2010 |
| 3.6.3(c) O&M Agreement | Chapter 152 Zoning Code Watershed Protection 152.124 | 4/5/2010 |
| 3.6.3(d) O&M Plan | Chapter 152 Zoning Code Watershed Protection 152.124 | 4/5/2010 |
| 3.6.3(e) Deed Restrictions/Covenants | Chapter 152 Zoning Code Watershed Protection 152.122 | 4/5/2010 |
| 3.6.3(f) Access Easements | Chapter 152 Zoning Code Watershed Protection 152.122 | 4/5/2010 |
| Permit Requirements for Inspections and Enforcement | Municipal Ordinance/Code Reference(s) and/or Document Title(s) | Date Adopted |
| 3.6.2(b) Documentation | Chapter 152 Zoning Code Watershed Protection 152.126 | 4/5/2010 |
| 3.6.2(c) Right of Entry | Chapter 152 Zoning Code Watershed Protection 152.115 | 4/5/2010 |
| 3.6.4(a) Pre-CO Inspections | Chapter 152 Zoning Code Watershed Protection 152.126 | 4/5/2010 |
| 3.6.4(b) Compliance with Plans | Chapter 152 Zoning Code Watershed Protection 152.126 | 4/5/2010 |
| 3.6.4(c) Annual SCM Inspections | Chapter 152 Zoning Code Watershed Protection 152.126 | 4/5/2010 |
| 3.6.4(d) Low Density Inspections | Chapter 152 Zoning Code Watershed Protection 152.126 | 4/5/2010 |
| 3.6.4(e) Qualified Professional | Chapter 152 Zoning Code Watershed Protection 152.122 | 4/5/2010 |
| Permit Requirements for Fecal Coliform Reduction | Municipal Ordinance/Code Reference(s) and/or Document Title(s) | Date Adopted |
| 3.6.6(a) Pet Waste | Burke County Animal Control Ordinance Section 6-1 | 08/2017 |
| 3.6.6(b) On-Site Domestic Wastewater Treatment | Chapter 51: Sewer Use Regulations 51.020 | 11/19/1984 |

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

| Table 20: Post Construction Site Runoff Control BMPs | | | | |
|---|---|--|------------------------------------|---|
| Permit Ref. | 4.1.3: Minimum Post-Construction Reporting Requirements | | | |
| | Measures to document activities over the course of the fiscal year (July 1 – June 30) including appropriate information to accurately describe progress, status, and results. | | | |
| BMP No. | A | B | C | D |
| | Description of BMP | Measurable Goal(s) | Schedule for Implementation | Annual Reporting Metric |
| 36. | Standard Reporting | | | |
| | Implement standardized tracking, documentation, inspections and reporting mechanisms to compile appropriate data for the annual self-assessment process. Data shall be provided for each Post-Construction/ Qualifying Alternative Program being implemented as listed in Tables 18 and 19. | 1. Track number of low density and high density plan reviews performed. | 1. 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. |
| Permit Ref. | 2.3 and 3.6: Qualifying Alternative Program(s) | | | |
| | Measures to develop, implement and enforce additional BMPs in order to comply with the QAP state program requirements. | | | |
| BMP No. | A | B | C | D |
| | Description of BMP | Measurable Goal(s) | Schedule for Implementation | Annual Reporting Metric |

Table 20: Post Construction Site Runoff Control BMPs

| | | | | | | | | | | |
|---|--|---|------------------------------------|--------------------------------|--|---------------|---------------|--|-----------------------------------|---|
| 37. | Qualifying Alternative Program | | | | | | | | | |
| The QAP requirements are applicable to the Town of Rutherford College; however the Phase II Post-construction Stormwater Ordinance is being administered to fulfill both requirements. | | | | | | | | | | |
| Permit Ref. | 3.6.2: Legal Authority Measures to maintain adequate legal authorities through ordinance or other regulatory mechanism to: (a) review designs and proposals for new development and redevelopment to determine whether adequate stormwater control measures will be installed, implemented, and maintained, (b) request information such as stormwater plans, inspection reports, monitoring results, and other information deemed necessary to evaluate compliance with the Post-Construction Stormwater Management Program, and (c) enter private property for the purpose of inspecting at reasonable times any facilities, equipment, practices, or operations related to stormwater discharges to determine whether there is compliance with the Post-Construction Stormwater Management Program. | | | | | | | | | |
| MP No. | A | B | C | D | | | | | | |
| | Description of BMP | Measurable Goal(s) | Schedule for Implementation | Annual Reporting Metric | | | | | | |
| 38. | Maintain Legal Authority | | | | | | | | | |
| The Town has adopted and will maintain in effect the the Water Supply Watershed Model Ordinance (referenced in table 19 above), which gives the Town legal authority to review designs for new development and redevelopment, to ensure adequate stormwater controls, to request information, to perform inspections on private property, and to perform other compliance activities related to this measure. The ordinance references the DEQ BMP Design Manual as the source of standards to be used in selecting, designing, evaluating, and maintaining structural and non-structural BMPs. | | | | | | | | | | |
| <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%; padding: 5px;">1. Train staff (field and office) in WSW Ordinance procedures and enforcement actions.</td> <td style="width: 17%; padding: 5px;">1. See BMP 50</td> <td style="width: 33%; padding: 5px;">1. See BMP 50</td> </tr> <tr> <td style="padding: 5px;">2. Enforcement of the WSW Ordinance to ensure compliance of new structures. Should the correct processes and order not be followed, a notice of violation will be issued to address the violation.</td> <td style="padding: 5px;">2. Continuously, Permit Years 1-5</td> <td style="padding: 5px;">2. Number of notices of violations issued; Number of Civil Citations issued; Number of still in progress of abatement at time of annual report.</td> </tr> </table> | | | | | 1. Train staff (field and office) in WSW Ordinance procedures and enforcement actions. | 1. See BMP 50 | 1. See BMP 50 | 2. Enforcement of the WSW Ordinance to ensure compliance of new structures. Should the correct processes and order not be followed, a notice of violation will be issued to address the violation. | 2. Continuously, Permit Years 1-5 | 2. Number of notices of violations issued; Number of Civil Citations issued; Number of still in progress of abatement at time of annual report. |
| 1. Train staff (field and office) in WSW Ordinance procedures and enforcement actions. | 1. See BMP 50 | 1. See BMP 50 | | | | | | | | |
| 2. Enforcement of the WSW Ordinance to ensure compliance of new structures. Should the correct processes and order not be followed, a notice of violation will be issued to address the violation. | 2. Continuously, Permit Years 1-5 | 2. Number of notices of violations issued; Number of Civil Citations issued; Number of still in progress of abatement at time of annual report. | | | | | | | | |

Table 20: Post Construction Site Runoff Control BMPs

| | | | | |
|--|--|---|---|--|
| <p>Permit Ref.</p> | <p>3.6.3: Plan Review and Approval Measures to maintain plan review and approval authority, standards and procedures to: (a) Require Federal, State, and local government projects to comply with Post-Construction Program requirements throughout the entire MS4 permitted area, unless the entity is subject to its own NPDES MS4 permit or a qualifying alternative program, (b) Conduct site plan reviews of all new development and redeveloped sites that disturb greater than or equal to one acre, and sites that disturb less than one acre that are part of a larger common plan of development or sale for compliance with 15A NCAC 02H .1017 and the qualifying alternative programs that apply within your jurisdiction, (c) Ensure that each project has an Operation and Maintenance Agreement that complies with 15A NCAC 02H .1050(12), (d) Ensure that each project has an Operation and Maintenance Plan that complies with 15A NCAC 02H .1050(13), (e) Ensure that each project has recorded deed restrictions and protective covenants, that require the project to be maintained consistent with approved plans, and (f) Ensure that each SCM and associated maintenance accesses be protected in a permanent recorded easement per 15A NCAC 02H 1050 (9) and (10).</p> | | | |
| <p>BMP No.</p> | <p>A Description of BMP</p> | <p>B Measurable Goal(s)</p> | <p>C Schedule for Implementation</p> | <p>D Annual Reporting Metric</p> |
| <p>39.</p> | <p>Plan Review and Approval</p> | | | |
| <p>Review plans for all new development and redevelopment sites that will 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).</p> <p>All required submittals (as defined by the plan review procedures) must be received by the Town before the issuance of a Certificate of Occupancy (per development). Should the procedures not be followed, a notice of violation and stop work order will be issued in accordance with the Town’s ordinance and SOP.</p> <p>The Town of Rutherford College requires the County to hold the Certificate of Occupancy on all</p> | <p>1. Review procedures and submittal documents annually to determine if items need to be added or modified.</p> | <p>1. Annually, Permit Years 1-5</p> | <p>1. Were changes to the procedures/submittal documents needed? Yes, No; Status</p> <p>If revisions were needed, date of revisions</p> | |
| <p></p> | <p>2. Review plans for all new development and redevelopment sites that will disturb greater than or equal to one acre. This is including projects less than one acre that are part of a larger common plan of development or sale. This requirement also applies to Federal, State and Local Government projects.</p> | <p>2. See BMP 36</p> | <p>2. See BMP 36</p> | |

Table 20: Post Construction Site Runoff Control BMPs

| | | | | |
|-------------------|---|---|---------------------------------------|---|
| | <p>developments that fall under stormwater regulations within the Town. The CO is not issued until all stormwater requirements (designs, submittals, and inspections) are satisfied and the Stormwater Administrator approves the issuance.</p> <p>The Town of Rutherford College utilizes West Consultants to do SCM plan review regarding the structures, but the Town shall continue to manage the submittal/documentation part of the review. The Town collects the submittal documents and issues the permit after West Consultants reviews the SCM and drainage designs. West Consultants is recommended to encourage SCMs that help reduce nutrient loading to encourage the quality of nearby water bodies.</p> | <p>3. Maintain the existing SCM Inventory sheet. Said sheet tracks all required submittals, relevant information, and all projects within the Town that have gone through (and/or are going through) the stormwater review procedure.</p> | <p>3. See BMP 36</p> | <p>3. See BMP 36</p> |
| <p>40.</p> | <p>Operation and Maintenance Agreement and Plan</p> | | | |
| | <p>The Operation and Maintenance (O&M) agreement requires owners of structural SCMs to perpetually maintain and operate the SCM according to the O&M plan submitted during the plan review process, and shall require submission of annual inspection reports written by a qualified professional.</p> | <p>1. New SCMs built within the Town shall submit an approved O&M Agreement and O&M Plan prior to CO, along with other submittal requirements. Each O&M agreement will include a requirement for annual inspections.</p> | <p>1. Continuous Permit Years 1-5</p> | <p>1. Number of permitted projects with O&M plans that received their CO.</p> |
| <p>41.</p> | <p>Recordation</p> | | | |

Table 20: Post Construction Site Runoff Control BMPs

| | | | | |
|---------------------------|--|---|---|---|
| | <p>The plan review process shall include verification that permanent legal mechanisms are in effect ensuring the project is built consistently with its approved plans. This will be verified through the submittal of an engineer’s certification and providing an as-built. These must be received and accepted to approve the issuance of that projects CO.</p> <p>A recorded deed restriction or protective covenant, along with an access easement is established through recordation. Recording both the access easement and deed restrictions are required for the issuance of a Certificate of Occupancy on high density developments.</p> | <p>1. Ensure each project has recorded deed restrictions/protective covenants in effect to ensure development activities will be maintained consistent with the approved plans (low and high density projects).</p> | <p>1. See BMP 36</p> | <p>1. See BMP 36</p> |
| | | <p>2. Ensure that each SCM and associated maintenance access areas are recorded in a permanent easement to guarantee access for inspection and maintenance of the SCM by the Town.</p> | <p>2. See BMP 36</p> | <p>2. See BMP 36</p> |
| <p>Permit Ref.</p> | <p>3.6.4: Inspections and Enforcement Measures to maintain inspection and enforcement authority, standards and procedures to: (a) Conduct post-construction inspections prior to issuing a Certificate of Occupancy or a Temporary Certificate of Occupancy. Alternatively, the project owner may provide a surety bond to guarantee compliance with the approved plan(s), (b) Ensure that the project has been constructed in accordance with the approved plan(s), (c) Ensure annual inspection of each permitted SCM to ensure compliance with the approved Operation and Maintenance Agreement, (d) Ensure inspection of low density projects at least once during the permit term, and (e) Require that inspections be conducted by a qualified professional.</p> | | | |
| <p>BMP No.</p> | <p>A Description of BMP</p> | <p>B Measurable Goal(s)</p> | <p>C Schedule for Implementation</p> | <p>D Annual Reporting Metric</p> |
| <p>42.</p> | <p>Inspection and Enforcement</p> | | | |

Table 20: Post Construction Site Runoff Control BMPs

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| <p>After project completion, but prior to issuance of a certificate of occupancy, an inspection will be completed by a qualified professional and/or a qualified representative of the Town to ensure the project has been constructed according to the plan/design. Following approval, annual inspections by a qualified professional will be completed. Low density projects will be inspected once in a permit term to monitor potential unpermitted expansion and apply enforcement if violations are found.</p> <p>Town of Rutherford College staff will be responsible for the municipal inspection of SCMs annually.</p> | <p>1. Prior to issuance of a CO, a qualified Town representative shall perform an inspection on all project SCMs to ensure compliance. If corrections are required, then follow up inspections will be performed until the SCM and project site is compliant prior to the issuance of CO.</p> | <p>1. Continuously Permit Years 1-5</p> | <p>1. Number of pre-CO inspections completed Number of repeat inspections required.</p> |
| | <p>2. Qualified municipal staff will perform inspections of all SCMs (both government and non-government) within the Town.</p> | <p>2. Annually, Permit Year 1-5</p> | <p>2. Number of SCM inspections completed; Number of failed SCM inspections.</p> |
| | <p>3. The Owner of the SCM shall have a Qualified Licensed Professional perform an SCM inspection in accordance with the O&M Agreement and DEQ SCM manuals once a year.</p> | <p>3. Annually Permit Year 1-5</p> | <p>3. Number of qualified licensed professional inspections completed with documentation received. Number of SCMs under annual inspection enforcement.</p> |
| | <p>4. Conduct inspection of 20% of low-density projects each year (See BMP 35 for inventory).</p> | <p>4. Annually Permit Years 1-5</p> | <p>4. Number of low density inspections done; Number of low density violators found; Number of low density enforcement actions issued.</p> |

Table 20: Post Construction Site Runoff Control BMPs

| BMP No. | A | B | C | D |
|------------|---|---|----------------------------------|---|
| | Description of BMP | Measurable Goal(s) | Schedule for Implementation | Annual Reporting Metric |
| 43. | Documentation – Low Density | | | |
| | Ensure tracking and records are maintained on low density projects to ensure that upon inspection, impervious overages can be determined, and corrective actions taken. Ensure informational materials are available on the Towns website to guarantee accessibility outside of office hours. Through tracking and inspections chronic violators will be identified. 20% of the low density sites will be inspected per year. | 1. Maintain low density project list to include existing sites. | 1. See BMP 36 | 1. See BMP 36 |
| | | 2. Inspect the completed low-density projects to ensure the projects have not expanded into a high density classification thus needing a SCM. | 2. See BMP 42 | 2. See BMP 42 |
| | | 3. Provide educational materials to the general public about low density developments: during the issuance of zoning permits, distributed through mailings, posted on social media, and handed out at events. | 3. Continuously Permit Years 1-5 | 3. Number of low density educational materials distributed. |

Table 20: Post Construction Site Runoff Control BMPs

| | | | | |
|---|--|-----------------------------------|--|--|
| 44. | Documentation – High Density | | | |
| Ensure tracking and records are maintained on projects to ensure that upon granting of final CO and follow-up inspection impervious overages can be determined and corrective actions taken. Ensure informational materials are available online to guarantee accessibility outside of office hours. Through tracking and inspections chronic violators will be identified. | 1. Maintain an inventory of all developments and redevelopments (public and private) with SCMs. Update inventory as projects are reviewed, approved, and constructed. | 1. See BMP 36 | 1. See BMP 36 | |
| | 2. Provide educational material to developers about high density development. At a minimum, hyperlinks will be maintained on the Towns web page directed to the Ordinance and to the BMP Design Manual. Printed materials will be distributed (but not limited to): during the issuance of zoning permits, distributed through mail, digitally posted on social media, and handed out at events. | 2. Continuously, Permit Years 1-5 | 2. Number of high density informational materials distributed. | |
| | 3. Establish links to all ordinances, manuals, policies, checklists, design standards, and/or other materials on the Towns website. | 3. Annually Permit Years 1-5 | 3. Items placed on the webpage: Yes or No, Status; Were items replaced with current versions if revisions were required? Yes, No; Status. | |

Table 20: Post Construction Site Runoff Control BMPs

| Permit Ref. | 3.6.6: Fecal Coliform Reduction Measures to control, to the maximum extent practicable, sources of fecal coliform per 15A NCAC 02H .1017(7). At a minimum, the program shall include: (a) A pet waste management component, which may be achieved by revising an existing litter ordinance, and (b) An on-site domestic wastewater treatment system component, if applicable, which may be coordinated with local county health department, to ensure proper operation and maintenance of such systems. | | | |
|-------------|---|---|--|---|
| BMP No. | A | B | C | D |
| | Description of BMP | Measurable Goal(s) | Schedule for Implementation | Annual Reporting Metric |
| 45. | Fecal Coliform Reduction | | | |
| | Protective measures have been established through the adoption of the pet waste component of the Phase II Stormwater Ordinance. Almost all the Town of Rutherford Colleges wastewater is managed via a sewer system – however there are still some septic tanks outside of the town that could potentially become a source of fecal coliform pollution. The larger concern from wastewater fecal pollution comes from unmaintained sewer lines/sewer breaks. An outreach approach will be taken to assist in reducing this pollutant and raise awareness of what impacts not repairing/maintaining sewer lines has on water quality. | 1. Develop and adopt a Pet Waste Ordinance to reduce the amount of pet waste that reaches receiving water bodies. | 1. Annually Permit Years 1-5 | 1. Was the Pet Waste Ordinance Adopted? Yes, No; Status. Date of adoption |
| | | 2. Develop and distribute educational materials on the impacts of unmaintained wastewater systems have on water quality. These flyers will be used to raise awareness of septic wastewater pollution. | 2. Continuously, Permit Years 1-5 | 2. Number of wastewater educational materials distributed. |

PART 10: POLLUTION PREVENTION AND GOOD HOUSEKEEPING PROGRAMS

This SWMP provides a comprehensive pollution prevention and good housekeeping strategy for the Town of Rutherford College 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 park 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 Cleaning Program
7. Pavement Management Program

The Town of Rutherford College will manage, implement and report the pollution prevention and good housekeeping BMPs as specified in Table 21 below for each required program. In response to the inefficiencies identified in the MS4 Inspection Report, Permit Citations II.G.2.a., the Town had maintained an inventory of municipal facilities, but had not determined which facilities were at risk to generate polluted stormwater runoff. A list of these possible polluters will be established.

An O & M program for the facilities, SCMs, catch basins and conveyance systems has not been created to date (II.G.2.b, II.G.2.e, and II.G.2.f.). After the acceptance of the SWMP and in Permit Year One, an O & M program will be established. (BMP 45). Furthermore, the municipal facilities and SCMs were being inspected annually, as required per DEQ, but did not include documentation for potential stormwater impacts (II.G.2.b. and II.G.2.h.). Incorporated in the O & M program, staff will be trained to determine appropriate operations and maintenance for facilities and SCMs. To date staff had no training in this area. The Town of Rutherford College staff did not perform street maintenance, including cleaning of catch basins and stormwater conveyances (II.G.2.e).

II.G.2.d states that "The Town of Rutherford College did not evaluate BMPs based on their pollutant removal" in reference to streets, roads, and public parking lot maintenance. Several of the BMPs below address this issue by developing, adopting, and maintaining procedures that focus on pollutant removal in these impervious areas. Permit Reference: 3.7.7, BMP's 58-61 address this prior lack of evaluation and program implementation. BMP 58 focuses on setting schedules and requirements for street/parking lot sweeping. BMPs 59 and BMP 60 focus on minimizing and collecting litter/debris, with BMP 59.B.2 working in part as a community outreach program. BMP 61 addresses procedures for cleaning the oils, fluids, and debris that can come from car accidents by utilizing the developed standard spill procedures as necessary according to II.G.2.c.

In the audit, II.G.2.e addresses the prior lack of maintenance of the Town’s storm sewer system, Permit Reference, 3.7.3, BMP’s 48-51 focus on the training, inspection, and maintenance of said system. BMP 48 develops the required O&M plan which defines procedures/schedules, BMP 49 trains maintainers on the correct procedure, BMP 50 focuses on inspection along with its documentation, and BMP 51 addresses the audit problem itself by performing the maintenance on the system with documentation.

Previously, the use of pesticides, herbicides, and fertilizers in municipal facilities was not well tracked or managed as stated in II.G.2.i. Permit Reference, 3.7.5, BMP 54 focuses to ensure all staff using pesticides, herbicides, and fertilizers are officially certified and following appropriate (minimal) usage. BMP 55 focuses on tracking contractor certification as well as the copies of permits of both municipal staff and contractors.

II.G.2.j. addresses inconstant/lacking training for municipal employees in regards to good housekeeping and pollution practices. This is addressed in: 46.B.5, 47.B.4, 49.B.1 BMP 53.B.5, 54.B.1, 56.B.2, 57.b.3, 61.b.1, and 45.b.1. Each of these BMPs focusing on each of the 7 programs required by the permit.

II.G.2.k. addresses a lack of measures regarding correct waste disposal and cleaning of municipal vehicles/equipment. BMP 56 focuses on the washing side of the problem, addressing training, protocol, requirements, and options for municipal vehicle operators. BMP 57 focuses on the other side of the issue, ensuring that vehicle maintenance facilities are correctly disposing of waste and that permitting is correctly followed to ensure MS4 compliance.

Table 21: Pollution Prevention and Good Housekeeping BMPs

| Permit Ref. | 3.7.1: Municipal Facilities Operation and Maintenance Program | | | |
|-------------|---|--------------------|-----------------------------|-------------------------|
| | Measures to manage facilities that are owned and operated by the permittee and have the potential for generating polluted stormwater runoff. The permittee shall maintain a current inventory of municipal facilities; perform facility inspections and routine maintenance; establish specific frequencies, schedules, and standard documentation; provide staff training on general stormwater awareness and implementing pollution prevention and good housekeeping practices. | | | |
| BMP No. | A | B | C | D |
| | Description of BMP | Measurable Goal(s) | Schedule for Implementation | Annual Reporting Metric |
| 46. | Municipal Facilities Operation & Maintenance (O & M) Plan | | | |

Table 21: Pollution Prevention and Good Housekeeping BMPs

| | | | |
|---|---|---|---|
| <p>An O & M Plan must be developed, implemented, and maintained for each municipal facility with the potential to generate stormwater pollution. These plans will define the expectations of the facility in regards to stormwater/MS4 regulations. Each municipal facility in which this is applicable will implement an O&M plan. The implementation of a plan entails signing a legally binding document that defines the party charged with ensuring that the facility is correctly maintained and documentation of the maintenance is adequate. The documents will also define the procedures in how the facility will be maintained to reduce the risk of stormwater pollution. The facilities requiring O&M plans will be inventoried through BMP 46. Should the facility maintain and/or store vehicles, washing procedures will be defined in the facilities O&M plan.</p> | <p>1. Inspect all municipal facilities to determine which facilities require an O&M plan to be developed. All facilities will be inspected once per permit term. Applicable facilities will be inspected annually (See BMP 47).</p> | <p>1. See BMP 47</p> | <p>1. See BMP 47</p> |
| | <p>2. Develop an O & M plan for each municipal facility with the potential to generate stormwater pollution. Each plan will define required procedures per applicable facility to inspect, maintain and evaluate the facilities risk of stormwater pollution.</p> | <p>2. Permit Year 1</p> | <p>2. Number of facility O&M plans developed.</p> |
| | <p>3. Implement the written O & M Plan (per applicable facility).</p> | <p>3. Continuously Permit Years 2-5</p> | <p>3. Number of facility O&M plans implemented.</p> |
| | <p>4. Enforce and inspect the facilities to ensure compliance with the O & M Plans.</p> | <p>4. See BMP 47</p> | <p>4. See BMP 47</p> |

Table 21: Pollution Prevention and Good Housekeeping BMPs

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|--|--|--|---|--|
| 47. | Municipal Facility and Inspections | | | |
| <p>The municipal facilities operation and maintenance plan will ensure the facilities are being managed/maintained in a way that does not negatively impact water quality. The facilities will be maintained in a scheduled and well-defined manner by performing routine inspections. If a facility is subject to SPCC requirements, then specific inspection procedures will be completed per the SPCC requirements.</p> | <p>1. Establish: standard operating procedures for municipal facility inspections, a schedule of inspections, and a standard for report documentation/tracking.</p> | <p>1. Permit Year 1</p> | <p>1. Were procedures established? Yes, No; Status; Date procedures established; Was an inspection schedule established? Date of schedule establishment.</p> | |
| <p>As an inventory of municipally owned facilities with stormwater pollution potential already exists, any new municipal facilities built during the permit cycle will be evaluated and added to the list after the facilities completion.</p> | <p>2. Verify/reevaluate the pollution potential of facilities from the existing facility inventory. This will be done during facility inspections to determine if the facility has become, or still is, a potential source of pollution. The inventory shall be split between high potential and low potential facilities.</p> | <p>2. Annually Permit Year 1-5</p> | <p>2. Number of facilities added to the pollution potential inventory</p> | |
| | <p>3. Perform annual facility inspections for high stormwater pollution potential facilities and once per permit term inspections for low potential facilities, following the inspection SOP's established in BMP No. 46.1.</p> | <p>3. Annually Permit Years 1-5</p> | <p>3. Number of facilities inspected; Number of SPCC permitted facilities inspected.</p> | |

Table 21: Pollution Prevention and Good Housekeeping BMPs

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|--------------------|--|--|--|---|
| | | 4. Document and correct issues found during inspections. If a facility is subject to SPCC requirements, then ensure the correct documentation is in place for compliance with the regulation/requirements. | 4. Annually Permit Years 1-5 | 4. Number of corrective actions taken (SPCC permitted facilities and non-SPCC facilities). |
| | | 5. Train municipal facility staff on proper stormwater awareness and good housekeeping methods. | 5. See BMP 50 | 5. See BMP 50 |
| Permit Ref. | 3.7.2: Spill Response Program Measures for facilities and operations that store and/or use materials that have the potential to contaminate stormwater runoff if spilled. The permittee shall maintain written spill response procedures and train staff on spill response procedures. | | | |
| BMP No. | A Description of BMP | B Measurable Goal(s) | C Schedule for Implementation | D Annual Reporting Metric |
| 48. | Spill Response | | | |
| | | 1. Develop a written spill response procedure plan for each facility that requires one. | 1. Permit Year 1 | 1. Were the procedures created for all facilities that require one Yes, No; Status Summary. |
| | | 2. Implement the spill response procedures plan (per facility). | 2. Continuously Permit Years 2-5 | 2. Number of spill response plans implemented. |
| | | 3. Maintain spill response procedures in response to problems that may arise from implementation of spill procedures. | 3. Annually Permit Years 1-5 | 3. Number of spill response procedure plans that required revisions. |

Table 21: Pollution Prevention and Good Housekeeping BMPs

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|--------------------|---|---|---|---|
| | Spill response program for facilities and operations that store and/or use materials that pose a spill risk. The program will be designed in a way that tracks potential polluting facilities as well as defining the procedures/materials required for spill response in those facilities. Spill response procedures and plans can be included in the facilities O&M plan. The definition of reportable spills will be written into each facility spill response plans following §143-215.85. | 4. Train facility staff on spill response procedures. 5. Respond to spills as they occur and manage the spill/s following established spill procedures. Reportable spills (per §143-215.85) will be reported to DEQ. | 4. See BMP 50 5. Continuously, Permit Years 1-5 | 4. See BMP 50 5. Number of non-reportable spills; Number of spills reported to DEQ. |
| Permit Ref. | 3.7.3: MS4 Operation and Maintenance Program Measures to minimize pollutants in the stormwater collection system. The permittee shall provide operation and maintenance staff training on stormwater awareness and pollution prevention, perform MS4 inspections, maintain the collection system including catch basins and conveyances; and establish specific frequencies, schedules, and standard documentation. | | | |
| BMP No. | A Description of BMP | B Measurable Goal(s) | C Schedule for Implementation | D Annual Reporting Metric |
| 49. | MS4 Operation & Maintenance (O & M) Plan | | | |
| | An O & M Plan must be developed, implemented and maintained to follow the requirements of the MS4 NPDES Phase II Stormwater collection system permit. As a component of this plan, a capital improvement component will be included to assist in prioritizing parts of the MS4 as determined by the MS4 inspections (BMP 50) The O&M | 1. Develop an O&M plan to define the required procedures to schedule inspections, perform maintenance and evaluations of the stormwater collection system. The plan shall cover inspection schedules, standard documentation, and staff responsibilities. | 1. Permit Year 1 | 1. Was the MS4 O&M Plan developed: Yes or No, Status. |

Table 21: Pollution Prevention and Good Housekeeping BMPs

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|-------------------|---|---|---|---|
| | <p>Plan must also be submitted to DEQ for approval.</p> <p>Malcolm Boulevard is the only street in Rutherford College that has a curb and gutter system. As such preventative maintenance is already done to clean this state owned street, it will be included in the MS4 O&M plan.</p> | <p>2. Submit the developed O&M Plan to DEQ for approval.</p> | <p>2. Permit Year 1</p> | <p>2. Was the O & M Plan approved by DEQ: Yes or No, Status;</p> <p>Date of submittal to DEQ.</p> |
| | | <p>3. Implement the written and approved O&M Plan.</p> | <p>3. Permit Years 2-5</p> | <p>3. Was the O&M Plan implemented, Yes, No; Status.</p> |
| | | <p>4. Administer the O&M Plan (See BMP 51 & 52).</p> | <p>4. Continuously, Permit Year 2-5</p> | <p>4. Number of MS4 inspections completed.</p> |
| <p>50.</p> | <p>MS4 Training</p> | | | |
| | <p>Provide MS4 training to municipal and contracted staff to minimize pollutants in the stormwater collection system, prevent unnecessary damage and wear on the system, increase awareness of stormwater issues, and show the procedures on how to deal with stormwater related issues.</p> <p>These trainings will cover: illicit discharges, pollution prevention, outreach, how to respond to IDDE or post construction issues, spill prevention and response procedures, municipal facility requirements, construction runoff, Post construction ordinance and procedures, pesticide and fertilizer management, IDDE Plan procedures and requirements, IDDE ordinance, and good housekeeping procedures.</p> | <p>1. Hold MS4 training events to educate staff on MS4 topics listed in the referencing BMPs. Train all current municipal staff on permit year one, regardless of prior training to bring them up to current standards. This will reoccur at the beginning of each new permit cycle</p> <p>The topics covered and number of participants will be recorded at each training.</p> | <p>1. Permit Year 1</p> | <p>1. Number of trainings held;</p> <p>Number of personnel trained.</p> |
| | | <p>2. Train any newly hired staff during permit years 2-5 or were not previously trained on stormwater best management practices</p> | <p>2. Permit Years 2-5</p> | <p>2. Number of trainings held;</p> <p>Number of personnel trained.</p> |
| <p>51.</p> | <p>MS4 Inspection</p> | | | |

Table 21: Pollution Prevention and Good Housekeeping BMPs

| | | | | |
|--------------------|--|--|---|---|
| | Proactively perform MS4 inspections to ensure clogged lines, non-functioning SCMs, and drainage inadequacies are identified. | 1. Inspect the MS4 infrastructure (pipes, major outfalls, stormwater conveyances, and basins) to ensure functionality. | 1. Continuously Permit Years 1-5 | 1. Number of catch basins and conveyances inspected; Number of conveyance issues found/reported; Miles of ROW's inspected |
| 52. | MS4 Maintenance | | | |
| | MS4 inspections to ensure clogged lines, non-functioning basins, and drainage inadequacies are repaired. If the municipality cannot reasonably maintain issues with MS4 infrastructure found in a permit year, it can be contracted out to a qualified licensed professional if the Town so chooses to do so. The town will utilize public works resources to maintain the MS4 infrastructure; or the issue will be included in the Towns capital improvement project list, and appropriately prioritized depending on the nature of the repair. | 1. Inspect all municipal catch basins and conveyances on an annual basis and/or upon report of maintenance being required. 2. Maintenance will be completed upon finding through inspection or receiving reports of MS4 infrastructure in poor condition. | 1. See BMP 51 2. Continuously, Permit Years 1-5 | 1. See BMP 51 2. Number of MS4 cleanings/maintenance actions performed. |
| Permit Ref. | 3.7.4: Municipal SCM Operation and Maintenance Program Measures to manage municipally-owned, operated, and/or maintained structural stormwater control measures (SCMs) that are installed for compliance with the permittee's post-construction program. The permittee shall maintain a current inventory of SCMs, perform SCM inspections and maintenance, and shall establish specific frequencies, schedules, and documentation. | | | |
| BMP No. | A | B | C | D |
| | Description of BMP | Measurable Goal(s) | Schedule for Implementation | Annual Reporting Metric |
| 53. | Municipal SCMs Operation & Maintenance (O & M) Plan | | | |

Table 21: Pollution Prevention and Good Housekeeping BMPs

| | | | | |
|-------------------|--|--|---|---|
| | <p>The maintenance procedures and inventory of the Towns municipal SCMs will be kept up to date.</p> <p>However, at the time of developing this SWMP the Town does not currently have a municipally owned SCM. Should the Town of Rutherford College need to install one following expansion, these procedures will be followed.</p> | <p>1. Maintain an inventory of existing Town-owned SCMs with information including type, year built, date of last inspection, and maintenance actions.</p> | <p>1. See BMP 36</p> | <p>1. See BMP 36</p> |
| | | <p>2. Develop and maintain SCM Operation and Maintenance Plans for each Town-owned SCM.</p> | <p>2. Continuously</p> | <p>2. Were any municipal SCM O&M's developed? Yes, No; Status.</p> |
| | | <p>3. Review/Update SCM inventory as necessitated by new Town development.</p> | <p>3. See BMP 54</p> | <p>3. See BMP 54</p> |
| <p>54.</p> | <p>Municipal SCMs</p> | | | |
| | <p>The municipal SCM/s operation and maintenance program will ensure the stormwater structures are being managed/maintained in a way that does not negatively impact water quality. The SCMs will be maintained in a scheduled and well-defined manner written in its O&M plan.</p> | <p>1. Verify the existing list of municipal SCMs is correct by visiting the sites to determine type and condition. Use aerial photography in conjunction with Town records to determine SCM location/ ownership.</p> | <p>1. Permit Year 1</p> | <p>1. Is the SCM list complete: Yes or No, Status (Location and type to be documented).</p> |
| | <p>At the time of developing this SWMP the Town of Rutherford College does not currently have a municipally owned SCM. Should the Town need to install one following expansion, these procedures will be followed.</p> | <p>2. Maintain Inventory of municipally owned SCMs. Add all new SCMs as they are constructed.</p> | <p>2. Continuously Permit Years 1-5</p> | <p>2. Did the inventory require any municipal SCMs to be added Yes, No; Status.</p> |
| | | <p>3. Perform annual inspection and maintenance of municipally owned SCMs to ensure the operation and maintenance plan is being followed.</p> | <p>3. Annually Permit Years 1-5</p> | <p>3. Number of municipal SCMs inspections done; Total number of Municipally owned SCMs</p> |

Table 21: Pollution Prevention and Good Housekeeping BMPs

| | | | | |
|--------------------|--|--|--|---|
| | | 4. Document and correct issues found during inspections. | 4. Annually Permit Years 1-5 | 4. Number of issues identified/recorded; Number of corrective actions/repairs taken. |
| | | 5. Should a municipal SCM be installed, Training on the maintenance of the SCM and its function shall be held. | 5. See BMP 50 | 5. See BMP 50 |
| Permit Ref. | 3.7.5: Pesticide, Herbicide and Fertilizer Management Program Measures to minimize water quality impacts from the use of landscape chemicals. The permittee shall provide routine pollution prevention and chemical use, storage and handling training, and shall ensure compliance with permits and applicator certifications. | | | |
| BMP No. | A Description of BMP | B Measurable Goal(s) | C Schedule for Implementation | D Annual Reporting Metric |
| 55. | Pesticide, Herbicide and Fertilizer Training to Staff | | | |
| | Measures to minimize water quality impacts from the use of landscaping chemicals. The only staff who will be allowed to apply pesticides, herbicides, or fertilizers will be certified individuals who use methods that minimize the amounts used. As staff previously took part in pesticide, herbicide, and fertilizer trainings, this shall expand to include contractors that work on behalf of the Town to ensure only safe applications are being done. | 1. Continue to provide training to municipal staff on the use, storage, and handling to get officially certified. The training will include methods of using minimal chemicals to reduce harmful effects, especially around SCM maintenance. These trainings will now include contractors that work on behalf of the Town to ensure all pesticide applications do not pose potential pollution risk. | 1. See BMP 50 | 1. See BMP 50 |

Table 21: Pollution Prevention and Good Housekeeping BMPs

| 56. | Pesticide, Herbicide and Fertilizer Compliance | | | |
|--------------------|---|---|---|-----------------------------------|
| | Ensure compliance with permits and certifications for the administering of pesticides, herbicides and fertilizer to ensure application of product is less impactful to stormwater runoff. Only certified landscapers/sprayers are the ones applying pesticides, herbicides and fertilizers. | 1. Maintaining copies of licenses / certifications of all staff and contractors who use landscape chemicals. | 1. Annually Permit Years 1-5 (FY19/20-FY23/24) | 1. Number of certified personnel. |
| Permit Ref. | 3.7.6: Vehicle and Equipment Cleaning Program Measures to prevent and minimize contamination of stormwater runoff from areas used for municipal vehicle and equipment maintenance and/or cleaning. The permittee shall ensure that municipal industrial facilities subject to NPDES industrial permitting comply with those permit requirements, provide routine pollution prevention training to staff, perform routine inspections, and establish specific frequencies, schedules, and documentation. | | | |
| BMP No. | A | B | C | D |
| | Description of BMP | Measurable Goal(s) | Schedule for Implementation | Annual Reporting Metric |
| 57. | Vehicle and Equipment Cleaning | | | |
| | Prevent or Minimize Contamination of Stormwater Runoff from all areas used for Vehicle and Equipment Cleaning. Wash water can be directed to the sanitary sewer or to vegetated areas. Where cleaning operations cannot be performed as described above and when operations are performed in the vicinity of a storm drainage collection system, the drain is to be covered with a portable drain cover during | 1. Establish Standard Operating Procedure for containing and disposing of vehicle and equipment wash water. The procedures will be defined through the facilities O&M plan. | 1. See BMP 46 | 1. See BMP 46 |
| | | 2. Provide routine vehicle pollution prevention training to staff. | 2. See BMP 50 | 2. See BMP 50 |

Table 21: Pollution Prevention and Good Housekeeping BMPs

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| | <p>cleaning activities. Any excess standing water shall be removed and properly handled prior to removing the drain cover. Or another acceptable method is installation of a SCM to capture and treat the wash water runoff.</p> <p>If a commercial car wash is used, invoices will be kept on record and recorded.</p> | <p>3. Wash all municipal light vehicles, Town emergency vehicles, and equipment using an established method listed under this BMP, or utilize a commercial carwash facility that contains and treats wash water where applicable.</p> | <p>3. Continuously Permit Years 1-5</p> | <p>3. Number of vehicle washings performed;</p> <p>Was vehicle washing completed per this BMP? Yes, No; Status;</p> |
| | | <p>4. Record washing procedures. Upon facility inspection (BMP 46) verify that documentation is being kept ensuring compliance and said documentation shows the facility is following the best management practices defined in their O&M plan.</p> | <p>4. See BMP 47</p> | <p>4. See BMP 47</p> |
| 58. | Vehicle and Equipment Maintenance | | | |
| | <p>The Town of Rutherford College does not have a facility for vehicle maintenance as municipal vehicles/equipment are taken to local vehicle shops for maintenance. However municipal staff will be trained to be aware of the pollution potential of their vehicles to minimize the potential for pollution generation.</p> | <p>1. Provide routine pollution prevention and waste management training to staff.</p> | <p>1. See BMP 50</p> | <p>1. See BMP 50</p> |
| Permit Ref. | <p>3.7.7: Pavement Management Program Measures to reduce pollutants in stormwater runoff from municipally-owned streets, roads, and parking lots within the permittee’s corporate limits. The permittee shall implement measures to control litter, leaves, debris, particulate and fluid pollutants associated with vehicles, and establish specific frequencies, schedules, and documentation.</p> | | | |
| BMP No. | A | B | C | D |
| | Description of BMP | Measurable Goal(s) | Schedule for Implementation | Annual Reporting Metric |

Table 21: Pollution Prevention and Good Housekeeping BMPs

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| 59. | Street and Parking Lot Sweeping | | | |
| | Measures to reduce pollutants in stormwater runoff from municipally owned streets, roads, and parking lots within the permittee’s corporate limits. As the Town of Rutherford College does not have a regular street cleaning service, streets will be swept/cleaned annually. To supplement this, an outreach approach and right of way conveyances/inlets with frequent issues will be prioritized. | 1. Street/curb and gutter sweeping will be done to reduce road pollutants in runoff with a focus on high priority areas prone to buildup or higher chance of conveyance damage/hindrance. | 1. Annually Permit Years 1-5 | 1. Total number of lane miles swept. |
| | | 2. Track conveyances/inlets that have frequent problems with pollution to prioritize their maintenance. | 2. Continuously Permit years 1-5 | 2. Number of high priority cleanings done. |
| | | 3. Develop and distribute educational flyers regarding street runoff pollution to help supplement street cleanings. | 3. Continuously Permit Years 1-5 | 3. Number of street pollution flyers distributed. |
| 60. | Litter Management | | | |
| | Collect litter in public areas and parking lots to reduce negative impacts on water quality. | 1. Parking lots public waste receptacles are emptied on a weekly basis. | 1. Continuously Permit Years 1-5 | 1. Number of full time employees responsible; Number of trash bags used. |
| 2. All other litter collection is performed on an as-needed basis utilizing available staff or community volunteers. | | 2. Annually Permit Years 1-5 | 2. Number of litter pick up events; Weight of trash collected/disposed of for each event (pounds); Number of staff and/or volunteers. | |
| 61. | Leaf and Yard Debris Outreach | | | |

Table 21: Pollution Prevention and Good Housekeeping BMPs

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| | <p>Implement measures to reduce the amount of leaves and debris entering storm drains within the Town.</p> <p>The Town of Rutherford College does not provide a leaf collection service, however the company contracted to collect trash on behalf of the Town will collect bagged yard waste at the owner's expense.</p> <p>To supplement this an educational approach will be taken alongside including leaf management procedures in the MS4 O&M plan (BMP 48) and each facility O&M plan (BMP 45).</p> <p>Should issues arise from this approach, further measures/revisions to the MS4 O&M plan shall be made to address said issues.</p> | <p>1. Leaves are disposed of by individual property owners. Leaves collected on town property will be bagged and properly disposed of. The procedures for their collection and disposal will be included in the facility O&M plans.</p> <p>2. Educational materials will be developed and distributed at Town Hall to educate the residents/businesses on leaf litter and yard debris impacts on stormwater quality.</p> <p>3. Review MS4 O&M Plan (BMP 48). If leaf/yard debris issues have arisen, revise plan to address shortcomings.</p> | <p>1. Continuously Permit Years 1-5</p> <p>2. Annually Permit Years 1-5</p> <p>3. See BMP 49</p> | <p>1. Number of bags of leaves collected/disposed of from municipal properties</p> <p>2. Number of leaf litter/yard waste flyers distributed.</p> <p>3. See BMP 49</p> |
| <p>62.</p> | <p>Vehicle Pollutant Management</p> <p>Measures to prevent and minimize contamination of stormwater runoff from vehicle pollutants following an accident.</p> | <p>1. Train first responders for minimizing, collecting and disposing of fluids and other vehicular pollutants following an accident.</p> | <p>1. Annually Permit Years 1-5</p> | <p>1. Number of first responders (staff) trained and date of training.</p> |

Table 21: Pollution Prevention and Good Housekeeping BMPs

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| | | 2. Continue equipping the first responder vehicles with spill kits and material containment tools. | 2. Annually Permit Years 1-5 | 2. Amount of materials used/replaced in kits. |
| | | 3. Public Education to include information about vehicle leaks in distributed materials and other educational resources. | 3. Annually Permit Years 1-5 | 3. Number of vehicle pollution educational materials handed out. |
| | | 4. Illicit Discharge enforcement for significant vehicle leaks from parked cars. | 4. Annually Permit Years 1-5 | 4. Number of vehicle IDDE issues documented; number of vehicle IDDE issues enforced/corrected. |