CONOVER North Carolina

STORMWATER MANAGEMENT PLAN

NPDES NCS000431

January 27, 2022

Prepared by:

WPCOG

Planning & Transporation

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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 City of Conover will comply with its National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permit and the applicable provisions of the Clean Water Act to meet the federal standard of reducing pollutants in stormwater runoff to the maximum extent practicable.

This SWMP identifies the specific elements and minimum measures that the City of Conover 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 NCS000431, as issued by NCDEQ. This permit covers activities associated with the discharge of stormwater from the MS4 as owned and operated by the City of Conover and located within the corporate limits of the City of Conover.

In preparing this SWMP, the City of Conover 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:

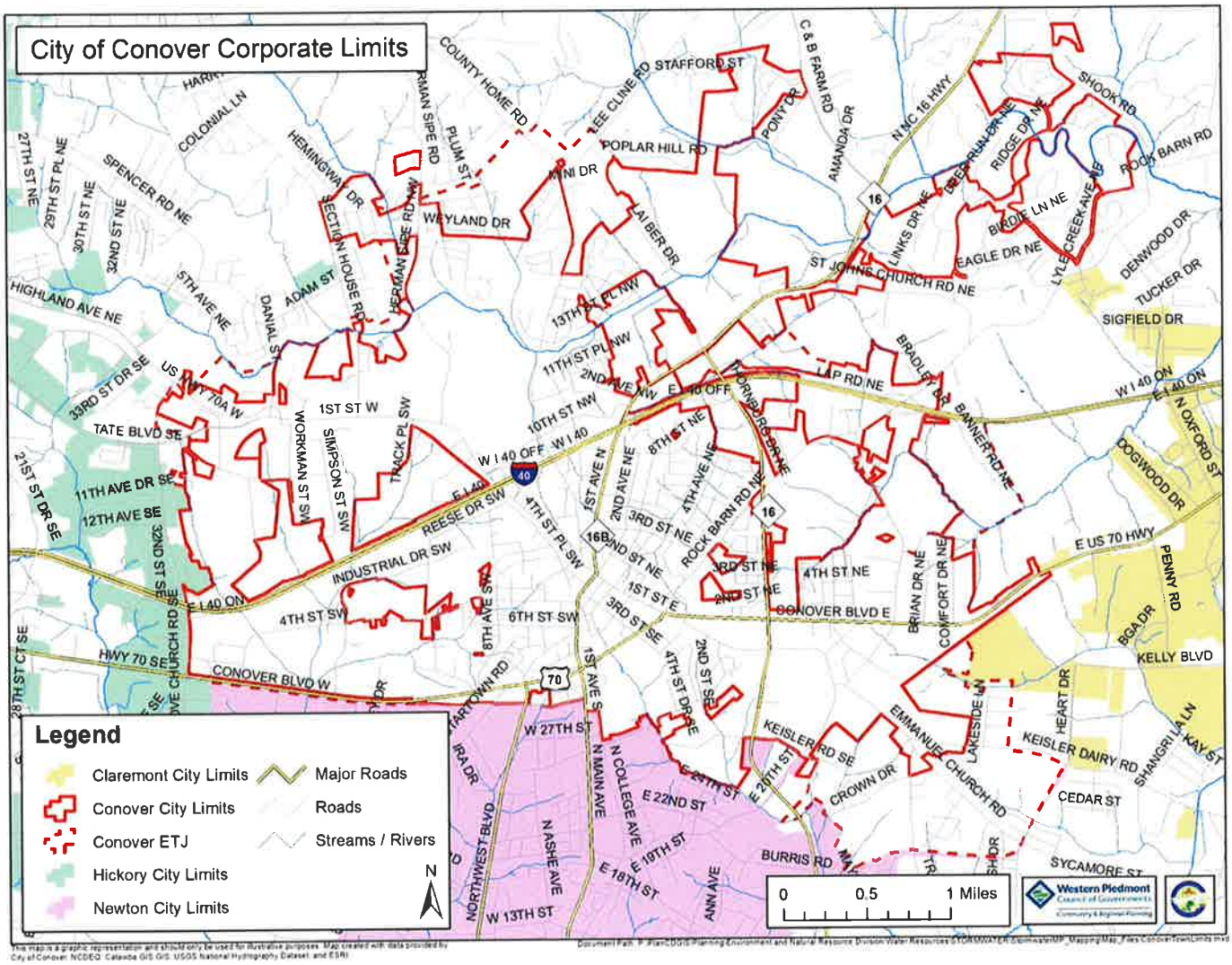
- ☐ A specific individual having overall responsibility for stormwater matters.
- ☐ A specific position having overall responsibility for stormwater matters.

Signature:	Jimmy Clark
Name:	*Jimmy Clark*
Title:	*Interim City Manager*
Signed this JAN day 27 2022.	

PART 3: MS4 INFORMATION

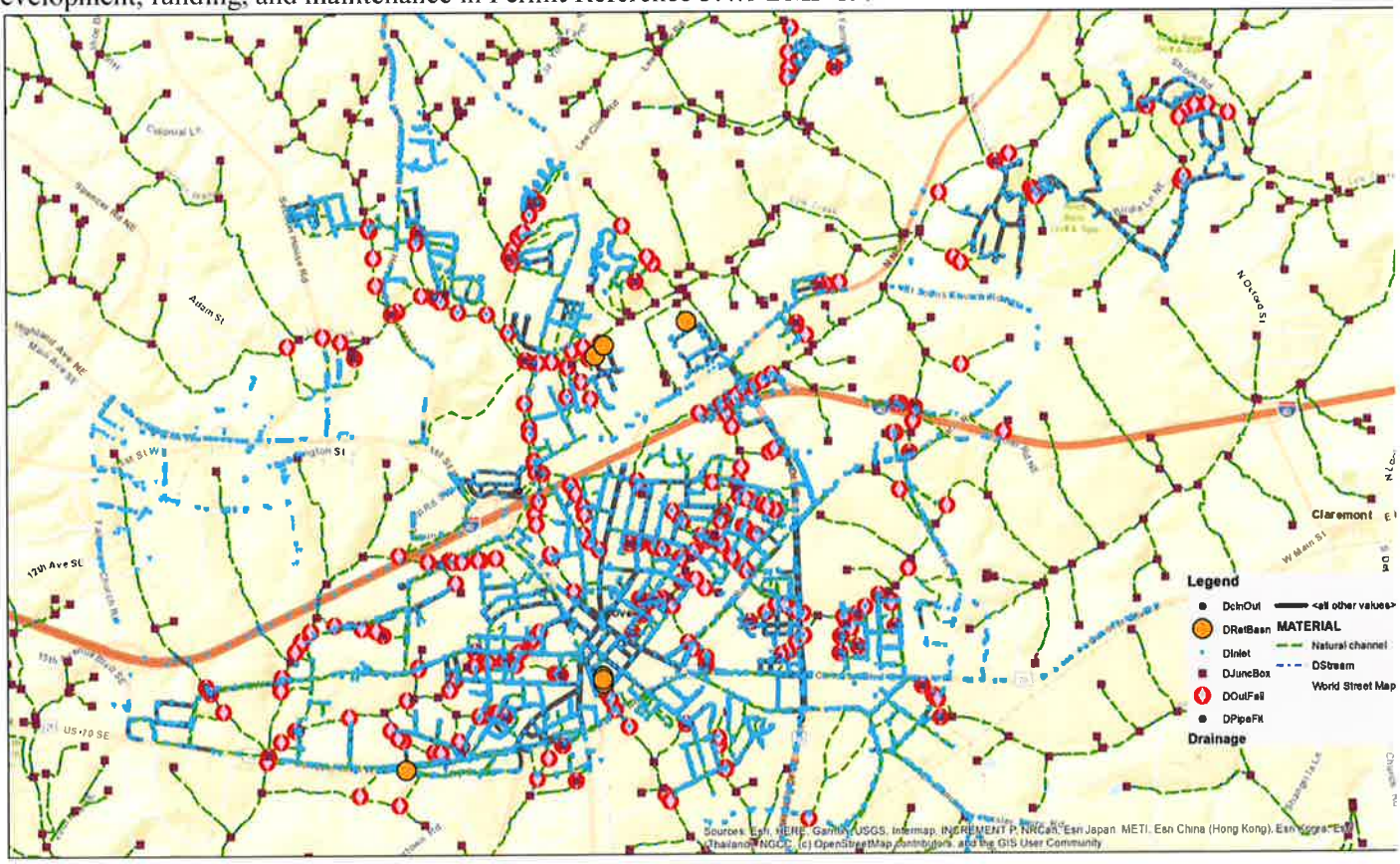
3.1 Permitted MS4 Area

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



3.2 Existing MS4 Mapping

The current MS4 mapping includes outfalls located within the City of Conover. In the future, the City will be adding the following elements to the map: stormwater conveyances, flow directions, and receiving streams. This is addressed in development, funding, and maintenance in Permit Reference 3.4.1 BMP 19.



The City of Conover has a historic count of 153 outfalls per the GIS layer created; however it is not certain that all of these are major per the definition provided below. The City will be verifying all elements, as mentioned above, in the completion of BMP 19.B.1 addresses the verification of the existing data, and BMP 19.B.3-4 addresses the updating of the existing map, as well as, adding additional infrastructure as it comes in.

Table 1: Summary of MS4 Mapping

Percent of MS4 Area Mapped	90	%
No. of Major Outfalls* Mapped	153	Total

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

3.3 Receiving Waters

The City of Conover 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
Clark Creek	13-17-4	C	N/A
Cline Creek	11-129-5-2	C	N/A
Conover Branch	11-129-5-2-1	C	N/A
Hildebran Creek	11-129-5-3	C	N/A
Long Creek	11-120-(0.5)	WS-IV	N/A
Lyle Creek	11-76-(0.5)	C	N/A
McLin Creek	11-76-5-(0.3)	C	N/A
Miller Branch	11-129-5-1	C	N/A
Mull Creek	11-76-4	WS-IV	N/A
Mahaffie Branch	11-76-2	C	N/A

3.4 MS4 Interconnection

The City of Conover MS4 is not interconnected with another regulated MS4.

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 with approved TMDL municipalities.

Table 3: Summary of Approved TMDLs

Water Body Name	TMDL Pollutant	Stormwater Waste Load Allocation (Y/N)	Water Quality Recovery Program (Y/N)
Statewide	Mercury	N	N
Clark Creek	Fecal coliform	Y	N

3.6 Endangered and Threatened Species and Critical Habitat

Significant populations of threatened or endangered species and/or critical habitat are identified within the regulated MS4 urbanized area, as determined by 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. 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: Summary of Federally Listed Species/Habitat Impacted by Surface Water Quality

Scientific Name	Common name	Species Group	Federal Listing Status
Haliaeetus leucocephalus	Bald eagle	Vertebrate	Bald and Golden Eagle Protection Act
Glyptemys muhlenbergii	Bog turtle	Vertebrate	Threatened due to similarity in appearance
Glaucomys sabrinus coloratus	Carolina northern flying squirrel	Vertebrate	Endangered
Myotis septentrionalis	Northern long-eared bat	Vertebrate	Threatened
Alasmidonta varicosa	Carolina hemlock	Vascular Plant	At risk species
Hexastylis naniflora	Dwarf-flowered heartleaf	Vascular Plant	Threatened
Helianthus schweinitzii	Schweinitz's sunflower	Vascular Plant	Endangered

3.7 Industrial Facility Discharges

The City of Conover MS4 jurisdictional area includes the following industrial facilities which hold NPDES Industrial Stormwater Permits, as determined from the NCDEQ Active NPDES Stormwater Permit List and/or Active Stormwater Permits Map.

Table 5: NPDES Stormwater Permitted Industrial Facilities

Permit Number	Facility Name
NCG030105	Prodelin Corp-Conover
NCG050072	Carpenter Co - Conover
NCG050101	Armacell LLC-Conover Plant
NCG050190	Elite Comfort Solutions
NCG050327	Pregis PolyMask
NCG030673	Hickory Springs Manufacturing -Conover Complex
NCG030680	General Dynamics Mission Systems SATCOM
NCG050402	WestRock Converting Company
NCG080976	Old Dominion Freight Line Inc - HKY

NCG080428	PJF Southeast, LLC
NCG080285	Zenith Freight Lines LLC
NCG100036	Schronce Used Parts and Cars Inc.
NCG080304	UPS Ground Freight, Inc.-Conover
NCG080911	XPO Logistics Freight, Inc. - NHN
NCG080318	Wilson Trucking Corp-Conover
NCG080428	PJF Southeast, LLC
NCG110145	Northeast WWTP
NCG130044	Republic Services of NC, LLC-GDS-Conover-MRF
NCG160003	J.T. Russell & Sons, Inc.
NCG210330	Tradewinds International Inc
NCG210147	Terra Mulch Products LLC
NCG180012	Vanguard Furniture Co Incorporated
NCG180023	Craftwork Guild Plant
NCG180073	Classic Leather Incorporated
NCG180085	Craftwork Guild Plant
NCG180114	Southern Furniture Co-Plant 1
NCG180118	Southern Furniture Co-Plant 2
NCG180227	Kroehler Furniture Mfg Co Inc
TBD	City of Conover Public Works Facility

3.8 Non-Stormwater Discharges

The water quality impacts of non-stormwater discharges have been evaluated by the City of Conover as summarized in Table 6 below. The unpermitted non-stormwater flows listed as incidental do not significantly impact water quality. The City of Conover has evaluated residential and charity car washing for possible significant water quality impacts. Street cleaning is performed with dry street sweeping process; however construction sites occasionally with clean the streets with potable water as directed by NCDOT and Erosion Control requirements.

The Division has not required that other non-stormwater flows be specifically controlled by the City of Conover.

Wash water associated with car washing that does not contain detergents/surfactants 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 City of Conover to determine whether they may significantly impact water quality. The City of Conover will address the possibility of the below mentioned water quality impacts through public education and good housekeeping, as outlined in Part 5 BMP 3-8 and Part 10 BMP 45-47, 49, 52-54, 56, 57 and 61 with focusing on good housekeeping training and 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
De-chlorinated swimming pool discharges	Incidental
Street wash water	Possible
Flows from firefighting activities	Incidental

3.9 Target Pollutants and Sources

In addition to those target pollutants identified above, the City of Conover is aware of other significant water quality issues within the permitted MS4 area. Target pollutants as listed below are contributors of the stream impairment.

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 the target pollutants. In addition, the City of Conover has observed and evaluated: schools, homeowners, businesses, industrial sites, farming, construction activities, and public employees as target audiences that are likely to have significant stormwater impacts. Within the table and list below the following target pollutants have been found to be concerns within the community.

Litter: Roadside litter is an ongoing issue for the City. 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/conveyances that lead 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. Most litter is found on the side of major roads, around school facilities, and certain businesses.

Sediment: Sediment buildup is largely attributed to mismanaged construction sites with fallen or incorrectly installed sediment fences. Erosion control fences failing or being improperly maintained. 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 the city has responded and had the issue solved, but even being down for a short time can have significant effects. Erosion control fences are required for sediment control permits during construction by the DEQ throughout the entire construction process.

Gray Water: In the past a few residents have been found with washing machines straight-piped out of their homes by using water hoses exiting 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 waterways via the storm drain system.

Fats Oils and Grease: Can become an issue when grease traps are not appropriately maintained. This has led to cases of the restaurants 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. In all cases, code enforcement has responded and the issues have been remedied.

Chemicals: Industrial sites housing totes/containers of unknown/unmarked chemicals can lead to potential soil and water contamination, and/or incorrect spill cleanup procedure. Totes/containers are to be correctly stored in a way to minimize risk to the water bodies from seepage, damage to the containers, or spills. Any reports Code enforcement has responded.

Animal Operations: 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 caries excess fertilizer which also will cause eutrophication in streams with its cascading effects.

Underground storage tanks: Storage devices installed below ground can contain gasoline, fuels such as propane, industrial chemicals/oils, and most often human waste **(fecal coliform)** 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.

Some areas of the City still have homes that utilize septic tanks. If a septic tank is leaking, it create nutrient overloads in streams fed by groundwater, or allowing pathogens to enter, increasing the risk of disease. When septic tank failure is noted, the home is required to connect to sanitary sewer where available. By properly managing and enforcing septic tanks, fecal coliform can be reduced in receiving streams within/near the City.

Illicit discharges: Typically, illicit discharges come from businesses, residents or municipal facilities who dump chemicals into storm drains either incidentally due to a lack of 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 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: Waste dumped randomly in non-permitted dumping areas, can cause 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 TVs 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. The City provides municipal residential solid waste pick-up weekly to all City residents.

Improper disposal of waste: 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. These types of problems have been noticed by municipal waste managers and can be difficult to track since the improperly disposed waste is mixed in with the standard refuse. Other examples include grease going down sinks clogging sanitary MS4 systems, chemicals from batteries leaching into the groundwater, oil from oil changes not going to the correct facility, etc.

While some of the target audiences are not as prominently found within the City, it is still important to educate because they can be likely sources of non-point pollution through uninformed management practices.

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
Fecal coliform	Sewer overflows, failing septic systems, wildlife, illicit discharge	Public Education & Outreach, Illicit Discharge
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	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 City of Conover has contracted Western Piedmont Council of Governments (WPCOG) to coordinate Stormwater Management Plan efforts, to ensure the City is facilitating Best Management Practices (BMPs) to protect water quality. While WPCOG will be the primary operator of the program the City of Conover staff will be trained to handle internal procedures and report action/s to WPCOG. 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 Administrator.

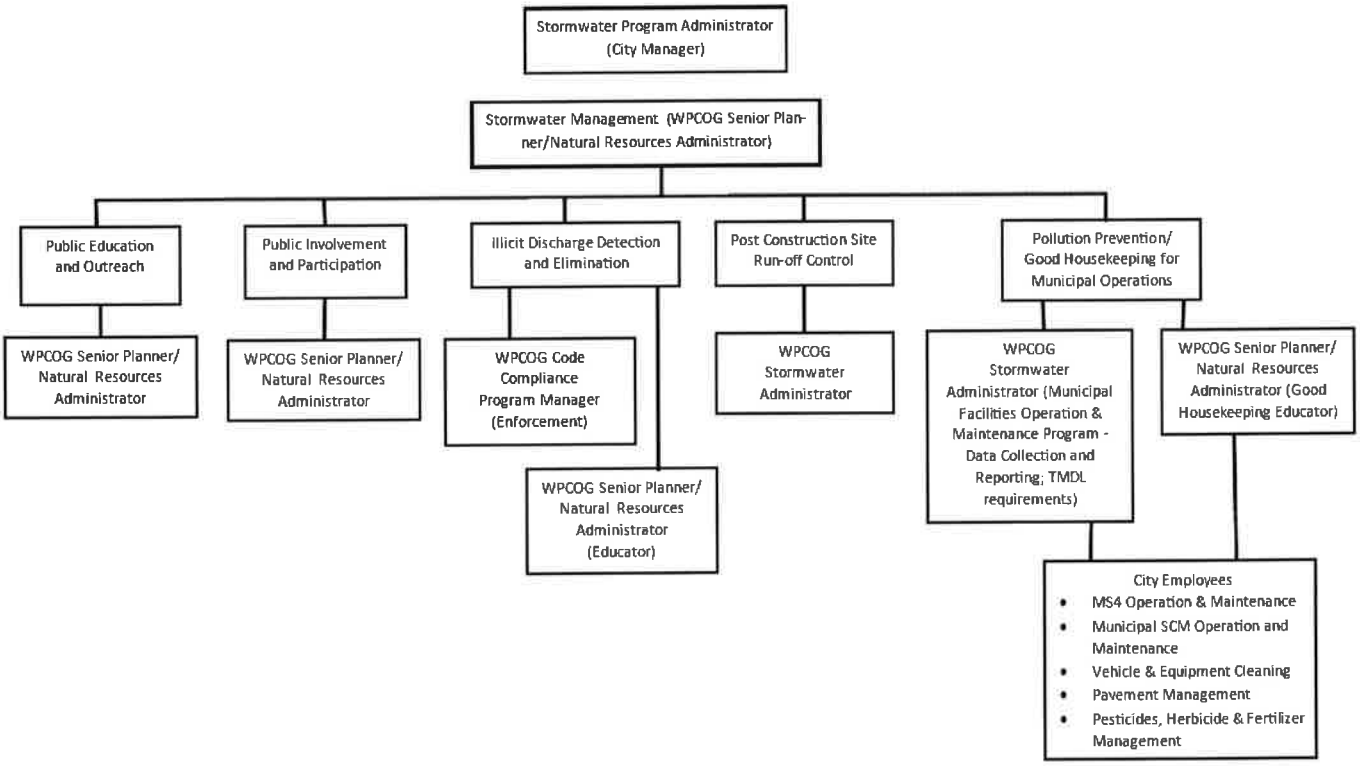


Table 8: Summary of Responsible Parties

SWMP Component	Responsible Position	Staff Name	Department
Stormwater Program Administration	Environmental Coordinator/ Construction Manager	Terry Lail	Planning, City of Conover
SWMP Management	Environmental Coordinator/ Construction Manager Senior Planner/Natural Resources Administrator	Terry Lail Johnny Wear (support contracted staff)	Planning, City of Conover Planning, WPCOG
Public Education & Outreach	Environmental Coordinator/ Construction Manager	Terry Lail	Planning, City of Conover Planning, WPCOG

	Senior Planner/Natural Resources Administrator	Johnny Wear (support contracted staff)	
Public Involvement & Participation	Environmental Coordinator/ Construction Manager Senior Planner/Natural Resources Administrator	Terry Lail Johnny Wear (support contracted staff)	Planning, City of Conover Planning, WPCOG
Illicit Discharge Detection & Elimination	Environmental Coordinator/ Construction Manager Stormwater Administrator	Terry Lail Jack Cline (support contracted staff)	Planning, City of Conover Planning, WPCOG
Construction Site Runoff Control	Environmental Coordinator/Construction Manager Erosion Control Manager	Terry Lail Varies – inspector availability	City of Conover (See 4.3 for further detail) Catawba County Erosion Control Office
Post-Construction Stormwater Management	Environmental Coordinator/ Construction Manager Stormwater Administrator	Terry Lail Jack Cline (support contracted staff)	Planning, City of Conover Planning, WPCOG
Pollution Prevention/Good Housekeeping for Municipal Operations	Environmental Coordinator/ Construction Manager Senior Planner/Natural Resources Administrator	Terry Lail Johnny Wear (support contracted staff)	Planning, City of Conover Planning, WPCOG
Municipal Facilities Operation & Maintenance Program	Environmental Coordinator/ Construction Manager Public Works General Services Director Stormwater Administrator	Terry Lail Terry Jones Jack Cline (support contracted staff)	Planning, City of Conover Public Works, City of Conover Planning, WPCOG
Spill Response Program	Environmental Coordinator/ Construction Manager Fire Department Chief Stormwater Administrator	Terry Lail Mark Hinson Jack Cline (support contracted staff)	Planning, City of Conover Fire, City of Conover Planning, WPCOG
MS4 Operation & Maintenance Program	Environmental Coordinator/ Construction Manager Public Works General Services Director	Terry Lail Terry Jones	Planning, City of Conover Public Works, City of Conover

	Stormwater Administrator	Jack Cline (support contracted staff)	Planning, WPCOG
Municipal SCM Operation & Maintenance Program	Environmental Coordinator/ Construction Manager Public Works General Services Director Stormwater Administrator	Terry Lail Terry Jones Jack Cline (support contracted staff)	Planning, City of Conover Public Works, City of Conover Planning, WPCOG
Pesticide, Herbicide & Fertilizer Management Program	Environmental Coordinator/ Construction Manager Public Works General Services Director	Terry Lail Terry Jones	Planning, City of Conover Public Works, City of Conover
Vehicle & Equipment Cleaning Program	Environmental Coordinator/ Construction Manager Public Works General Services Director	Terry Lail Terry Jones	Planning, City of Conover Public Works, City of Conover
Pavement Management Program	Environmental Coordinator/ Construction Manager Public Works General Services Director	Terry Lail Terry Jones	Planning, City of Conover Public Works, City of Conover

4.2 Program Funding and Budget

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

The City of Conover's Environmental Coordinator/Construction manager's salary one-third is covered by stormwater and two-thirds by water and waste water fees. To help cover support expenses Public Works allocated 180,000 from General Fund and Utility Monies. Leaf collection is complete by City Sanitation Staff and temporary contract workers. During the non-leaf season Grounds oversees the litter sweep, with $21,500 allocated.

The City of Conover has a two-year contract (which will need to be modified, adopted, and signed every two years) with Western Piedmont Council of Governments for the following support services: Public Education and Outreach Program, Public Involvement and Participation Program, Illicit Discharge Detection and Elimination Program, Post-Construction Site Runoff Control Program, and Pollution Prevention and Good Housekeeping Programs. The current contract amount for the 2-year period (years 1 and 2 of the NPDES permit cycle) is $53,354.00 of general funds being used. The City 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 be used to help offset cost. The City may determine that stormwater utility fees should be implemented; these fees would be collected by the City through utility bills.

Should the City of Conover choose not to renew the existing two-year contract, prior to the last month, a revision to the existing NPDES permit and Stormwater Management Plan would need to occur. The City of Conover would be required to renew the two-year contract, in years 2022 and 2024, to fully carry out the 5 year NPDES permit cycle.

4.3 Shared Responsibility

The City of Conover will be responsibility, with WPCOG (referred to as entity) providing support service, to implement the following minimum control measures, which are as stringent as the corresponding NPDES MS4 Permit requirement. The City of Conover remains responsible for compliance if the other entities fail to perform the permit obligation and both may be subject to enforcement action, if neither the City of Conover, nor the other entities fully perform 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	WPCOG Stormwater Program Planning and Administration	Y
Public Education and Outreach Program	WPCOG Stormwater Program Planning and Administration	Y
Public Involvement and Participation Program	WPCOG Stormwater Program Planning and Administration	Y
Illicit Discharge Detection and Elimination Program	WPCOG Stormwater Program Planning and Administration	Y
Construction Site Runoff Control Program	Catawba County Delegated SPCA Program	Y
Post-Construction Site Runoff Control Program	WPCOG Stormwater Program Planning and Administration	Y
Pollution Prevention and Good Housekeeping Programs	WPCOG Stormwater Program Planning and Administration	Y
Total Maximum Daily Load (TMDL)	WPCOG Stormwater Program Planning and Administration	Y

4.4 Co-Permittees

There are no other entities applying for co-permittee status under the NPDES MS4 permit number NCS000431 for the City of Conover.

4.5 Measurable Goals for Program Administration

In response to the DEQ MS4 Audit completed in 2018 for the City of Conover - Program Implementation, Documentation & Assessment (II.A2, II.A.3, II.A.4, II.A.7, III.A., III.B., IV.B.) the following changes are being implemented.
Per BMP 1 the SWMP will be reviewed on an annual basis to determine if any updates need to occur. All documents associated to the Stormwater program will be accessible online, either via the City of Conover website or the Western Piedmont Council of Governments Stormwater Partnership webpage (reference BMP 14 and 30). Documentation of all actions related to stormwater activities (as mentioned below) will be recorded, so staff can track and evaluate the effectiveness of each program component.

The City of Conover will manage 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**
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 for Permit Years 1 – 4	1. Annual Self-Assessment received by NCDEQ no later than August 31 each year.
Permit Ref.	**1.6: Permit Renewal Application** Measures to submit a permit renewal application no later than 180 days prior to the expiration date of the NPDES MS4 permit.			
BMP No.	**A**	**B**	**C**	**D**
	Description of BMP	**Measurable Goal(s)**	**Schedule for Implementation**	**Annual Reporting Metric**
2.	**Permit Renewal Application**			

Table 11: Program Administration BMPs				
	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. N/A
		2. Self-audit and document any stormwater program components not audited by EPA or NCDEQ utilizing the DEQ Audit Template.	2. Permit Year 5	2. Submit Self-Audit to DEMLR (required component of permit renewal application package).
		3. Certify and submit the stormwater permit renewal application (NOI, Self-Audit, and Draft SWMP for the next 5-year permit cycle).	3. Permit Year 5	3. Permit renewal application package received by DEQ at least 180 days prior to permit expiration.

PART 5: PUBLIC EDUCATION AND OUTREACH PROGRAM

The City of Conover will implement a Public Education and Outreach Program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of stormwater discharges into water bodies and steps the public can take to reduce pollutants in stormwater runoff.

The target audiences and identified pollutants listed in Part 3.9 of this SWMP, which will be addressed by the Public Education and Outreach Program, are summarized in Table 12 below. In addition, the City of Conover is required to inform businesses and the general public of the hazards associated with illicit discharges, illegal dumping and improper disposal of waste. The City will take a proactive approach in reporting the amount and to whom is reached through public education and outreach efforts.

Table 12: Summary of Target Pollutants & Audiences

Target Pollutants/Sources	Target Audience(s)
Litter	Residents, Businesses, Schools
Sediment	Construction Activity
Fecal Coliform	Residents, Businesses, Schools
Gray Water	Residents
Fats, Oils and Grease	Businesses (Restaurants)
Animal Operations	Bona fide farms/Urban Farming
Underground Storage Tanks	Businesses and Residents
Chemicals	Industrial, Business and Residents
Illicit Discharges	General Public, Businesses, Municipal Employees
Illegal Dumping	General Public, Businesses, Municipal Employees
Improper Disposal of Waste	General Public, Businesses, Municipal Employees

The City of Conover 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**
3.	**Stormwater Fliers**			
	Stormwater fliers will be distributed to City residences, municipal employees, businesses, and industrial facilities through stormwater events. Five topics will be addressed over the term of the permit; general stormwater	1. Develop and distribute fliers at City events to create stormwater awareness.	1. Permit Year 1	1.-5. Number of flyers distributed at each event.
		2. Develop and distribute a fliers for illicit discharges.	2. Permit Year 2	

Table 13: Public Education and Outreach BMPs				
	awareness, illicit discharges, illegal dumping, chemicals and proper disposal of waste.	3. Develop and distribute a fliers for illegal dumping.	3. Permit Year 3	
		4. Develop and distribute fliers for chemical awareness.	4. Permit Year 4	
		5. Develop and distribute fliers for proper waste disposal.	5. Permit Year 5	
4.	**Public Event Outreach**			
	Provide stormwater educational information to the general public at community events. 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 such as booths at farmers markets and/or a booth inside the library (if open) can provide these opportunities while still being safe for participants.	1. The City of Conover "Stormwater Advisory Board" hears items, as well as provides a venue for the public to ask questions related to Stormwater. The advisory board will meet at minimum once a year – but citizens can also request a meeting on an "as needed" basis. Topics discussed at advisory board meetings shall be recorded.	1. Annually Permit Years 1-5	1. Number of advisory board meetings held. Number of attendees at the advisory board meetings.
		2. Staff will have a booth at the annual "National Night Out" event, Catawba Riverfest, and/or earth/arbor day events to disperse stormwater outreach materials/awareness through the use of interactive educational games and activities. At minimum, one of the above annual events shall be attended by stormwater staff for outreach each year.	2. Annually; Permit Years 1-5	2. Number of attendees at outreach booth during the chosen event(s). Number of events attended.

Table 13: Public Education and Outreach BMPs				
		3. Staff will provide alternative outreach opportunities if the events listed in BMP 4.B.2 are canceled, or as an additional outreach supplement. Such opportunities include but are not limited to: an outreach booth at the Conover Library, and/or an outreach booth at farmers markets, or other events if they are still available.	3. Annually Permit Years 1-5	3. Number of attendees at alternative outreach booth(s)
5.	**Student/teacher outreach**			
	Provide educational information to students and teachers through classroom, workshop, and hands-on activities related to stormwater BMPs. COVID-19 has limited outreach opportunities at schools and teacher workshops due to school closures in 2020. To supplement this, a PowerPoint presentation that can be shown digitally by staff and/or provided to teachers for classes will be created	1. Staff will provide in class instruction and/or stormwater educational activities to students that attend Newton-Conover Middle School.	1. Annually Permit Years 1-5	1. Number of classes and/or activities provided; Number of students present at these classes/activities.
		2. Staff will conduct stormwater related workshops with teachers.	2. Annually Permit Years 1-5	2. Number of teacher workshops provided; Number of teachers who attended.
6.	**Printed Materials**			
	Staff will design and distribute new printed materials for target audiences to aid stormwater education. Previously the City had printed materials that focused on pet waste and general stormwater	1. Staff will create printed material for local government distribution addressing stormwater best practices.	1. Permit Year 1	1. Were new outreach materials created? Yes, No; Status.

Table 13: Public Education and Outreach BMPs				
	awareness. New printed materials will focus on additional topics not previously covered (BMP 3).	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 website 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 targeting local government officials, municipal staff, local businesses, educators, 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.
8.	**Evaluate Pollutants Sources and Audiences**			
		1. Evaluate following target pollutants: litter, sediment, gray water, fats, oils, grease, animal operations, underground storage tanks, super fund sites, chemicals, illicit discharges, illegal dumping and improper disposal of waste.	1. Annually Permit Years 1-5	1. - 2. Number of target pollutant violations; Were SWMP revisions needed to address target pollutants or audiences. Yes, No; Status

Table 13: Public Education and Outreach BMPs				
	Evaluate 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) 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 City to correctly focus education efforts in those area.	2. Evaluate the following target audiences: residents, businesses, schools, construction activity, commercial, farms, industrial, development community, general public and municipal employees.	2. Annually Permit Years 1-5	
9.	**Evaluate Public Education and Outreach BMPs.**			
	Evaluate the successful components of outreach through interest and feedback.	1. See BMP 17	1. See BMP 17	1. See BMP 17
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**			
		1. Update and maintain a stormwater web page for the existing municipal website.	1. Annually Permit Years 1-5	1. Did the website need revisions Yes, No; Status.

Table 13: Public Education and Outreach BMPs				
	Update and maintain the existing stormwater web page on the City of Conover website. The City webpage will convey the importance of water quality and a link to the WPCOG Stormwater webpage will be placed on the Cities website. The WPCOG Stormwater webpage will provide educational resource links, list the compliant procedures, stormwater regulations, stormwater permit information and good housekeeping information. Per the MS4 Audit, the existing website will be expanded to further detail outreach efforts, provide more mechanisms for reporting or providing input, the most recent SWMP, each years current annual report, and ordinance will be put on the Cities website for public availability.	2. WPCOG staff will maintain and update the WPCOG stormwater web page by: verifying all links and contact information are current/active, and posting educational materials. The municipal stormwater webpage will also have the current SWMP, stormwater ordinance, and annual assessment posted.	2. Annually Permit Years 1-5	2. Was annual self-assessment uploaded to the Cities website? Yes, no; Status; Did links, contact information, or stormwater documents need to be updated on the WPCOG website and/or the City of Conover website? Yes, No; Status; Were new/current educational materials added to the WPCOG website? Yes, No; Status.
		3. Set a hit counter in order to record engagement.	3. Annually Permit Years 1-5	3. Report the number of hits.
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 49	1. See BMP 49
		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 enforcement process.	3. Continuously, Permit Years 1-5	3. Number of citizen interactions during enforcement.
Permit Ref.	**3.2.5: Stormwater Hotline** Measures for a stormwater hotline/helpline for the purpose of public education and outreach.			
BMP No.	**A**	**B**	**C**	**D**
	Description of BMP	**Measurable Goal(s)**	**Schedule for Implementation**	**Annual Reporting Metric**
12.	**Hotline**			

Table 13: Public Education and Outreach BMPs				
	The City of Conover will continue to provide a stormwater hotline, however it will be moved to be the WPCOG stormwater hotline. The hotlines uses will be expanded to work as a way for citizens to contact the City to report illicit discharges, stormwater/post construction issues, outreach questions and concerns, and MS4 related concerns. Previously the hotline was only utilized for IDDE or stormwater violation reporting.	1. Update the specific staff member who will serve as the 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 and used for improvement on outreach and the hotline itself.	3. See BMP 12.B.5	3. See BMP 12.B.5
		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 City and WPCOG Stormwater webpages as well as the City of Conover Facebook page.	5. Continuously, Permit Years 1-5	5. Number of hotline calls received overall.

PART 6: PUBLIC INVOLVEMENT AND PARTICIPATION PROGRAM

This SWMP identifies the minimum elements and implementation of a Public Involvement and Participation Program that complies with applicable State, Tribal, and local public notice requirements. The City of Conover's Planning Board will continue to function as the City's stormwater/watershed advisory board. The WPCOG Water Resources Committee will continue to offer a forum for public comment with input and representation from the City of Conover as a way to represent their municipality/citizens in these meetings along with other municipalities. The Boards/Committee will also help provide input and guidance on stormwater issues. The City has a community volunteer program to gain citizen participation to complete stream clean-ups or litter sweeps. The City of Conover has an established hotline (main number for the City Hall), but will now be directed to WPCOG stormwater hotline, as well as, the addition of a webpage reporting form and survey/s, along with the use of the existing WPCOG Water Resource Committee to gather public input. All events, programs, and public forums will be announced through social media and/or printed handouts. The City of Conover will manage, implement, and report on the following public involvement and participation BMPs.

Table 14: Public Involvement and Participation BMPs

Permit Ref.	**3.3.1: Public Input** Mechanisms for public involvement that provide for input on stormwater issues and the stormwater program.			
BMP No.	**A**	**B**	**C**	**D**
	Description of BMP	**Measurable Goal(s)**	**Schedule for Implementation**	**Annual Reporting Metric**
13.	**Hotline for Public Input**			
	Provide a mechanism for public input on stormwater issues and the stormwater program through utilizing the stormwater hotline (BMP 12). Previously the City of Conover stormwater hotline was primarily used as a violation reporting tool. Its use will be expanded to encourage its use as a public input tool as well.	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
14.	**Web based form reporting**			
	Provide an online form for public input and stormwater reporting via the WPCOG website this will create an additional way for citizens to report issues and	1. Establish a web based email complaint/ reporting/input tool to be housed on the WPCOG website.	1. Permit Year 1	1. Form established – Yes or No; Status. Date form was established.

Table 14: Public Involvement and Participation BMPs				
	concerns, as well as have input on the stormwater program. City of Conover Public Works already has a general reporting tool in place that receives stormwater reports from the general public. Stormwater issues reported via the public works tool will be responded too and documented the same as the WPCOG online reporting form to ensure all reported issues/concerns are addressed.	2. Use the form to record and track responses, inputs, issues, and concerns for metric reporting. Purpose of each question, report, or comment will be recorded	2. Continuous, following the establishment of the form in Permit Year 1. Permit Years 2-5	2. Number of questions, reports, and comments submitted via the form
		3. Maintain the web based complaint/reporting/input form on the WPCOG website.	3. Continuous, following the establishment of Permit Year 1. Permit Years 1-5	3. Did the web form require revisions? Yes, No; Status.
15.	**Social Media Outreach – Event Promotion**			
	Utilize the existing City of Conover Facebook and Twitter pages 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 City of Conover Facebook and Twitter page to promote public involvement and participation related to stormwater programs, events, and projects. The social media pages will also be used to post stormwater educational materials and provided general stormwater awareness.	1. Continuously Permit Years 1-5	1. Total Number of posts on the City of Conover Facebook page related to the stormwater program. Total Number of posts on the City of Conover Twitter page related to the stormwater program.
16.	**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.

Table 14: Public Involvement and Participation BMPs				
		2. Hold annual Stormwater Advisory Board meetings, open to the public, for participation in discussion related to stormwater issues. The board shall meet at minimum annually, citizens can also request an advisory board meeting in addition to the annual meeting.	2. See BMP 4.1	2. See BMP 4.1
17.	**Public Survey and Evaluation**			
	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 housed on the WPCOG stormwater website once a year, open to feedback for a total of 4 weeks. The survey will also be linked on the City of Conover website and social media pages. Responses/results of the survey will be analyzed for reporting and evaluation.	1. Annually Permit Years 1-5	1. Number of surveys completed.

Table 14: Public Involvement and Participation BMPs				
Permit Ref.	**3.3.2: Volunteer Opportunities** Measures to provide volunteer opportunities designed to promote ongoing citizen participation.			
BMP No.	**A**	**B**	**C**	**D**
	Description of BMP	**Measurable Goal(s)**	**Schedule for Implementation**	**Annual Reporting Metric**
18.	**Stream Cleanup Events**			
	Provide volunteer opportunities for ongoing citizen participation through stream cleanup or litter sweep activities.	1. Hold stream cleanup efforts by engaging groups to conduct stream cleanup activities in appropriate areas. The events will be promoted by the City and WPCOG. For the City of Conover the stream cleanups will focus on Henry Fork, Jacob Fork, Clark Creek, and/or water bodies that feed into them to help improve water quality and provide personal awareness for participants.	1. Annually Permit Years 1-5	1. Number of stream cleanup events held; Number of stream cleanup participants total; Number of trash bags filled.
		2. Provide all materials for stream cleanup activities (i.e. gloves, trash bags, and trash pickers) hosted by the City and WPCOG.	2. Annually Permit Years 1-5	2. Number of stream clean up materials distributed.

Table 14: Public Involvement and Participation BMPs				
		3. The City 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 City of Conover website, and flyers will be distributed at City Hall.	3. Annually Permit Years 1-5	3. Was the event publicized? Yes, No; Status; Number of participants per event.

PART 7: ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM

Per the MS4 Inspection Report the City has written procedures for implementing an IDDE Program. To increase efforts the City 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 City has a stormwater ordinance and other regulatory mechanisms that provide the legal authority to prohibit illicit connections and discharges to the MS4, as well as the authority to apply enforcement to violators of the ordinance. The documents will be reviewed, and if necessary, updated to maintain the program and enforce IDDE issues effectively.

The City of Conover has approximately half of the MS4 mapping completed; however as development occurs the map and associated components will be updated accordingly.

In the last permit cycle the City 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 annually. Data such as date screening occurred, location of inspected outfall, and photos of outfall will be recorded in GIS.

The City of Conover in the past has investigated IDDE complaints; however there is no tracking mechanism for documenting violations and enforcement actions (II.D.2.j.). Within the new permit cycle, the use of a GIS application to track and document IDDE cases will be used. This will allow the City to identify priority areas based on historical data.

Further, the City will continue to train municipal staff and the general public to identify illicit discharges and illegal dumping through the use of educational outreach materials and training opportunities. 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 could be submitted to the City through point contact on the webpage. A webpage portal will be established on the WPCOG website, as well as, linked to on the City website. The portal will be publicized, as well as, the stormwater hotline phone number, as mentioned in the public education and outreach and public involvement sections of this plan. A citizen can make a complaint via hotline number or through an email tool on the WPCOG webpage.

The City of Conover 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. The existing Illicit Discharge Detection and Elimination Program will be expanded in order to implement a complete program by permit year 5.

Table 15: Illicit Discharge Detection and Elimination BMPs

Permit Ref.	**3.4.1: MS4 Map** Measures to develop, update and maintain a municipal storm sewer system map including stormwater conveyances, flow direction, major outfalls and waters of the United States receiving stormwater discharges.			
BMP No.	**A**	**B**	**C**	**D**
	Description of BMP	**Measurable Goal(s)**	**Schedule for Implementation**	**Annual Reporting Metric**
19.	**Continual Updates to MS4 map**			

Table 15: Illicit Discharge Detection and Elimination BMPs				
	Major outfalls will be identified and numbered, flow direction and receiving waters will be added. The existing MS4 map has outfalls throughout the City already marked, however they will be numbered and major outfalls will be separated/marked. The majority of the permitted MS4 area has been mapped, however some neighborhoods and industrial outfalls have not yet been mapped. These specific areas will be defined and added into the MS4 map to ensure full coverage of the City. Map at least 20% of unmapped areas each year until all areas have been mapped within the permit term	1. Add a layer identifying/separating major outfalls from all outfalls. Number all outfalls to provide them with a form of identification.	1. Permit Years 1-5	1. Report number of major outfalls identified; Date layer was finalized.
		2. Add unmapped areas within the MS4 and add/map the stormwater features in said areas to ensure full coverage.	2. Permit Years 1-5	2. Number of Major outfalls in newly mapped area; Were the map area shortcomings mapped? Yes, No; Status; Date additional areas were mapped.
		3. Add flow directions to the map as other components are being mapped/created.	3. Permit Years 1-5	3. Report when flow directions are added.
		4. Add new infrastructure to the MS4 map as new construction occurs, updated on an annual basis.	4. Annually Permit Years 1-5	4. Was new infrastructure added to the map: Yes, No; Status.
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**
20.	**Maintain Legal Authority**			
		1. Update the existing IDDE ordinance to follow the current NCDEQ model ordinance.	1. Permit Year 1	1. Was ordinance updated? Yes, No; Status; Date ordinance was updated to the current model ordinance.

Table 15: Illicit Discharge Detection and Elimination BMPs				
	Review existing Ordinance (Article VII. – Illicit Discharges of City of Conover Code of Ordinances) in order to maintain the legal authority to prohibit, detect, and eliminate illicit connections and discharges, illegal dumping and spills into the MS4, including enforcement procedures and actions. Update ordinance if required.	2. Review the ordinance and update if revision is required. Revisions will require council reapproval.	2. Annually Permit Years 1-5	2. Were revisions to the ordinance needed? Yes, No; Status.
Permit Ref.	**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: 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**
21.	**IDDE Plan**			
	Establish, 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. Previously the City of Conover had IDDE standard operating procedures, this IDDE plan will build upon those and better define the procedures for previously lacking elements such as but not limited to: IDDE investigations,	1. Develop written IDDE Plan to define the procedures of identifying, tracking and processing illicit discharges, illegal dumping and significant contributors of pollutants to the MS4. 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 49	2. See BMP 49

Table 15: Illicit Discharge Detection and Elimination BMPs				
	facility inspections, and dry weather screening. The IDDE plan will have a focus on documentation of IDDE investigations and procedures for how the City shall handle IDDE cases/issues including the response the city shall take in response to IDDE reports.	3. Implement/Enforce the IDDE Plan and IDDE Ordinance.	3. See BMP 26	3. See BMP 26
22.	**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 pollution potential: Areas with known dry weather outfall flows/violations, repeat offenders, business/commercial areas, industrial areas, and businesses with high pollution potential.	1. Use MS4 map to locate outfalls near high pollution risk areas. The priority areas will be re-evaluated on an annual basis.	1. Annually, Permit Years 1-5	1. Were priority areas located? Yes, No; Status.
		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.	2. Annually, Permit Years 1-5	2. Were additional priority areas determined? Yes, No; Status; Number of Priority areas added upon revision.
23.	**Dry Weather Outfall Inspections**			
	Perform regular dry weather (no rain in previous 72 hours) outfall inspections to proactively identify illicit discharges and illicit connections. The City will be broken into 5 sections, with at least one section (20%) being inspected each permit year. If additional outfalls are located,	1. Establish a procedure to divide the City and create a schedule for dry weather inspections for known outfalls. The procedures will be defined by the City 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.

Table 15: Illicit Discharge Detection and Elimination BMPs				
	they will be included in further dry weather inspections/scheduling.	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.
24.	**Illicit Discharges and Trace Sources**			
	Establish procedures to track and document Illicit Discharge investigations. The procedures will be defined by the municipal IDDE plan (BMP 22).	1. Establish procedures to track verified discharges and trace sources.	1. See BMP 26	1. See BMP 26
		2. Maintain illicit discharge tracking documentation.	2. See BMP 26	2. See BMP 26
25.	**Maintain and Implement IDDE Plan**			
	Maintain and 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. Inspect priority areas likely to have illicit discharges on a semi-annual basis and reported incidents received (BMP 22).	1. Continuously, Permit Years 1-5	1. Number of illicit discharges found in priority areas.
		2. Investigate and enforce reported/identified IDDE issues. SOP's for follow up inspections and date of IDDE case closures will be included in the IDDE plan.	2. See BMP 26	2. See BMP 26

Table 15: Illicit Discharge Detection and Elimination BMPs				
		3. Evaluate and assess the IDDE plan/program – Identify where improvements can be made based on data collected. Major 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**	**B**	**C**	**D**
	Description of BMP	**Measurable Goal(s)**	**Schedule for Implementation**	**Annual Reporting Metric**
26.	**IDDE Tracking**			
	Staff will update 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.	1. Develop and Utilize an online GIS map layer for tracking IDDE violations, recording who made the complaint, location of complaint, note prior IDDE violations, status of the investigation and actions taken.	1. Permit Year 1	1. Was the IDDE map layer created? Yes, No; Status; Date IDDE map developed.
		2. Track illicit discharge/connection and illegal dumping reports/investigations utilizing the IDDE layer on top of the MS4 map. Differentiate staff discovery from citizen reporting to allow for review of outreach program.	2. Continuously, Permit Years 1-5	2. Number of verified IDDE issues.

Table 15: Illicit Discharge Detection and Elimination BMPs				
		3. Upon investigation, enforce Illicit Discharge/connection and Illegal Dumping violations to ensure the responsible party/violator remedies verified illicit discharges.	3. Continuously, Permit Years 1-5	3. Number of violations/enforcement actions issued; Number of violations/enforcement actions resolved.
		4. Establish and maintain a list of chronic violators, as applicable. Updated on a Semi-annual basis.	4. Semi-Annually, Permit Years 1-5	4. Number of chronic violators identified.
		5. Evaluate and assess the IDDE tracking map layer – Identify where improvement can be made based on data collected, problems encountered and needs. Evaluation of the map 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 map 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**
27.	**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				
		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 49	2. See BMP 49
28.	**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 contacts in IDDE awareness, complaint call protocols, and appropriate contacts for referral.	1. See BMP 12	1. See BMP 12
		2. Utilizing social media and the City/ WPCOG webpages, publicize contact information for IDDE reporting.	2. See BMP 12	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**
29.	**IDDE Reporting Hotline**			
	Utilize the existing hotline to now enable the public and municipal employees to report illicit discharges, illegal dumping, and spills.	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				
		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 City and WPCOG websites and shared via social media accounts.	3. See BMP 12	3. See BMP 12
30.	**IDDE Reporting Web-based Reporting Form**			
	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. Use web based reporting form for IDDE reporting.	1. See BMP 14	1. See BMP 14
31.	**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 application.	1. Use the online GIS map, once established (BMP 19), to track time of complaint, site visit, type of complaint and all enforcement/resolution measures.	1. See BMP 19	1. See BMP 19

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 City of Conover relies upon the North Carolina Sedimentation Pollution Control Act (SPCA) of 1973 and the NCG010000 permit for construction activities as qualifying alternative programs to meet the NPDES MS4 Permit requirements for all construction site runoff control measures to reduce pollutants in stormwater runoff from construction activities that result in land disturbance of greater than or equal to one acre and any construction activity that is part of a larger common plan of development that would disturb one acre or more.

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	Catawba County Delegated SPCA Program*	15A NCAC Chapter 04, Inter-local Agreement for Enforcement Services of Catawba County Soil Erosion and Sediment Control Ordinance	Catawba County	Whole

*The local delegated SPCA Program ordinance(s)/regulatory mechanism(s) can be found at: https://library.municode.com/nc/catawba_county/codes/code_of_ordinances?nodeId=COOR_CH31SOERSECO

In addition to the delegated SPCA Program, opportunities for public input through the stormwater hotline, web-page reporting tool and additional waste management requirements for construction site operators provide a comprehensive construction site run off control program. The City of Conover will also implement 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**
32.	**Municipal Staff Training**			

Table 17: Construction Site Runoff Control BMPs				
	Train municipal staff who receive calls from the public on the protocols for referral and tracking of construction site runoff control complaints.	1. Train municipal staff on proper handling of construction site runoff control complaints.	1. See BMP 49	1. See BMP 49
33.	**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 City, 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 City.	1. See BMP 17	1. See BMP 17
		2. Administer the survey to allow for input on construction runoff in the City. The survey will be linked to on the WPCOG stormwater webpage and the City of Conover website.	2. See BMP 17	2. See BMP 17
		3. Utilize reporting form (BMP 14) that will allow the public to write concerns and report construction runoff issues.	3. See BMP 14	3. See BMP 14
		4. Publicize the ability to report concerns about construction runoff issues via the online form on the City and WPCOG websites and social media.	4. See BMP 14	4. See BMP 14

Table 17: Construction Site Runoff Control BMPs				
Permit Ref.	**3.5.5: Waste Management** Measures to require construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impact to water quality.			
BMP No.	**A**	**B**	**C**	**D**
	Description of BMP	**Measurable Goal(s)**	**Schedule for Implementation**	**Annual Reporting Metric**
34.	**Establish and Maintain Legal Authority of Construction Waste**			
	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.
		3. Train municipal staff on identifying and reporting construction waste violations.	3. See BMP 49	3. See BMP 49
		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.
		5. Enforce ordinance using the online GIS map to track and document construction site waste concerns and corrective actions.	5. See BMP 19	5. See BMP 19.

PART 9: POST-CONSTRUCTION SITE RUNOFF CONTROL PROGRAM

The City of Conover SWMP 2013 has policy language for deed restrictions and protective covenants. In the new SWMP permit cycle the language will also be included in the Stormwater Ordinance. An amendment to the ordinance will allow the language to have legal significance.

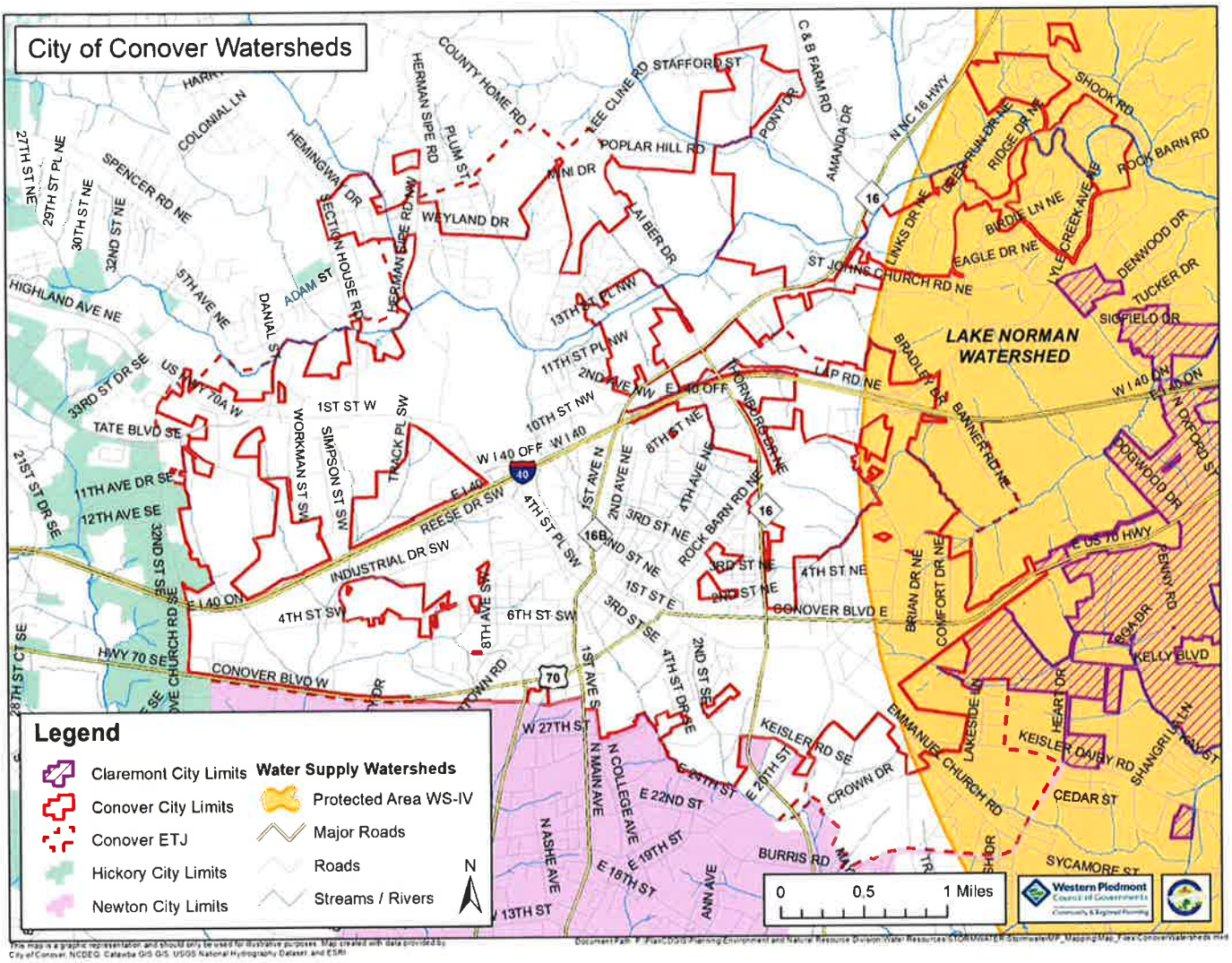
Contracting WPCOG, an inventory of projects will be established (BMP 35.B.1, 2, and 3) for developments within the municipal limits, this is in response to Permit Citation II.F.2.d, of the latest DEQ MS4 audit (2018). Along with the inventory list, proactive inspections will be administered by Staff semi-annually and the owner of the privately owned SCM will be required to have an inspection done by a certified private engineer annually to ensure SCM functionality (Permit Citation II.F.2.g.). Upon non-compliance, enforcement action will be taken. The City will have a GIS tracking mechanism to proactively enforce to obtain compliance (II.F.2.i.).

This SWMP identifies the minimum elements to develop, implement and enforce a program to address stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that are located within the City of Conover and discharge into the MS4. These elements are designed to minimize water quality impacts utilizing a combination of structural Stormwater Control Measures (SCMs) and/or non-structural BMPs appropriate for the community, and ensure adequate long-term operation and maintenance of SCMs.

In accordance with 15A NCAC 02H .0153 and .1017, the City of Conover 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) Protected Areas



The City of Conover has a small portion on the east side of the City limits located within a water supply watershed. The area within the watershed boundaries are required to follow those rules to ensure drinking water quality is being maintained. This is known as a Qualifying Alternative Program (QAP). The City is also subject to the NPDES Phase II MS4 post-construction program requirements. These existing requirements will be codified in local ordinance(s) per BMP 37.B.1 and implementation per BMP 37.B.3-4.

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	Appendix C - Stormwater Ordinance (Phase II) Section 10.2	May 7, 2007
3.6.3(a) & 15A NCAC 02H.0153(c) Federal, State & Local Projects	Appendix C - Stormwater Ordinance (Phase II) Article II	May 7, 2007
3.6.3(b) Plan Review	Appendix C - Stormwater Ordinance (Phase II) 30.2	May 7, 2007
3.6.3(c) O&M Agreement	Appendix C - Stormwater Ordinance (Phase II) 50.2	May 7, 2007
3.6.3(d) O&M Plan	Appendix C - Stormwater Ordinance (Phase II) 50.2	May 7, 2007
3.6.3(e) Deed Restrictions/Covenants	Appendix C - Stormwater Ordinance (Phase II) 40.2 and 40.3	May 7, 2007
3.6.3(f) Access Easements	Appendix C - Stormwater Ordinance (Phase II) 50.8	May 7, 2007
Permit Requirements for **Inspections and Enforcement**	Municipal Ordinance/Code Reference(s) and/or Document Title(s)	Date Adopted
3.6.2(b) Documentation	Appendix C - Stormwater Ordinance (Phase II) 50.1	May 7, 2007
3.6.2(c) Right of Entry	Appendix C - Stormwater Ordinance (Phase II) 50.2	May 7, 2007
3.6.4(a) Pre-CO Inspections	Appendix C - Stormwater Ordinance (Phase II) 30.3	May 7, 2007
3.6.4(b) Compliance with Plans	Appendix C - Stormwater Ordinance (Phase II) 30.3	May 7, 2007
3.6.4(c) Annual SCM Inspections	Appendix C - Stormwater Ordinance (Phase II) 50.3	May 7, 2007
3.6.4(d) Low Density Inspections	Appendix C - Stormwater Ordinance (Phase II) 40.2	May 7, 2007
3.6.4(e) Qualified Professional	Appendix C - Stormwater Ordinance (Phase II) 50.1	May 7, 2007
Permit Requirements for **Fecal Coliform Reduction**	Municipal Ordinance/Code Reference(s) and/or Document Title(s)	Date Adopted
3.6.6(a) Pet Waste	City Code Section 16-11	March 5, 1973
3.6.6(b) On-Site Domestic Wastewater Treatment	City Code Section 22-60	July 1, 2013

The post construction stormwater ordinance was adopted in 05.07.2007. It is noted that a new model ordinance has been endorsed by the State. The City of Conover will be adopting the State's template ordinance within Year One of the NPDES permit cycle. The section numbers above are subject to change. This will be in addition to the States' new model watershed ordinance.

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**

Table 20: Post Construction Site Runoff Control BMPs				
35.	**Standard Reporting**			
	Implement standardized tracking, documentation, inspections, and reporting mechanisms to compile appropriate data for the annual self-assessment process. Data shall be provided for each Post-Construction/ Qualifying Alternative Program being implemented as listed in Tables 18 and 19.	1. Track number of low density and high density plan reviews performed.	1. Continuously	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	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	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	4. Number of SCM inspections.
		5. Track number of low density inspections performed.	5. Continuously	5. Number of low density inspections.
		6. Track number and type of enforcement actions taken.	6. Continuously	6. Number and type of enforcement actions taken.
Permit Ref.	**2.3 and 3.6: Qualifying Alternative Program(s)** Measures to develop, implement and enforce additional BMPs in order to comply with the QAP state program requirements.			
BMP No.	**A**	**B**	**C**	**D**
	Description of BMP	**Measurable Goal(s)**	**Schedule for Implementation**	**Annual Reporting Metric**
36.	**Qualifying Alternative Program**			
	This permit requirement is fully met by the existing post-construction program, see references provided in Table 19.			

Table 20: Post Construction Site Runoff Control BMPs				
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** **Description of BMP**	**B** **Measurable Goal(s)**	**C** **Schedule for Implementation**	**D** **Annual Reporting Metric**
37.	**Phase II Post-construction Stormwater Ordinance**			
	The City has adopted and will maintain in effect the Phase II Stormwater Ordinance, which gives the City 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 in-place ordinance will be revised in the first permit year to follow the NCDEQ model ordinance. 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.	1. Update the existing stormwater ordinance to follow the current Phase II Stormwater Model Ordinance provided by NCDEQ.	1. Permit year 1	1. Was stormwater ordinance revised? Yes, no; Status; Date ordinance was revised.
		2. Train staff (field and office) in Stormwater Ordinance procedures and enforcement actions.	2. See BMP 49	2. See BMP 49
		3. Enforcement of the Phase II Post-construction Stormwater Ordinance to ensure compliance. Should the correct processes and order not be followed, a notice of violation will be issued to address the violation.	3. Continuously, Permit Years 1-5	3. 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				
Permit Ref.	**3.6.3: Plan Review and Approval** Measures to maintain plan review and approval authority, standards and procedures to: (a) Require Federal, State, and local government projects to comply with Post-Construction Program requirements throughout the entire MS4 permitted area, unless the entity is subject to its own NPDES MS4 permit or a qualifying alternative program, (b) Conduct site plan reviews of all new development and redeveloped sites that disturb greater than or equal to one acre, and sites that disturb less than one acre that are part of a larger common plan of development or sale for compliance with 15A NCAC 02H .1017 and the qualifying alternative programs that apply within your jurisdiction, (c) Ensure that each project has an Operation and Maintenance Agreement that complies with 15A NCAC 02H .1050(12), (d) Ensure that each project has an Operation and Maintenance Plan that complies with 15A NCAC 02H .1050(13), (e) Ensure that each project has recorded deed restrictions and protective covenants, that require the project to be maintained consistent with approved plans, and (f) Ensure that each SCM and associated maintenance accesses be protected in a permanent recorded easement per 15A NCAC 02H 1050 (9) and (10).			
BMP No.	**A** **Description of BMP**	**B** **Measurable Goal(s)**	**C** **Schedule for Implementation**	**D** **Annual Reporting Metric**
38.	**Plan Review and Approval**			
	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). All required submittals (as defined by the plan review procedures) must be received by the reviewer 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 City ordinance and SOP. The City of Conover issues their own certificates of occupancy. The CO is not issued until all stormwater requirements (designs, submittals, and inspections) are satisfied and the Stormwater Administrator approves the issuance.	1. Review procedures and submittal documents annually to determine if items need to be added or modified.	1. Annually, Permit Years 1-5	1. Were changes to the procedures/submittal documents needed? Yes, No; Status.
		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. The City holds the ability to have local engineering firms review stormwater SCM designs on an as-needed basis.	2. See BMP 35	2. See BMP 35

Table 20: Post Construction Site Runoff Control BMPs				
		3. Maintain the existing SCM Inventory sheet. Said sheet tracks all required submittals, relevant information, and all projects within the City that have gone through (and/or are going through) the stormwater review procedure.	3. See BMP 35	3. See BMP 35
39.	**Operation and Maintenance Agreement and Plan**			
	The Operation and Maintenance (O&M) agreement require owners of structural SCM's to perpetually maintain and operate according to the O&M plan submitted during the plan review process, and require submission of annual inspection reports written by a qualified professional.	1. Ensure that each project has an approved O&M Agreement and O&M Plan prior to CO, to be included in the project checklist and required prior to CO. Each O&M agreement will include a requirement for annual inspections.	1. Continuous Permit Years 1-5	1. Number of permitted projects with O&M plans that received their CO.
40.	**Recordation**			
	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. 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.	1. Ensure each project has recorded deed restrictions and protective covenants in effect to ensure development activities will be maintained consistent with the approved plans (low and high density projects).	1. See BMP 35	1. See BMP 35
		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.	2. See BMP 35	2. See BMP 35

Table 20: Post Construction Site Runoff Control BMPs				
Permit Ref.	**3.6.4: Inspections and Enforcement** Measures to maintain inspection and enforcement authority, standards and procedures to: (a) Conduct post-construction inspections prior to issuing a Certificate of Occupancy or a Temporary Certificate of Occupancy. Alternatively, the project owner may provide a surety bond to guarantee compliance with the approved plan(s), (b) Ensure that the project has been constructed in accordance with the approved plan(s), (c) Ensure annual inspection of each permitted SCM to ensure compliance with the approved Operation and Maintenance Agreement, (d) Ensure inspection of low density projects at least once during the permit term, and (e) Require that inspections be conducted by a qualified professional.			
BMP No.	**A** **Description of BMP**	**B** **Measurable Goal(s)**	**C** **Schedule for Implementation**	**D** **Annual Reporting Metric**
41.	**Inspection and Enforcement**			
	After project completion, but prior to issuance of a certificate of occupancy, an inspection will be completed by a qualified professional 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 watch for potential unpermitted expansion and apply enforcement if violations are found.	1. Prior to issuance of a CO, a qualified City 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.	1. Continuously Permit Years 1-5	1. Number of pre-CO inspections completed; Number of repeat inspections required.
		2. Staff will perform inspections of all SCMs (both government and non-government) within the City on an annual basis.	2. Annually, Permit Year 1-5	2. Number of SCM inspections completed; Number of failed SCM inspections.
		3. Owner shall have a Qualified Licensed Professional perform an SCM inspection in accordance with the O&M Agreement and DEQ SCM manuals once a year.	3. Annually Permit Year 1-5	3. Number of qualified licensed professional inspections completed with documentation received. Number of SCMs under annual inspection enforcement.

Table 20: Post Construction Site Runoff Control BMPs				
		4. Conduct inspection of 20% of low-density projects each year (See BMP 35 for inventory).	4. Annually Permit Years 1-5	4. Number of low density inspections done; Number of low density violators found; Number of low density enforcement actions issued.
Permit Ref.	**3.6.5: Documentation** Measures to maintain adequate documentation and standardized inspection and tracking mechanisms to: (a) Maintain an inventory of post-construction SCMs and low density projects, (b) Document, track and maintain records of inspections and enforcement actions. Tracking shall include the ability to identify chronic violators, and (c) Make available to developers all relevant ordinances, post-construction requirements, design standards, checklists, and/or other materials.			
BMP No.	**A** **Description of BMP**	**B** **Measurable Goal(s)**	**C** **Schedule for Implementation**	**D** **Annual Reporting Metric**
42.	**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 WPCOG 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. Create and Maintain a low density project inventory. The inventory will be created by using the existing zoning permit inventory to see which sites required a stormwater review previously.	1. See BMP 35	1. See BMP 35.
		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 41	2. See BMP 41

Table 20: Post Construction Site Runoff Control BMPs				
		3. Provide educational material 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.
43.	**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 to guarantee accessibility outside of office hours. Through tracking and inspections, chronic violators will be identified.	1. Create and maintain an inventory of all developments and redevelopments (public and private) with SCMs. Update inventory as projects are reviewed, approved, and constructed. The inventory will be created by using the existing zoning permit inventory to see which sites required a stormwater review previously.	1. See BMP 35	1. See BMP 35

Table 20: Post Construction Site Runoff Control BMPs				
		2. Provide educational material to developers about high density development. At a minimum, hyperlinks will be maintained on the City webpage 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 WPCOG 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.
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** **Description of BMP**	**B** **Measurable Goal(s)**	**C** **Schedule for Implementation**	**D** **Annual Reporting Metric**
44.	**Fecal Coliform Reduction**			

Table 20: Post Construction Site Runoff Control BMPs				
	Protective measures will be established through the adoption of the pet waste component of the Phase II Stormwater Model Ordinance in permit year 1.	1. Revision of the in-place stormwater ordinance to include the authority to enforce pet waste violations.	1. See BMP 37	1. See BMP 37
	Almost all of the City of Conover's wastewater is managed via a sewer system. Installation of septic systems is discouraged by the City, but is allowed should the sewer not be connectable to their property. Outside of those outlier cases, the only septic tanks in the MS4 area are remaining older tanks which are inspected by the County. 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.	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 City of Conover 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 (O & M)
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 City of Conover will manage, implement and report the pollution prevention and good housekeeping BMPs as specified in Table 21 below for each required program in response for the MS4 Audit inefficiencies. BMPs 45 and 46 will require a written inventory of facilities and potential pollutants. Several of the BMPs below address street and parking lot issues by developing, adopting, and maintaining procedures that focus on pollutant removal in these impervious areas, along with, Setting schedules and requirements for street/parking lot sweeping (BMP 58), collecting litter/debris (BMP 59), working in collaboration with community outreach program and developing standard spill procedures (BMP 47).

The City of Conover uses a vac-truck to clean the storm sewer conveyance system. An O & M plan had not been created and maintained at the time of the MS4 DEQ Audit. Permit Reference: 3.7.3, BMP's 48-51 focus on the training, inspection, and maintenance of said system.

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**
45.	**Municipal Facilities Operation & Maintenance (O & M) Plan**			

Table 21: Pollution Prevention and Good Housekeeping BMPs				
	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.	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. High pollution potential facilities will be inspected annually (See BMP 46).	1. See BMP 46	1. See BMP 46
		2. Develop a facility specific 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.	2. Permit Year 1	2. Number of facility O&M plans developed.
		3. Implement the written O&M Plan (per applicable facility).	3. Permit Year 1	3. Number of facility O&M plans implemented.
		4. Enforce and inspect the facilities to ensure compliance with the O&M Plans.	4. See BMP 46	4. See BMP 46
46.	**Municipal Facilities**			

Table 21: Pollution Prevention and Good Housekeeping BMPs				
	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. As an inventory of municipally owned facilities with stormwater pollution potential already exists (developed after the 2018 audit), any new municipal facilities built during the permit cycle will be evaluated and added to the list after the facilities completion.	1. Establish: standard operating procedures for municipal facility inspections, a schedule of inspections, and a standard for report documentation/tracking. These SOP's will be defined in each facility O&M plan. The procedures for inspections will be included in the City IDDE plan.	1. Permit Year 1	1. Were procedures established? Yes, No; Status; Date procedures established; Was an inspection schedule established? Date of schedule establishment.
		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.	2. Annually Permit Year 1-5	2. Number of facilities added to the pollution potential inventory.
		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.	3. Annually Permit Years 1-5	3. Number of facilities inspected; Number of SPCC permitted facilities inspected.

Table 21: Pollution Prevention and Good Housekeeping BMPs				
		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 49	5. See BMP 49
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**	**B**	**C**	**D**
	Description of BMP	**Measurable Goal(s)**	**Schedule for Implementation**	**Annual Reporting Metric**
47.	**Spill Response**			
		1. Maintain the existing spill response procedures in response to problems that may arise from implementation of spill procedures.	1. Annually Permit Years 1-5	1. Did spill response procedures need to be revised? Yes, No; Status.
		2. Train facility staff on spill response procedures.	2. See BMP 49	2. See BMP 49

Table 21: Pollution Prevention and Good Housekeeping BMPs				
	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. The definition of reportable spills will be written into each facility spill response plans following §143-215.85. The updated spill response procedures will be included in the written IDDE plan. Currently they focus primarily on public works facilities with spill potential but will be expanded to include more facility specific procedures as well.	3. 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.	3. Continuously, Permit Years 1-5	3. 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**
48.	**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 inspections 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				
	Plan must also be submitted to DEQ for approval. City of Conover Public Works already has maintenance procedures in place, these will be used when developing the MS4 O&M plan to ensure consistent and adequate maintenance is being done.	2. Submit the developed O&M Plan to DEQ for approval.	2. Permit Year 1	2. Was the O & M Plan approved by DEQ: Yes or No, Status; Date of submittal to DEQ.
		3. Implement the written and approved O&M Plan.	3. Permit Years 2-5	3. Was the O&M Plan implemented, Yes, No; Status.
		4. Administer the O&M Plan (See BMP 50 & 51).	4. Continuously, Permit Year 2-5	4. Number of MS4 inspections completed.
49.	**MS4 Training**			

Table 21: Pollution Prevention and Good Housekeeping BMPs				
	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. 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.	1. Hold MS4 training events to educate staff on MS4 topics listed in the referencing BMPs. The topics covered and number of participants will be recorded at each training.	1. Annually Permit Years 1-5	1. Number of trainings held; Number of personnel trained.
50.	**MS4 Inspection**			
	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.
51.	**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 City so chooses	1. Inspect all municipal catch basins and conveyances on an annual basis and/or upon report of maintenance being required.	1. See BMP 50	1. See BMP 50

Table 21: Pollution Prevention and Good Housekeeping BMPs				
	to do so. The City will utilize public works resources to maintain the MS4 infrastructure; or the issue will be included in the City's capital improvement project list, and appropriately prioritized depending on the nature of the repair.	2. Maintenance will be completed upon finding through inspection or receiving reports of MS4 infrastructure in poor condition.	2. Continuously, Permit Years 1-5	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 SCMs that are installed for compliance with the permittee's post-construction program. The permittee shall maintain a current inventory of SCMs, perform SCM inspections and maintenance, and shall establish specific frequencies, schedules, and documentation.			
BMP No.	**A** **Description of BMP**	**B** **Measurable Goal(s)**	**C** **Schedule for Implementation**	**D** **Annual Reporting Metric**
52.	**Municipal SCMs Operation & Maintenance (O & M) Plan**			
	The maintenance procedures and inventory of the municipal SCMs will be kept up to date. However, at the time of developing this SWMP the City of Conover does not currently have a municipally owned SCM. Should the City need to install one following expansion, these procedures will be followed.	1. Maintain an inventory of existing municipally-owned SCMs with information including type, year built, date of last inspection, and maintenance actions.	1. See BMP 35	1. See BMP 35
		2. Develop and maintain SCM Operation and Maintenance Plans for each municipally-owned SCM.	2. Continuously	2. Were any municipal SCM O&M's developed? Yes, No; Status. Number of municipal SCM's

Table 21: Pollution Prevention and Good Housekeeping BMPs				
		3. Review/Update SCM inventory as necessitated by new municipal development.	3. See BMP 53	3. See BMP 53
53.	**Municipal SCMs**			
	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. Municipal SCMs will be included in the SCM inventory sheet but differentiated by owner (municipally owned and privately owned). However, at the time of developing this SWMP the City of Conover does not currently have a municipally owned SCM. Should the City need to install one following expansion, these procedures will be followed.	1. Verify the existing list of municipal SCMs is correct by visiting the sites to determine type and condition. Done once per permit cycle.	1. Permit Year 1	1. Is the SCM list complete: Yes or No, Status (Location and type to be documented).
		2. Maintain Inventory of municipally owned SCMs. Add all new SCMs as they are constructed.	2. Continuously Permit Years 1-5	2. Did the inventory require any municipal SCMs to be added Yes, No; Status.
		3. Perform annual inspection and maintenance of municipally owned SCMs to ensure the operation and maintenance plan is being followed.	3. Annually Permit Years 1-5	3. Number of municipal SCMs inspections done.
		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.

Table 21: Pollution Prevention and Good Housekeeping BMPs				
		5. Should a municipal SCM be installed, Training on the maintenance of the SCM and its function shall be held.	5. See BMP 49	5. See BMP 49
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**
54.	**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.	1. Provide training to 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.	1. See BMP 49	1. See BMP 49
55.	**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 landscaping chemicals.	1. Annually Permit Years 1-5	1. Number of certified municipal 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.			

Table 21: Pollution Prevention and Good Housekeeping BMPs				
BMP No.	**A**	**B**	**C**	**D**
	Description of BMP	**Measurable Goal(s)**	**Schedule for Implementation**	**Annual Reporting Metric**
56.	**Vehicle and Equipment Cleaning**			
	Prevent or Minimize Contamination of Stormwater Runoff from all areas used for Vehicle and Equipment Cleaning. The City of Conover utilizes their municipal wash bay and most municipal facilities that hold vehicles have a wash bay of their own (police department and fire station). These wash basins drain into the sanitary sewer and are used to minimize runoff pollution from maintaining municipal vehicles. These specific procedures will be included in each facilities O&M plan.	1. Provide routine pollution prevention training to staff.	2. See BMP 49	2. See BMP 49
		2. Wash all municipal light vehicles, City emergency vehicles, and equipment using the method written in their facilities O&M plan.	2. Continuous Permit Years 1-5	2. Were municipal vehicles washed using the wash bay? Yes/No/Status
57.	**Vehicle and Equipment Maintenance**			
	Measures to ensure that the waste generated by vehicle maintained at municipal facilities (included, but not limited to, oils, any running fluids, batteries, belts and other non-fluid vehicle waste) is being disposed of properly.	1. Ensure the City has obtained a NPDES industrial permit for all subject municipal facilities/operations.	1. Permit Years 1	1. Have all municipal NPDES permits been obtained? Yes/No/Status Number of permitted municipal industrial facilities
		2. Perform waste inspections during facility inspections (See BMP 46).	2. See BMP 46	2. See BMP 46.

Table 21: Pollution Prevention and Good Housekeeping BMPs				
		3. Provide routine pollution prevention and waste management training to staff.	3. See BMP 49	3. See BMP 49
Permit Ref.	**3.7.7: Pavement Management Program** Measures to reduce pollutants in stormwater runoff from municipally-owned streets, roads, and parking lots within the permittee's corporate limits. The permittee shall implement measures to control litter, leaves, debris, particulate and fluid pollutants associated with vehicles, and establish specific frequencies, schedules, and documentation.			
BMP No.	**A** **Description of BMP**	**B** **Measurable Goal(s)**	**C** **Schedule for Implementation**	**D** **Annual Reporting Metric**
58.	**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. The City of Conover owns a street cleaning vehicle which is ran on a weekly basis.	1. Street/curb and gutter sweeping will be done weekly to reduce road pollutants in runoff.	1. Weekly Permit Years 1-5	1. Total number of lane miles swept.
59.	**Litter Management**			
	Collect litter in public areas and parking lots to reduce negative impacts on water quality.	1. City owned trash receptacles are emptied twice a week, or on an as needed basis.	1. Continuous Permit Years 1-5	1. Number of full time employees responsible;
		2. The City will host its annual "litter sweep day" to both collect litter and encourage public participation.	2. Annually Permit Years 1-5	2. Number of staff and/or volunteers at the litter sweep.
60.	**Leaf Collection and Yard Waste**			

Table 21: Pollution Prevention and Good Housekeeping BMPs				
	Implement measures to control leaves and debris within the municipal City limits (to include all properties).	1. Collect leaves with vacuum-style equipment from October 15 through January 15, with each street collected twice during this period.	1. Annually Permit Years 1-5	1. Volume of leaves collected
61.	**Vehicle Pollutant Management**			
	Measures to prevent and minimize contamination of stormwater runoff from vehicle pollutants following an accident.	1. Train first responders for minimizing, collecting and disposing of fluids and other vehicular pollutants following an accident.	1. Annually Permit Years 1-5	1. Number of first responders (staff) trained and date of training.
		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.