

**Municipal Separate Stormwater Sewer System (MS4)  
Technical Assistance and/or Compliance Evaluation Checklist**



## **OPENING MEETING**

### Introductions

Identify the purpose of the visit

- Program Compliance Evaluation
- Stronger coordination and working relationship with the State
- Better understanding of the state's expectations
- An opportunity to clarify any misunderstandings
- Improved State's knowledge of the permittee's stormwater program
- A more effective program

### Process

- Records Review
- Conduct Interviews
- Conduct Field Inspections
- Closing Conference

### Discussion

- SWMP planning documents and records
- Intergovernmental agreements and coordination
- Staff organization
- Select sites to visit
- Performance standards and goals
- Program assessment and evaluation
- Resource prioritization

### Questions

## **CLOSING CONFERENCE**

Programs reviewed

Records reviewed

Interviews

Field Inspections

Identify positive findings

Identify deficiencies (including root cause and recommended action)

Identify any repeat deficiencies

Identify recommendations to improve stormwater management

Identify any necessary follow up (i.e., missing records or documents)

Questions

## **DEFICIENCIES**

Results of the Compliance Evaluation are divided into four categories based on the severity of the deficiency as described below:

- Notice of Violation. Any permit noncompliance constitutes a violation of the Clean Water Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or denial of permit coverage upon renewal application.
- Notice of non-compliance: A finding that could result in a Notice of Violation, a fine or other enforcement action if corrective action is not taken.

- Discrepancies: A finding that would not likely cause a Notice of Violation, a fine, or other enforcement action. Discrepancies are normally a result of poor management practices, failure to follow installation Standard Operating Procedures, minor differences of interpretation or administration oversights.
- Recommendations: Recommendations represent practices that should be considered to improve the overall effectiveness of the program.

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**Municipal Separate Stormwater Sewer System (MS4)  
Technical Assistance and/or Compliance Evaluation Checklist**

**BACKGROUND INFORMATION**

**Permit Number**

SW100700 State or NPDES Stormwater Permit Number (s) issued to the permittee:

**Permittee Information**

SW100020 Name of Public Entity Seeking Permit Coverage  
SW100060 Jurisdictional Area (square miles)  
SW100070 Population

**MS4 System Information**

SW100130 River Basin(s)  
SW100150 Estimated percentage of jurisdictional area containing the following four land use activities  
    SW100160 Residential  
    SW100170 Commercial  
    SW100180 Industrial  
    SW100190 Open Space  
SW100210 Does the permittee have an inventory of major outfalls, storm water inlets, pipes, ditches, and open channels?

**Existing Local Water Quality Programs**

List the primary streams that receive stormwater runoff from the MS4. For each identify:

SW100280 River Basin  
SW100290 Receiving Stream Name  
SW100300 Stream Segment  
SW100310 Water Quality Classification

NC River Basins: <http://h2o.enr.state.nc.us/basinwide/whichbasin.htm>  
Stream Classifications: <http://h2o.enr.state.nc.us/csu/swcfaq.html>

SW100340 Does the permittee have a Local Nutrient Sensitive Waters Strategy? Yes/No  
SW100350 Does the permittee have a Local Water Supply Watershed Program? Yes/No  
SW100360 Does the permittee have a Delegated Erosion and Sediment Control Program? Yes/No  
SW100370 Does the permittee have a CAMA Land Use Plan? Yes/No

**Reliance on another entity perform one or more of your permit obligations**

SW100580 Does the permittee rely on another entity perform one or more of your permit obligations?  
SW100590 If yes, identify for each entity:

SW100600 Name of Entity  
SW100610 Element they will implement  
SW100620 Contact Person  
SW100630 Contact Address  
SW100640 Contact Telephone Number  
SW100650 Are legal agreements in place to establish responsibilities?

# **Municipal Separate Stormwater Sewer System (MS4) Technical Assistance and/or Compliance Evaluation Checklist**

**Co-Permit Information** (Complete this section only if co-permitting)

SW100510 If co-permit, provide the name of that entity:

SW100560 Have legal agreements been finalized between the co-permittees?

## **Interagency Agreements or Stormwater Partnerships**

Describe the Permittee's interagency agreements or stormwater partnerships (if any).

## **Contact Information**

Provide the following information for the person/position that will be responsible for day to day implementation and oversight of the stormwater program.

SW100940 Name

SW100950 Title

SW100960 Street Address

SW100970 PO Box

SW100980 City

SW100990 State

SW101000 Zip

SW101010 Telephone

SW101020 Fax

SW101030 E-Mail

## **Website Information**

SW101040 Permittee's Website:

## **BMPs**

SW101060 Does the permittee plan to add any new BMPs?

SW101070 Does the permittee plan to amend any existing BMPs?

SW101080 If yes, please provide a BMP description, measurable goal, and implementation schedule for each new or amended BMP. If further space is needed, attach additional sheets.

## **Contract Information**

SW101630 Does the permittee's Stormwater Management Program identify contract operations including:

- Transit Authorities
- Pesticide Application
- Construction Projects, Street Washing
- Maintenance of right-a-ways
- GIS Mapping
- Monitoring
- Stream Restorations
- Litter or Solid Waste
- Pickup
- Recycling
- Household Waste
- Other:

## **Municipal Separate Stormwater Sewer System (MS4) Technical Assistance and/or Compliance Evaluation Checklist**

### **Ordinance, Legal or Regulatory Authority**

SW107050 Has the permittee established necessary Legal or Regulatory Authority for the following:

- Illicit Discharge Detection & Elimination
- Erosion & Sediment Control
- Post-Development Stormwater Management
- Stormwater Ordinance
- Unified Development Ordinance
- Flood Damage Protection Ordinance
- Other:

### **Staff and Capital Improvement Projects**

SW106980 The number of staffed stormwater management position(s).

SW106990 The number of new stormwater management position(s) created or staffed for the reporting year.

SW107000 Total annual budget (excluding Capital Improvement Projects) for the NPDES stormwater management program for the reporting year.

SW107010 The number of Capital Improvement Projects planned.

SW107020 The number of Capital Improvement Projects active.

SW107030 The number of Capital Improvement Projects completed.

SW107040 Total annual budget for Capital Improvement Projects for the reporting year.

### **Organizational Chart**

SW101490 Does the permittee's Stormwater Management Program provide an organizational chart that shows where the responsible parties fit into the structure of the permittee's organization?

## **CONSTRUCTION SITE STORMWATER RUNOFF CONTROL**

### **Erosion and Sediment Control Program**

SW104200 Does the permittee rely on the NCDENR Division of Land Resources (DLR) Erosion and Sediment Control Program to comply with this minimum measure for private development? (If no, go to SW104220)

If the permittee relies on the NCDENR Division of Land Resources (DLR) Erosion and Sediment Control Program to comply with this minimum measure for private development, then the NCDENR Division of Land Resources Erosion and Sediment Control Program effectively meets the requirements of the Construction Site Runoff Controls by permitting and controlling development activities disturbing one or more acres of land surface and those activities less than one acre that are part of a larger common plan of development.

## **Municipal Separate Stormwater Sewer System (MS4) Technical Assistance and/or Compliance Evaluation Checklist**

SW104220 Does the permittee rely on a locally delegated program to meet the minimum measure for private development requirements? (If no, go to SW104300)

SW104230 If the permittee relies on a local government to comply with this minimum measure, does the permittee conduct random inspections of local land disturbing activities that have a sediment and erosion control permit, issued by local government?

SW104260 If the permittee relies on a local government to comply with this minimum measure, does the permittee report unresolved concerns to the local government?

SW104270 If the permittee relies on a local government to comply with this minimum measure, does the permittee maintain a record of unresolved concerns reported to the local government?

SW104300 Does the permittee have a delegated program to meet the requirements of an Erosion and Sediment Control Program for private development? (If no go to SW104450)

SW104320 Does the Stormwater Management Program describe the mechanism (ordinance or other regulatory mechanism) the permittee will use to require erosion and sediment controls at construction sites and why the permittee chose that mechanism? If permittee needs to develop this mechanism, the permittee's plan should describe the plan and a schedule to do so.

SW104340 Does the Permittee conduct site plan review(s), including the review of pre-construction site plans, which incorporate consideration of potential water quality impacts?

The Stormwater Management Program must describe procedures and the rationale for how permittee will identify certain sites for site plan review, if not all plans are reviewed and describe the estimated number and percentage of sites that will have pre-construction site plans reviewed.

Who does the permittee review of the Erosion and Sedimentation Control Plans?

Does the Permittee have an SOP, SOG, or checklist for the review of the Erosion and Sedimentation Control Plans?

SW104530 The number of plans reviewed greater than one acre.

SW104360 Does the Stormwater Management Program describe the permittee's plan to ensure compliance with the permittee's erosion and sediment control regulatory mechanism, including the sanctions and enforcement mechanisms permittee will use to ensure compliance?

How does the Permittee notify site owners/operators of their responsibilities under the City, County, or State program?

What training does the Permittee provide for construction site operators?

How does the Permittee determine that site owners or operators select appropriate BMPs for their construction sites?

How often does the Permittee inspect construction sites?

How does the Permittee prioritize the construction sites for inspections?

What criteria are used to determine compliance at the construction site?

What types of things do inspectors look for or observe during an inspection?

## **Municipal Separate Stormwater Sewer System (MS4) Technical Assistance and/or Compliance Evaluation Checklist**

Does the Permittee's inspectors check the construction site SWPPP, site maps, monitoring and reporting records, inspection records, and records of spills?

How long does a typical inspection take?

Does the Permittee have a checklist for inspecting construction sites?

SW104370 The Stormwater Management Program must describe the permittee's procedures for when the permittee will use certain sanctions. Possible sanctions include non-monetary penalties (such as a stop work orders), fines, bonding requirements, and/or permit denials for non-compliance.

What are the Permittee's enforcement procedures for instances of non-compliance?

Does the Permittee have adequate enforcement authority?

SW104590 The number of enforcement actions or NOVs taken in the last 12 months?

SW104380 Does the Stormwater Management Program describe the permittee's procedures for site inspection and enforcement of control measures, including how the permittee will prioritize sites for inspection?

SW104430 Does the Stormwater Management Program require construction site operators to implement erosion and sediment control BMPs and to control construction site wastes that may cause adverse water quality impacts?

SW104440 Does the Stormwater Management Program 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 impacts to water quality?

SW104450 Does the permittee provide and promote a means for the public to notify the appropriate authorities of observed erosion and sedimentation problems?

### **Staff Training and Certification**

What types of training or experience do inspectors have?

SW104480 The number of training and certification programs offered to staff.

SW104490 The number of trained staff inspectors.

SW104500 The number of certified staff inspectors.

SW104510 The number of certified contractors by permittee.

### **ILLICIT DISCHARGE DETECTION AND ELIMINATION**

#### **Stormwater Map**

SW103220 Has the permittee developed or in the process of developing a storm sewer map showing the location of all outfalls and the names and location of all receiving waters?

SW103260 Does stormwater mapping include drainage areas?

SW103270 Does stormwater mapping include receiving streams?

SW103280 Does stormwater infrastructure mapping include outfalls?

SW103300 Does stormwater infrastructure mapping include sewer pipes?

## **Municipal Separate Stormwater Sewer System (MS4) Technical Assistance and/or Compliance Evaluation Checklist**

SW103310 Does stormwater infrastructure mapping include structures (e.g., detention ponds and other structural BMPs)?

SW103320 Estimated or actual number of structural BMPs?

SW103330 Percent of outfall mapping complete.

### **Ordinance**

SW103340 Does the Stormwater Management Program describe the mechanism (ordinance or other regulatory mechanism) the permittee will use to effectively prohibit illicit discharges into the MS4?

Describe the Permittee's legal authority for the illicit discharge detection and elimination program?

Does the Permittee have Right-of Entry for the illicit discharge detection and elimination program?

SW103350 Does the Stormwater Management Program describe the permittee's plan to ensure appropriate enforcement procedures and actions such that the permittee's illicit discharge ordinance (or other regulatory mechanism) is implemented?

Who is responsible for implementing the field investigations?

Does the Permittee coordinate with other City, State, or County organizations regarding finding or eliminating illicit discharges?

When illicit discharges are found, who follows up to ensure that the illicit discharge is eliminated?

How many field investigations were conducted in the past 12 months?

How does the Permittee prioritize follow-up activities?

What are your enforcement procedures if needed for cases of illicit discharges?

Do you feel that the Permittee has adequate enforcement authority?

How does the Permittee train investigators?

SW103360 Does the Stormwater Management Program describe the permittee's plan to detect and address illicit discharges to the permittee's system, including discharges from illegal dumping and spills?

The permittee must implement an inspection program to detect dry weather flows at system outfalls and, at a minimum, must address the following:

- Procedures for locating priority areas.
- Procedures for tracing the source of an illicit discharge, including the specific techniques permittee will use to detect the location of the source.
- Procedures for removing the source of the illicit discharge.
- Procedures for evaluation of the plan to detect and eliminate illicit discharges.

Describe the Permittee's dry weather screening program.

How were the sites selected?

What is the screening schedule?

Who is responsible to conduct screening?

Do you have written procedures, SOPs, or SOGs?

How does the Permittee train employees?

## **Municipal Separate Stormwater Sewer System (MS4) Technical Assistance and/or Compliance Evaluation Checklist**

SW103420 Does the Stormwater Management Program address the following categories of non-storm water discharges or flows (i.e., illicit discharges) only if permittee identify them as significant contributors of pollutants to the permitteenulls small MS4:

- SW103430 landscape irrigation;
- SW103440 water line flushing;
- SW103450 diverted stream flows;
- SW103460 uncontaminated groundwater infiltration;
- SW103470 discharges from potable water sources;
- SW103480 air conditioning condensate (commercial/residential);
- SW103490 springs;
- SW103500 footing drains;
- SW103510 residential and charity car washing;
- SW103520 dechlorinated swimming pool discharges;
- SW103530 rising groundwaters;
- SW103540 uncontaminated pumped groundwater;
- SW103550 foundation drains;
- SW103560 irrigation waters (does not include reclaimed water as described in 15A NCAC 2H .0200);
- SW103570 water from crawl space pumps;
- SW103580 lawn watering;
- SW103590 flows from riparian habitats and wetlands;
- SW103600 street wash water;
- SW103610 flows from emergency fire fighting.

The permittee may also develop a list of other similar occasional, incidental non-storm water discharges that will not be addressed as illicit discharges. These non-storm water discharges must not be reasonably expected (based on information available to the permittees) to be significant sources of pollutants to the Municipal Separate Storm Sewer System, because of either the nature of the discharges or conditions the permittee has established for allowing these discharges to the permittee's MS4 (e.g., activity with appropriate controls on frequency, proximity to sensitive waterbodies, BMPs).

SW103640 Does the Stormwater Management Program document local controls or conditions placed on discharges and a provision prohibiting any individual non-storm water discharge that is determined to be contributing significant amounts of pollutants to the permittee's MS4?

SW103650 In addition to conducting training for selected staff on detecting and reporting illicit discharges," does the Stormwater Management Program describe how the permittee plans to inform businesses and the general public of hazards associated with illegal discharges and improper disposal of waste?

SW103700 Does the Stormwater Management Program establish and publicize a reporting mechanism for the public to report illicit discharges?

SW103710 Does the Stormwater Management Program establish an illicit discharge management tracking system?

SW103720 Does the Stormwater Management Program establish a stormwater incident response program?

SW103730 Does the Stormwater Management Program provide for an illicit discharge brochure, poster or other educational material development and distribution?

## **Municipal Separate Stormwater Sewer System (MS4) Technical Assistance and/or Compliance Evaluation Checklist**

SW103740 Does the Stormwater Management Program provide for a septic system program in conjunction with the Health Department?

SW103750 Does the Stormwater Management Program provide street sweeping, inspecting and cleaning inlets and outfalls?

SW103760 Does the Stormwater Management Program establish procedures to coordinate efforts to eliminate illicit discharge cross connections between sanitary and storm sewers?

SW103770 Does the Stormwater Management Program establish procedures to maintain the sanitary sewer system?

SW103780 Does the Stormwater Management Program establish a Household Waste Recycling Program?

### **Identifying Illicit Connections and Illegal Dumping**

SW103860 The number of sites prioritized for inspection.

SW103870 The number of illicit connections reported by citizens.

SW103880 The number of illicit connections found.

SW103890 The number of illicit connections repaired/replaced.

SW103900 The number of illicit connection referrals.

SW103930 The number of illegal dumps reported by citizens.

SW103940 The number of penalties enforced upon the participants of illegal dumps.

SW103950 The number of illegal dump or sit-out clean-ups completed.

Describe the Permittee's program to promote, publicize and facilitate public reporting of illicit discharges and illegal dumping.

### **Industrial or Business Connections**

SW103980 The number of dry weather tests/inspections completed.

SW103990 The number of high-risk connections prioritized.

SW104000 The number of illicit connections reported by employees or businesses.

SW104010 The number of illicit connections found.

SW104020 The number of illicit connections repaired/replaced.

### **Sanitary Sewer Overflows (SSO)**

SW104100 The number of overflows reported.

SW104110 The number of overflow causes that were identified during inspections.

SW104120 The number of sites repaired.

### **Wastewater Connections to the Storm Drain System**

SW104140 The number of rerouted connections.

SW104150 The number of dry weather monitoring activities performed.

SW104160 The number of unwarranted connections reported.

SW104170 The number of unwarranted connections found.

SW104180 The number of unwarranted connections repaired/replaced.

**Municipal Separate Stormwater Sewer System (MS4)  
Technical Assistance and/or Compliance Evaluation Checklist**

**POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS**

SW105770 Does the Stormwater Management Program list the permittee's municipal operations that are impacted by this operation and maintenance program? Municipal Operations include:

- Transfer Station
- Fleet Maintenance
- Airport
- Animal Shelters
- Waste Water Treatment Plan
- Water Plants
- Construction Debris Site
- Transit Authority
- Public Works Operations
- Prisons
- Emergency Service Facilities
- Fire Stations
- Landfills
- Schools
- Parks
- Waste Recycling Centers
- Vehicle Maintenance Operations
- Vehicle Wash Operations
- Pump Stations or Lift Stations
- Other:

Note which municipal operations and industrial facilities have a Stormwater Pollution Prevention Plan (SWPPP)?

The permittee must also include a list of industrial facilities the permittee owns or operates that are subject to NPDES Stormwater General Permits or individual NPDES permits for discharges of storm water associated with industrial activity that ultimately discharge to the permittee's MS4, including the permit number and certificate of coverage number for each facility.

How often does the Permittee update the municipal operations and industrial facilities?

SW106000 In addition to conducting staff training on stormwater pollution prevention and good housekeeping procedures, does the Stormwater Management Program describe any government employee training program the permittee will use to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm water system maintenance?

SW106010 Does the Stormwater Management Program describe any existing, available training materials the permittee plans to use?

SW106030 Does the Stormwater Management Program describe maintenance activities, maintenance schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants to the permittee's MS4?

SW106050 Does the Stormwater Management Program describe the permittee's procedures for the proper disposal of waste removed from the permittee's MS4 and the permittee's municipal operations, including dredge spoil, accumulated sediments, floatables, and other debris?

# **Municipal Separate Stormwater Sewer System (MS4) Technical Assistance and/or Compliance Evaluation Checklist**

## **Industrial Activities**

SW106120 Did the permittee conduct annual review of the industrial activities with a Phase I NPDES stormwater permit owned and operated by the permittee?

SW106130 Did the permittee review the Stormwater Pollution Prevention Plan, the timeliness of any monitoring reports required by the Phase I permit, and the results of inspections and subsequent follow-up actions at the facilities?

SW106160 Does the permittee have a Used Oil Recycling Program?

SW106170 Does the permittee have a street sweeping program?

SW106180 Does the permittee have a program to clean catch basins, storm lines, and ditches?

SW106190 Does the permittee review fertilizer and pesticide use programs?

SW106200 Does the permittee have spill prevention plans at city facilities?

## **Facilities Inspections**

How often does the Permittee inspect municipal operations and industrial facilities?

How does the Permittee prioritize the inspections of municipal operations and industrial facilities?

What criteria are used to evaluate compliance at municipal operations and industrial facilities?

What types of things does the Permittee's inspector observe or look for during an inspection?

Does the Permittee have an SOP, SOG, or checklist for conduction inspections?

Does the inspector check municipal operation's and industrial facility's SWPPP, site maps, monitoring and reporting records, inspection records, and records of spills?

How long does a typical inspection take?

What type of training or experience do Permittee's inspectors have?

What are the Permittee's procedures for instances of non-compliance?

Has the Permittee taken any action for instances of non-compliance?

SW106220 Does the permittee inspect the following:

- Vehicle washing
- Vehicle fueling
- Vehicle maintenance areas
- Material storage areas (i.e., sand, salt, fertilizers, pesticides and other chemicals)
- Stormwater outfalls
- Culverts, Swales and/or ditches
- Catch basins, inlets, and grates
- MS4 pipes
- Solid and hazardous waste management facilities and recycling centers
- Animal shelters
- Parking lots
- Parks and open spaces

## **Municipal Separate Stormwater Sewer System (MS4) Technical Assistance and/or Compliance Evaluation Checklist**

SW106330 The number of inspections conducted.

### **Hazardous Materials Storage**

SW106460 The total number of storage facilities equipped to store hazardous materials.

SW106470 The number of regularly inspected storage units.

SW106480 The number of employees trained in hazardous material storage and maintenance.

### **Illegal Dumping**

SW106520 The number of reports of illegal dumping received.

How does the Permittee prioritize activities?

SW106530 The number of dump sites and/or illegal sit-outs cleaned up.

How does the Permittee prioritize activities?

SW106550 The number of enforcement actions pertaining to illegal dumping.

What are the Permittee's enforcement procedures?

Describe the Permittee's program to promote, publicize and facilitate proper management and disposal of litter, illegal sit-outs, household waste, yard waste, used oil and toxic materials.

### **Landscape and Lawn Care, and Pest Control**

SW106570 The number of stores/gardens participating in education programs.

SW106580 The number of residents trained by the permittee in safe landscaping, lawn care, and pest management techniques.

SW106590 The number of classes/seminars offered by the permittee in landscaping and lawn care.

What information has the Permittee provided to the public/commercial applicators regarding PHF application?

SW106610 The number of municipal employees trained in integrated pest management.

Does the Permittee use Restricted Use Pesticides (RUPs)?

Who applies RUPs?

Do they have a license?

What SOPs or SOGs does the Permittee have in place for employees or contractors to minimize the use and to ensure the proper use and storage of PHFs?

### **Parking Lot and Street Cleaning**

Describe the Permittee's street maintenance program?

SW106630 The number of parking lots.

SW106640 The number of scheduled parking lot and/or road cleanings.

# **Municipal Separate Stormwater Sewer System (MS4) Technical Assistance and/or Compliance Evaluation Checklist**

## **Pet Waste**

SW106660 The number of dog parks.

SW106670 The number of "pooper-scooper" stations installed

SW106680 The number of educational materials distributed.

## **Road Salt Application and Storage**

SW106700 The number of storage facilities included in a regular inspection and maintenance program.

SW106710 The number of employees trained in road salt application.

SW106720 The quantity of salt applied to roadways (in tons).

SW106730 The quantity of alternative products used (in tons).

## **Spill Response and Prevention**

What agencies are responsible for responding to spills?

Does the Permittee have a written spill response procedure?

SW106810 The number of leak detection devices installed at municipal facilities.

SW106820 The number of preventative maintenance procedures performed on tanks, valves, pumps, pipes, and other equipment.

SW106830 The number of personnel trained in spill response.

How does the Permittee train employees in spill prevention and spill response?

## **Storm Drain System Cleaning**

Describe your operation and maintenance practices/procedures and schedule for stormwater sewer lines, culverts and catch basins owned or operated by the Permittee?

SW106870 The number of outfalls cleaned regularly.

SW106880 The number of storm drains cleaned regularly.

SW106890 The amount of trash, sediment, and other pollutants removed during cleaning (in tons).

## **Used Oil Recycling**

SW106910 The number of gallons of used oil collected from municipal operations.

SW106920 The number of recycling facilities that collect oil from municipal operations.

SW106930 The number of educational materials distributed to municipal employees.

## **Vehicle Washing**

SW106950 The number of educational materials distributed to municipal employees.

## **Municipal Separate Stormwater Sewer System (MS4) Technical Assistance and/or Compliance Evaluation Checklist**

SW106960 The number of designated municipal vehicle washing areas.

### **Wastewater and Water Distribution (Controls Limiting Sanitary Sewer Inflow and Infiltration (I&I))**

Does the Permittee have a stormwater discharge permit for the WWTP?

Have there been any sanitary sewer overflows (SSO)?

What are the primary causes of SSO (i.e., blockage, failed pipes or lift stations)?

Do stormwater sewer systems, water supplies and sanitary sewer systems share a common trench?

Has the Permittee conducted an assessment of the sanitary sewer system?

- Is the sanitary sewer system tight?
- Has the Permittee identified any cross connections in the past 12 months?
- Has the Permittee identified any infiltration or in-flow (I&I)?
- Has the Permittee identified failed septic systems?
- Does the Permittee conduct field investigations?

What steps, including enforcement, does the Permittee take when they identify cross connection, infiltration, failed septic system, or SSO?

What is the status of the Permittee's sanitary sewer inspection and mapping program?

### **POST-CONSTRUCTION STORM WATER MANAGEMENT**

SW104910 Has the permittee developed an ordinance or other regulatory mechanism to implement and enforce a program to address post construction runoff from new development and redevelopment projects?

Describe the Permittee's review process for reviewing stormwater management plans.

How many staff conduct reviews?

What are the Permittee's staff training/experience requirements for implementation of the review and approval process?

Does the Permittee have a checklist/SOP for conducting reviews of submitted plans?

How many inspections has the staff conducted?

Describe the Permittee's post-construction inspection procedures?

What findings or deficiencies have the inspections identified?

What technical standards for structural and non-structural BMPs does the Permittee use?

SW104930 Does the Stormwater Management Program describe how the permittee will ensure the long-term operation and maintenance (O&M) of BMPs?

Describe the types and number of structural stormwater controls the Permittee owns/operates?  
Including, but not limited to:

- Bioretention Basins
- Alternative pavers and porous pavement

## **Municipal Separate Stormwater Sewer System (MS4) Technical Assistance and/or Compliance Evaluation Checklist**

- Buffer zones
- Dry and wet ponds
- Alternatives to curb and gutter
- Grass swales and filter strips
- Infiltration basins and trenches
- Manufactured products installed in storm water inlets
- On-lot treatment
- Open space design
- Sand and organic filters
- Stormwater wetlands

Describe your operation and maintenance practices/procedures and schedule for structural stormwater controls owned/operated by the Permittee?

How are Permittee owned/operated structural stormwater controls prioritized for inspections?

Describe the types and number of privately owned/operated structural stormwater?

Describe your maintenance program for privately owned/operated structural stormwater controls for new residential areas? Existing residential areas? Commercial/industrial sites?

Does the Permittee have a tracking program for maintenance activities?

How does the Permittee respond to structural control maintenance complaints?

How does the Permittee prioritize maintenance needs?

What requirements has the Permittee established that privately owned/operated stormwater management structures are maintained?

How many privately owned/operated structural stormwater controls has the Permittee inspected?

Who does the inspections?

How are structural stormwater controls prioritized for inspections?

What legal and enforcement authorities are in place for maintaining privately owned/operated stormwater management structures?

Has the Permittee taken enforcement action in instances where the responsible party is not maintaining stormwater management structures?

SW105000 Does the Stormwater Management Program explain how the permittee will control the sources of fecal coliform to the maximum extent practicable?

SW105010 Do new development and redevelopment codes allow for the following:

- SW105020 Bioretention basins?
- SW105030 Alternative pavers?
- SW105040 Buffer zones?
- SW105050 Dry ponds?
- SW105060 Wet ponds?
- SW105070 Alternatives to curb and gutter?
- SW105080 Grass swales?
- SW105090 Grassed filter strips?
- SW105100 Green parking lots?

## **Municipal Separate Stormwater Sewer System (MS4) Technical Assistance and/or Compliance Evaluation Checklist**

- SW105110 In-line storage systems?
- SW105120 Infiltration basins?
- SW105130 Infiltration trenches?
- SW105140 Manufactured products installed in storm water inlets?
- SW105150 Developments and redevelopments that use narrow streets?
- SW105160 On-lot treatment?
- SW105170 Open space design?
- SW105180 Sand and organic filters?
- SW105190 Porous pavement?
- SW105200 Stormwater wetlands?
- SW105210 Urban forestry?

SW105220 Does the Stormwater Management Program, in coordination with the County Health Department, ensure proper operation and maintenance of on-site wastewater treatment systems for domestic wastewater?

SW105230 Does the Stormwater Management Program provide training for staff and developers?

SW105270 Are annual inspection reports required of permitted structural BMPs performed by a qualified professional?

SW105280 The number of BMP inspections and/or maintenance activities.

SW105290 The number of problems that were identified and remedied.

SW105310 The number of development/redevelopment projects regulated for post-construction stormwater control.

SW105560 For those areas within the jurisdictional area of the permittee that are not subject to the post-construction stormwater management provisions of another existing state stormwater management program, does the permittee's Post-construction Stormwater Management Program equal or exceed the stormwater management and water quality protection provided by the following model practices:

SW105570 Does the permittee issue local stormwater management permits to new development or redevelopment projects as either a low density project or a high density project?

SW105580 Do projects permitted as a low density projects meet the following criteria:

- SW105590 No more than two dwelling units per acre or 24% built-upon area; and,
- SW105600 Use of vegetated conveyances to the maximum extent practicable?

SW105610 Are projects permitted as high density projects meet the following requirements:

- SW105620 The stormwater control measures control and treat the difference between the pre-development and post-development conditions for the 1-year 24-hour storm **or** control and treat the first inch **or** the first inch and a half. Runoff volume draw-down time must be a minimum of 48 hours, but not more than 120 hours;
- SW105630 All structural stormwater treatment systems are designed to achieve 85% average annual removal of total suspended solids; and
- SW105640 Stormwater management measures comply with the General Engineering Design Criteria For All Projects requirements listed in 15A NCAC 2H .1008(c);

SW105650 Are deed restrictions and/or protective covenants required by the locally issued permit and incorporated by the development to ensure that subsequent development activities maintain the development (or redevelopment) consistent with the approved plans?

## **Municipal Separate Stormwater Sewer System (MS4) Technical Assistance and/or Compliance Evaluation Checklist**

SW105660 Are all built-upon areas at least 30 feet landward of perennial and intermittent surface waters?

SW105670 Watershed Protection Plans: Has the Permittee developed, adopted, and implemented a comprehensive watershed protection plan to meet part, or all, of the requirements for post construction stormwater management?

Areas within the jurisdictional area of the permittee that are already subject to the existing state stormwater management programs are deemed compliant with the post-construction stormwater management model practices identified in (a). The programs are: the Water Supply Watershed protection programs for WS-I – WS-IV waters, the Fresh water HQW and ORW waters management strategies, the Neuse River Basin Nutrient Sensitive Waters (NSW) Management Strategy, the Tar-Pamlico River Basin Nutrient NSW Strategy, and the Randleman Lake Water Supply Watershed program. A regulated entity may develop its own comprehensive watershed plan, use the model ordinance developed by the Commission, design its own post-construction practices based on the Division's guidance and engineering standards for best management practices, or incorporate the post-construction model practices to satisfy, in whole or in part, the requirements for post-construction stormwater management.

SW105700 Has the permittee developed, adopted, and implemented an ordinance (or similar regulatory mechanism) to ensure that the best management practices selected do not result in a sustained increase in the receiving water temperature for Trout Waters?

SW105710 Has the permittee developed, adopted, and implemented an ordinance (or similar regulatory mechanism) to ensure that the best management practices for reducing nutrient loading is selected for Nutrient Sensitive Waters?

SW105730 Has the permittee developed and included a nutrient application (fertilizer and organic nutrients) management program in the Post-construction Stormwater Management Program?

### **PUBLIC EDUCATION AND OUTREACH**

SW101710 Does the Stormwater Management Program identify the target audiences likely to have significant storm water impacts (including commercial, industrial and institutional entities)?

SW101720 Does the Stormwater Management Program identify what target pollutant sources the permittee's public education program is designed to address and why those sources are an issue?

SW101730 Does the Stormwater Management Program describe the permittee's outreach program (i.e., how the permittee plans to inform individuals and households about the steps they can take to reduce storm water pollution and how the permittee plans to inform individuals and groups on how to become involved in the storm water program?

SW101750 Has the permittee develop general stormwater educational material to appropriate target groups?

SW101760 Does general stormwater educational material include information on the following topics:

- SW101770 Household Hazardous Waste and Used Oil
- SW101780 Pet Waste
- SW101790 Septic Systems
- SW101800 Lawn and Gardening
- SW101810 Vehicle Washing
- SW101820 Erosion
- SW101830 Stream Buffers
- SW101840 Flooding
- SW101850 Litter

## **Municipal Separate Stormwater Sewer System (MS4) Technical Assistance and/or Compliance Evaluation Checklist**

SW101860 List any additional topics not identified above.

SW101870 Does the permittee's outreach program include:

- SW101880 Distributing printed educational material to general public through utility mail outs?
- SW101890 Distributing printed educational material to general public through special events (i.e., Information booth at festivals and fairs)?
- SW101900 Distributing printed educational material to business / industry?
- SW101910 Presentations to local community groups?
- SW101920 Stormwater programs/presentations for elementary or middle schools?
- SW101930 Local TV or radio spots?
- SW101940 Print Media - Ads / Articles / Newsletters?
- SW101950 Posters?
- SW101960 Storm drain stenciling
- SW101970 Other environmental education programs (i.e., Designate a "Keep SW Clean" month)?
- SW101980 Workshops
- SW101990 Stream basin signage?

SW102020 Does the permittee maintain an internet web site for newsletter articles on stormwater, information on water quality, stormwater projects and activities, and ways to contact stormwater management program staff?

### **Classroom Outreach**

- SW102070 The number of educational materials distributed to schools.
- SW102080 The number of schools that participate in municipal-sponsored storm water workshops or activities.
- SW102090 The number of students that participate in municipal-sponsored storm water workshops or activities.
- SW102100 The number of workshops held for teachers.
- SW102110 The number of certificates or other rewards given out to schools, classes, or students participating in storm water education.
- SW102120 The number of students receiving storm water education as a regular part of the school curriculum.

### **Displays, Signs, Presentations, Welcome Packets, and Pamphlets**

- SW102150 The number of stormwater related displays at special events or meetings.
- SW102160 The number of people at events who saw the display or took a pamphlet/booklet.
- SW102170 The number of new homeowner welcome packets containing storm-water-related information.
- SW102180 The number of signs and billboards with stormwater related messages.
- SW102190 The number of stormwater related presentations at special events or meetings.

### **Commercial Outreach**

- SW102210 The number of educational materials that were distributed to business owners and operators.
- SW102220 The number of businesses trained under the stormwater program.

### **Pet Waste Management**

- SW102320 The number of "clean up after your pet" signs posted in parks and neighborhoods.
- SW102330 The number of dog-walking designated areas in parks.
- SW102340 The number of posters/brochures put up in pet supply stores.
- SW102350 The number of educational materials given out to pet owners.

# **Municipal Separate Stormwater Sewer System (MS4) Technical Assistance and/or Compliance Evaluation Checklist**

## **Promotional Giveaways**

- SW102370 The number of items given out.
- SW102380 The number of events attended (to give out items).
- SW102390 The number of partnerships for promotions (radio, TV, Businesses).

## **Proper Disposal of Household Hazardous Waste**

- SW102410 The number of household hazardous waste curbside pickup days.
- SW102420 The number of educational materials distributed to homeowners.
- SW102430 The number of partnerships established with businesses.

## **Outreach Programs to Minority and Disadvantaged**

- SW102450 The number of brochures/posters created in non-English languages.
- SW102460 The number of educational materials distributed in non-English languages.
- SW102470 The number of partnerships established with minority organizations.
- SW102480 The number of educational materials distributed to low-income neighborhoods.
- SW102490 Attendance at workshops or public meetings held in low-income or minority neighborhoods.

## **Using the Media**

- SW102550 The number of public service announcements made on radio and TV.
- SW102560 The number of stormwater related press releases/advertising.
- SW102570 The number of stormwater related articles published.
- SW102580 Water Conservation for Home Owners
- SW102590 The number of partnerships established with local water utilities.
- SW102600 The number of water conservation or stormwater related utility inserts that are distributed with utility bills.
- SW102610 A survey of homeowners about their water conservation behavior before and after the message is delivered.

## **PUBLIC INVOLVEMENT AND PARTICIPATION**

SW102640 Does the Stormwater Management Program identify the target audiences of the permittee's public involvement program, including a description of the types of ethnic and economic groups engaged?

SW102650 Permittee are encouraged to actively involve all potentially affected stakeholder groups, including commercial and industrial businesses, trade associations, environmental groups, homeowners associations, and educational organizations, among others.

SW102660 Does the Stormwater Management Program describe how the permittee will involve the public in the development and implementation of the permittee's storm water management program and the types of public involvement activities included in the permittee's program that the permittee plans to use to educate local community groups?

SW102670 Has the permittee provided for the means to involve the public in the development and implementation of the permittee's storm water management program through:

- SW102680 Public Hearings, stakeholder meetings, or other meetings?
- SW102690 A Stormwater Steering Committee (or similar advisory group)?
- SW102700 Stream clean-up events?
- SW102710 Adopt-a-stream, Adopt-a-drain, Adopt-a-highway or Adopt-a-trail program?
- SW102720 Reforestation programs or wetland planting programs?
- SW102730 A stormwater hotline?
- SW102740 Volunteer monitoring programs?

## **Municipal Separate Stormwater Sewer System (MS4) Technical Assistance and/or Compliance Evaluation Checklist**

- SW102750 Storm drain stenciling?
- SW102760 Encourage neighborhood coordinators to become active in the program?
- SW102770 Regional workshops?
- SW102780 Telephone/Web/Mall surveys?
- SW102790 Working with citizen volunteers willing to educate others about the program?

### **Adopt-A-Stream Program**

- SW102840 The number of participants in Adopt-A-Stream, Adopt-a-drain, Adopt-a-highway or Adopt-a-trail programs.
- SW102850 The quantity of trash and debris removed by Adopt-A-Stream, Adopt-a-drain, Adopt-a-highway or Adopt-a-trail volunteers (in tons).

### **Surveys**

- SW102870 The number of citizens solicited to complete surveys.
- SW102880 The number of completed surveys.

### **Hotlines**

- SW102900 The number of calls received by a hotline(s).
- SW102910 The number of problems/incidents remedied as a result of hotline calls.

### **Reforestation Programs**

- SW102930 The number of volunteer tree planters.
- SW102940 The number of trees planted.
- SW102950 The number of acres planted with trees.

### **Public Hearings, stakeholder meetings, or other meetings**

- SW102970 The number of meetings held.
- SW102980 The number of attendees.
- SW102990 The number of actions taken as a result of stakeholder meetings.

### **Storm Drain Stenciling**

- SW103010 The percent of drains stenciled.
- SW103020 The number of stenciling volunteers.
- SW103030 The number of drains stenciled.

### **Stream Cleanup**

- SW103050 The number of stream cleanups.
- SW103060 The number of cleanup participants.
- SW103070 The quantity of waste collected as a result of cleanup efforts (in tons).
- SW103080 The number of stream miles cleaned.

### **Volunteer Monitoring**

- SW103100 The number of volunteers participating in monitoring programs.
- SW103110 The frequency of monitoring in the watershed (D-Daily, W-Weekly, B-Bimonthly, M-Monthly, Q-Quarterly and A-annually).
- SW103120 The number of volunteer monitoring stations established in the watershed.
- SW103130 The number of volunteer monitoring training sessions held.

**Municipal Separate Stormwater Sewer System (MS4)  
Technical Assistance and/or Compliance Evaluation Checklist**

SW103140 The number of actions that were taken as a result of the monitoring data -collected by volunteers.

**Wetland Plantings**

SW103160 The acres of land planted.

SW103170 The number of volunteers that participated in planting.

SW103180 The number of planting events held.

**MONITORING PROGRAMS**

Describe the Permittee's monitoring program (if any)?

**Municipal Separate Stormwater Sewer System (MS4)  
Technical Assistance and/or Compliance Evaluation Checklist**

**PROGRAMS REVIEWED (CHECK ALL THAT APPLY)**

- Interagency agreements or stormwater partnerships
- Legal authorities (i.e., Stormwater Ordinance, Unified Development Ordinance, Flood damage Protection Ordinance)
- Contract Operations (i.e., Transit Authorities, Pesticide Application, Construction Projects, Street Washing, Maintenance of right-a-ways, GIS Mapping, Monitoring, Stream Restorations, Litter or Solid Waste Pickup, Recycling, Household Waste)
- SWMP Staff and Budget
- Structural Controls and Storm Water Collection System Operation
- Illicit Discharges and Improper Disposal Program
- Street, Road, and Highway Operating Procedures
- Pesticide, Herbicide, and Fertilizer (PHF) Controls
- Spill Prevention and Response Program
- Public Education and Involvement
- Public Reporting
- Development and Redevelopment
- Construction Site Controls
- Wastewater and Water Distribution (Controls Limiting Sanitary Sewer Inflow and Infiltration (I&I))
- Municipal Operations and Industrial Facilities (i.e., Transfer Stations, Fleet Maintenance, Airports, Animal Shelters, Waste Water Treatment Plants, Construction debris sites, Transit Authorities, Public Works, Prisons, Emergency Services, Fire and Police Departments, Landfills, Water Plants, Vehicle maintenance and services facilities, Vehicle wash facilities, and lift stations)
- Proper Management and Disposal of Litter, Illegal Sit-Outs, Household Waste, Yard Waste, Used Oil and Toxic Materials
- Monitoring Programs
- Other \_\_\_\_\_

**FIELD INSPECTIONS (CHECK ALL THAT APPLY)**

- Inspection of industrial facilities
- Inspection of municipal operations
- Inspection of construction sites
- Inspection of structural BMPs

**RECORDS EVALUATED (CHECK ALL THAT APPLY)**

**Structural Controls and Stormwater Collection System Operation**

- Inventory of structural controls
- Map of structural controls
- Maintenance schedule for structural controls
- Structural controls maintenance records documentation

**Areas of New Development and Redevelopment**

- Standard Operating Procedure (SOP) or description of review process
- Documentation of plan review

**Pesticide, Herbicide and Fertilizer (PHF) Application**

- Pesticide, Herbicide and Fertilizer Application Plan or Standard Operating Procedures
- Records of employee safety training in use, storage, and disposal of PHFs
- Pesticide Application Certification for Employees
- Educational materials

# **Municipal Separate Stormwater Sewer System (MS4) Technical Assistance and/or Compliance Evaluation Checklist**

## **Spill Prevention, Containment and Response**

- Spill incidents reporting sheets/logs
- Spill response procedures

## **Roadways**

- Maintenance schedule for street improvements, street sweeping, and street maintenance.
- Criteria for prioritizing maintenance needs
- Roadway maintenance records documentation

## **Illicit Discharge, Detection, and Elimination (IDDE) Program**

- Storm water ordinance covering illicit discharge detection and discharge elimination program
- SOPs for illicit discharge screening
- Completed outfall screening checklists

## **Municipal Operations**

- Inventory of Municipal Operations
- Inspection procedures/checklist for Municipal Operations
- Inspection frequency/schedule
- Inspection records
- Staff training plan
- Staff training records

## **Public Education**

- Materials used for public education activities

## **Construction Site Controls**

- Structural and non-structural Best Management Practices (BMPs) requirements
- Criteria for BMP selection
- Inspection procedures for construction sites
- Inspection frequency/schedule
- Inspection records
- Staff training plan and records
- Enforcement process/plan
- Education and training plan for construction site operators
- Records of construction site training

## **Other Records reviewed**

- Permit
- Annual Report
- Budget
- Interagency Agreements or Partnerships and or MOU
- Illicit Discharge Detection & Elimination Ordinance
- Erosion & Sediment Control Ordinance
- Post-Development Stormwater Management Ordinance
- Stormwater Ordinance
- Unified Development Ordinance
- Flood Damage Protection Ordinance
- Other (describe)

**Municipal Separate Stormwater Sewer System (MS4)  
Technical Assistance and/or Compliance Evaluation Checklist**

**INTERVIEWS**

For each interview note the date and contact information including name and title, program, phone number and e-mail address.

**Municipal Separate Stormwater Sewer System (MS4)  
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**INTERVIEWS (CONTINUED)**

For each interview note the date and contact information including name and title, program, phone number and e-mail address.

# **Municipal Separate Stormwater Sewer System (MS4) Technical Assistance and/or Compliance Evaluation Checklist**

## **COMMON DEFICIENCIES NOTED IN PREVIOUS COMPLIANCE EVALUATIONS**

Coverage under the general permit, NCG08, is applicable to all owners or operators of stormwater point source discharges associated with activities that have vehicle maintenance areas, including fueling, associated with activities classified Local and Suburban Transit and Interurban Highway Passenger Transportation. At the time of the inspection, the state had not issued a certificate of coverage.

The staff is currently evaluating their BMP manual to ensure the manual meets or exceeds the 2007 State BMP manual.

One of the objectives for public involvement and participation program is to provide opportunities for the public, including major economic and ethnic groups, to participate in program development and implementation. During the compliance evaluation it was not clear if the Stormwater Services Division had effectively utilized citizen advisory committees for stormwater related programs. Other than the citizens survey, efforts were directed at reacting to citizen's complaints or concerns rather than actively soliciting public involvement and participation.

One of few opportunities the Permittee has to review the training material is during the pre-construction meeting. We recommend the Permittee develop a standard agenda for pre-construction meetings which in addition to a review of the plans, schedules, includes a discussion of procedures for public input, sanctions to ensure compliance, requirements for construction site operators to implement appropriate erosion and sediment control practices, procedures for site inspection and enforcement of control measures, and requirements for 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 impacts to water quality.

It is the Permittee's responsibility to ensure that any municipal operations that require an NPDES permit maintain and implement an ongoing Stormwater Pollution Prevention Plan (SPPP) specific to that facility. SPPPs include as a minimum, the following:

- Site plan.
- Stormwater management plan.
- Spill prevention and response plan.
- Preventive maintenance plan and good housekeeping plan.
- Training schedule.

Municipalities are required to review their regulated industrial facilities for compliance with the SPPP on an annual basis. Putting this measure in the Phase II permit underscores the existing requirement. It is the Permittee's responsibility to:

- Find out if your local government owns or operates any regulated industrial facilities,
- Locate the permit and the SPPP,
- Review the SPPP to make sure it is still up to date,
- Help ensure that the staff responsible for the facility are fully implementing the SPPP

We suggest that the municipal pollution prevention / good housekeeping program for non-individually permitted facilities be divided into the following steps:

1. Inventory all of the Facilities
2. Visit Each Site
3. Conduct staff training specific for pollution prevention and good housekeeping procedures

## **Municipal Separate Stormwater Sewer System (MS4) Technical Assistance and/or Compliance Evaluation Checklist**

All spills and SSO's reaching storm drains or surface waters should be reported to the town's stormwater section. The town must develop a process to ensure copies of spills and resolution, follow up reports and prevention education and enforcement documentation are available for review.

The Permittee must ensure all land disturbing activities, including municipal construction and maintenance projects that disturb less than an acre that have a potential to impact water quality, are documented under work orders. Denuded areas, erosion control for the site, and stabilization of the site will be documented.