

# COMPREHENSIVE STORMWATER MANAGEMENT PROGRAM

## FOR THE CITY OF MEBANE

### FEBRUARY 14, 2003

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**DEFINITIONS**

NPDES – National Pollutant Discharge Elimination System

MS4 – Municipal Separate Storm Sewer System

BMP – Best Management Practice

TMDL – Total Maximum Daily Load

Illicit Discharge – Any discharge to an MS4 that is not composed entirely of stormwater.

Exceptions include discharges from NPDES-permitted industrial sources and discharges from fire-fighting activities.

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**7 STORMWATER MANAGEMENT PROGRAM**

**7.1 PUBLIC EDUCATION AND OUTREACH ON STORM WATER IMPACTS**

**7.1.1 BMP Summary Table**

BMP Measurable Goals

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**Responsible Position/Party**

Prepare an education plan Prepare education plan in the first 6 months of the permit. Include in Plan the BMPs, schedule, targeted audiences, and measurable goals. Summarize plan and implementation progress in each annual report.

X City Planning Director  
City Engineer

School Programs Develop school children education program in Year one and implement. Focus on basic messages regarding clean water and the things they can do at home to help. Track the number of children reached and the subject covered and report annually

X City Planning Director  
City Engineer

Mailers, brochures, posters Develop bilingual mailer for insert in utility bills. Develop bilingual brochures and poster for distribution at City Hall, and public library, and implement in Year one. Target homeowners and businesses with messages about how they can reduce pollution picked up by stormwater. Track number of homes and businesses reached by mailers and report annually.

X City Planning Director  
City Engineer

Use of Public/Gov't Cable TV and City's web page Develop public service messages in Year two. Target message about the importance of clean water and how stormwater gets dirty. Give tips on reducing pollution. Identify target audience and track the number of times shown; report annually.

X City Planning Director  
City Engineer

Festivals, parades, local fairs Participate in City Festivals & events annually by providing a stormwater information booth starting in Year two and report annually on event and message provided. Provide bilingual messages on the importance of clean water and on specific activities that can be carried out to help keep stormwater clean.

X X X X Arts Community Center Director  
City Engineer

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**7.1.1 BMP Summary Table (cont'd)**

**BMP Measurable Goals**

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**Responsible Position/Party**

Business and Industry education and outreach Develop program for educating business and industry using industry using brochures or pamphlets, beginning in Year two and report annually on number of businesses reached and number of employees educated. Focus on workplace issues to reduce pollutant loading. Target hot spot businesses.

X City Planning Director  
City Engineer  
Participate and promote Big Sweep  
and Stream Clean statewide programs  
Promote Big Sweep and Stream Clean programs and  
track activities within community beginning in Year two.  
Focus on cleaning up the streams and other receiving  
waters. Report annually on activities within your  
community such as number of participants and amount  
of waste collected.

X City Planning Director  
City Engineer  
Public service announcements  
through radio ads,  
Use local radio station to have them develop audio  
spots to be used in Public Service spots, beginning in  
Year three and report on number of spots developed,  
targeted audience and message, number of radio  
stations involved and frequency of message airing.

X City Planning Director  
City Engineer

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### **7.1.2 Target Audience**

City of Mebane residents, school children, local businesses (including gas station owners) and industry, will be targeted because these groups have the most impact on stormwater pollution prevention.

### **7.1.3 Target Pollutant Sources**

The education program will target total suspended solids, floatables, trash, and debris.

The education program will also address the proper use and disposal of typical household chemicals, garden chemicals, and used motor oil.

### **7.1.4 Outreach Program**

School programs, printed materials to be distributed via mail and public events, public television and radio, and participation in state cleanup programs will be used to reach

the target audience. By using these methods, the education program will be expected

to reach all residents of Mebane, as well as those that do business here, over the course of the five year permit period.

As a result of this outreach program, the target audience will be informed of the importance of reducing storm water pollution, ways they can incorporate pollution reduction in their daily lives, and opportunities for individual or group involvement as

part of a city-sponsored committee, citizen volunteer group, youth service group, or

state stormwater program.

### **7.1.5 Decision Process**

The formation of the storm water public education and outreach program was based on

the mechanisms currently in place, and their means and effectiveness of

communicating and educating the public about the issues of stormwater pollution prevention. Each of the eight BMP's selected were judged to be an effective and economical tool for educating the general public and/or specific groups within the community, with a specific measurable goal with which to gauge its effectiveness.

### **7.1.6 Evaluation**

The education and outreach program will be evaluated based on how each individual

BMP is meeting its measurable goal at the end of each reporting period.

Changes will

be considered for any BMPs that are not meeting the measurable goals

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## **7.2 PUBLIC INVOLVEMENT AND PARTICIPATION**

### **7.2.1 BMP Summary Table**

#### **BMP Measurable Goals**

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#### **Responsible Position/Party**

Public hearing on the development of the application for the stormwater permit.

A copy of the notice of public hearing will be submitted with the application with the date and time of each meeting noted.

**X** City Planning Director

Storm Drain Stenciling A citizen's group will be formed in Year two whose purpose will be to label storm drain inlets with painted messages or graphics warning citizens not to dump pollutants into the drains. All storm drain inlets will be labeled by the end of year five. The number of storm drains labeled will be reported annually.

**X X X X** Arts Community Center Director

Public Works Director

Adopt-A-Stream Programs. This program will allow volunteer groups or organizations to "adopt" a stream or creek to study, clean up, monitor, protect, or restore. This may be done in conjunction with the Big Sweep and Stream Clean programs described in Section 7.1.

The program will be available for interested groups by the end of year 2. The number of adopting groups, the stream or creek they adopt and its length, and the amount of debris removed will be reported annually.

**X** Arts Community Center Director

Public Works Director

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### **7.2.2 Target Audience**

The public hearing for the development of the permit application and stormwater management program, will target all interested and affected members of the Mebane community.

### **7.2.3 Participation Program**

The public has been involved in the development of the stormwater permit and management program through a public hearing. A copy of the public notice has been

included as Appendix A. Public participation opportunities will be implemented throughout the life of the permit and will include the following:

#### **7.2.3.1 Storm Drain Stenciling**

A citizen's group will be formed whose purpose will be to label storm drain inlets with painted messages or graphics warning citizens not to dump pollutants into the drains.

#### **7.2.3.2 Adopt-A-Stream program**

An Adopt-A-Stream program will be organized to allow volunteer groups or organizations to "adopt" a stream or creek to study, clean up, monitor, protect, or restore.

### **7.2.4 Decision Process**

A public hearing is necessary for public participation and input.

### **7.2.5 Evaluation**

The Public Involvement and Participation program will be evaluated based on how each individual BMP is meeting its measurable goal at the end of each reporting period.

Changes will be considered for any BMPs that are not meeting the measurable goals.

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

### **7.3.1 BMP Summary Table**

#### **BMP Measurable Goals**

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#### **Responsible Position/Party**

Develop ordinance/amend existing ordinance to include illicit detection, right of entry, prohibition of certain discharges, enforcement actions and penalties for dumping, spills, and willful illicit connections.

Develop ordinance within first year, have ordinance adopted by elected officials by end of year one. Note date of adoption and have copy of ordinance in annual report file and posted on the City's web page.

X City Planning Director  
City Attorney  
City Engineer

Develop storm sewer system map for the remaining 50% that is unmapped, showing outfalls and the receiving body of water. Complete one-quarter of the entire MS4 each year, updating any system changes within already mapped areas as they occur.

Prepare remaining system map beginning in first year in support of inspection program and completing in year three. The map will note outfalls and receiving bodies of water for each outfall. Report annually on progress.

X X X Public Works  
City Engineer

Establish an inspection and elimination program within the community. Have program in place in year two.

Define areas of the community that will be inspected for illicit connections and show on a map the progress made year by year, completing one quarter of the community, geographically measured in square miles, each year. Finish inspection program by end of year five, beginning implementation in year two. Maintain records of the areas screened. Summarize in annual report.

X X X X City Public Works Director  
City Engineer

Develop fact sheets for public education program on illicit connections and spill management. Place in City Hall and provide to Fire Department for distribution to industry.

Prepare three fact sheets and distribute copies to City Hall and Fire Department for public distribution.

Complete by end of year two and provide samples in annual report. Note date completed and number of copies placed for distribution.

X City Planning Director  
City Public Works Director  
City Engineer

Coordinate with local health department on failing septic systems, locating problem areas in the system map.

Provide public information on septic system management.

Provide a fact sheet on septic system management, Note date of distribution and number of copies placed. Complete by end of year two and update in year five.

X X City Public Works Director  
City Engineer

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### 7.3.1 BMP Summary Table (cont'd)

#### BMP Measurable Goals

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**Responsible Position/Party**

Train employees on how to inspect for and report illicit connections and establish a tracking system for managing reported problem areas.

Provide materials to all public employees in illicit connections and how to recognize one. Complete by end of year one and note date distributed. Summarize in annual report.

X City Public Works Director

City Engineer

Develop a check list to be located near all public works telephones for recording any illicit connections or illegal discharges reported by the public.

Create and implement checklist in year two. Provide sample in report.

X City Public Works Director

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**7.3.2 Storm Sewer System Map**

Currently almost 50% of the storm sewer system is mapped, and the remaining 50% will

be mapped and field verified during the course of normal maintenance operations by the

public works department. The route of the system, locations of pipes, drainage ditches,

and outfalls will verified and added to a digital drawing. At some point in the future, this

information is expected to be added to Mebane's GIS database. The map will be updated as needed during subsequent maintenance operations.

**7.3.3 Regulatory Mechanism**

Amend the existing stormwater ordinance to include illicit detection, right of entry, and

prohibition of certain non-stormwater discharges.

**7.3.4 Enforcement:**

There will be provisions in the amended ordinance for enforcement actions and penalties for dumping, spills, and willful illicit connection.

**7.3.5 Detection and Elimination**

After the field screening is complete, The City will take measures to identify and remove

illegal discharges. Identifying illegal discharges may require a combination of office and

field work. After the field screening, staff will consult the jurisdiction-wide information

they have compiled to obtain information about the land uses, infrastructure, industries,

potential sources and types of pollution that may exist in the drainage area of the outfall.

After priority areas have been identified in the office, a systematic field investigation will be planned that minimizes the amount of resources required to identify the source. The following field methods may be used to identify and trace the source of illegal discharges:

- Site Investigation
- Dry weather flow observations
- Smoke Testing
- Television Inspection

The right of entry established in the amended ordinance will provide access for inspection if the origin of the discharge is in doubt. Once an illegal discharge is located and confirmed through field screening, staff will notify the responsible party verbally if possible and follow-up with written notification. If the responsible party does not comply with the removal schedule provided by the City, or receive approval for a revised schedule, the City will take enforcement action and the connection will be removed at the responsible party's expense.

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### **7.3.6 Non Stormwater Discharges**

Currently there are no known non-stormwater discharges that are a significant contributor to the MS4. If any are identified in the future, they will be addressed at that time.

### **7.3.7 Outreach**

City employees will be informed of the hazards associated with illegal discharges and improper disposal of waste as part of their general training requirements. These will be addressed in the Pollution Prevention/Good Housekeeping section of this plan, and will include training in hazardous material handling and disposal, as well as notices and signs posted in the appropriate areas.

The general public will be educated through the BMP's listed in the Public Education section of this plan. These educational BMP's will include brochures, public service announcements, a phone number for reporting illegal discharges, and business education and outreach programs.

### **7.3.8 Decision Process**

The formation of the storm water Illicit Discharge Detection and Elimination program

was based primarily on regulatory mechanisms. The regulatory, educational, procedural BMP's selected were judged to be an effective means of detecting and eliminating illicit discharges.

### **7.3.9 Evaluation**

The effectiveness of the program will be gauged by the total number of illicit connections detected and removed each year. If the total number remains constant, or increases, changes will be made to the public education program and/or The City ordinance to allow for greater enforcement and penalties.

### **7.4 CONSTRUCTION SITE STORMWATER RUNOFF CONTROL**

To meet the construction site stormwater runoff control requirement, the City of Mebane will rely on the North Carolina State Erosion and Sediment Control Program and the Department of Water Quality's general stormwater permit program for construction activities that occur in the Alamance County portion of the City's jurisdiction. The City of Mebane will rely on Orange County's erosion control program for construction activity in the Orange County portion of the city.

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### **7.5 POST-CONSTRUCTION STORM WATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT**

#### **7.5.1 BMP Summary Table**

##### **BMP Measurable Goals**

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##### **Responsible Position/Party**

Amend existing Land Usage ordinance to create High and Low density project development post construction stormwater management program. This ordinance will also include enforcement mechanisms that will provide the legal authority to act, procedures to follow, and appropriate actions in the event of non-compliance. Initiate the development of post construction stormwater management program in Year one and implement by January 1, 2005. Report annually on progress made, addressing plan review process, number of sites impacted, inspection practices, and any follow up procedures implemented. In first report, document procedures followed in adopting program, including any input from the stakeholder communities.

**X X** City Planning Director

City Attorney

City Engineer

Develop standards and policies that ensure structural BMPs will be in conformance with the state's Stormwater Management Design Manual

Report annually on progress made, addressing plan review process, number of sites impacted, inspection practices, and any follow up procedures implemented. In first report, document procedures followed in adopting program, including any input from the stakeholder communities.

**X X X** City Engineer

Develop a best management practice for reducing nutrient loading and a nutrient application management program.

Initiate the development of BMP for reducing nutrient loading and application program in Year two and implement in Year three. Report annually on progress made.

**X X** City Engineer

Establish maintenance standards and inspection program to ensure that on-site controls continue to function as designed.

Initiate the development of maintenance and inspection standards in Year two and implement in Year four. Report annually on progress made, addressing number of sites impacted, inspection practices, and any follow up procedures implemented. In first report, document procedures followed in adopting program, including any input from the stakeholder communities.

**X X X** City Engineer

Develop education programs for developers and the public about project designs that minimize water quality impacts, minimization of the percentage of impervious area after development, use of measures to minimize directly connected impervious areas, and source control

Initiate the development of education program in Year two and implement in Year three. Report annually on progress made. In first report, document procedures followed in adopting program, including any input from the stakeholder communities.

**X X** City Planning Director

City Engineer

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measures.

### 7.5.1 BMP Summary Table (cont'd)

#### **BMP Measurable Goals**

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**Responsible Position/Party**

Coordinate with the county health department on developing and implementing an oversight program to minimize the potential for fecal coliform contamination by ensuring proper operation and maintenance of on-site wastewater treatment systems (including septic systems). This will be in done in conjunction with providing public information on septic system management in Section 7.3.

Initiate the development of oversight program in Year two and implement in Year three. Report annually on progress made.

**X X** City Engineer

Public Works Director

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**7.5.2 Stormwater Management Options**

The existing land usage ordinance will be amended to include a post-construction

stormwater runoff management program for new development and redevelopment

projects that disturb greater than, or equal to, one acre. This includes projects of less

than one acre that are a part of a larger common plan of development or sale that

discharges into the MS4. All such projects shall be required to apply for locally issued

construction permit coverage under one of the following stormwater management options:

**7.5.2.1 Low Density Projects**

Projects shall be permitted as low density if the project meets the following:

(I) No more than 2 dwelling units per acre or 24 percent built-upon area (BUA) for all residential and non-residential development;

(II) Stormwater runoff from the development shall be transported from the development by vegetated conveyances to the maximum extent practicable:

(III) All BUA shall be at a minimum of 30 feet landward of all perennial and intermittent surface waters. For the purpose of this Rule, a surface water shall be present if the feature is approximately shown on either the most recent version of the soil survey map prepared by the Natural Resources Conservation Service of the United States Department of Agriculture or the most recent version of the 1:24,000 scale (7.5 minute) quadrangle

topographic maps prepared by the United States Geologic

Survey (USGS). An exception to this requirement may be allowed when surface waters are not present in accordance with the provisions of 15A NCAC 2B .0233 (3)(a); and

(IV) The permit shall require recorded deed restrictions and

protective covenants to ensure that development activities maintain the development consistent with the approved project plans.

#### 7.5.2.2 High Density Projects

Projects exceeding the low density threshold (established above in low density section) shall implement stormwater control measures that:

(I) Control and treat the difference in stormwater runoff volume leaving the project site between the pre and post development conditions for the 1 year 24 hour storm. Runoff volume

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drawdown time shall be a minimum of 24 hours, but not more than 120 hours;

(II) All structural stormwater treatment systems used to meet the requirements of the program shall be designed to have an 85% average annual removal for Total Suspended Solids:

(III) General Engineering Design Criteria for all projects shall be in accordance with 15A NCAC 2H .1008(c);

(IV) All BUA shall be at a minimum of 30 feet landward of all perennial and intermittent surface waters. For the purpose of this Rule, a surface water shall be present if the feature is approximately shown on either the most recent version of the soil survey map prepared by the Natural Resources Conservation Service of the United States Department of Agriculture or the most recent version of the 1:24,000 scale (7.5 minute) quadrangle topographic maps prepared by the United States Geologic Survey (USGS). An exception to this requirement may be allowed when surface waters are not present in accordance with the provisions of 15A NCAC 2B .0233 (3)(a); and

(V) The permit shall require recorded deed restrictions and protective covenants to ensure that development activities maintain the development consistent with the approved project plans;

#### **7.5.3 Non-Structural BMP's**

The receiving streams in The City's watershed are classified as Nutrient Sensitive

Waters; therefore the amended ordinance shall also ensure that the best management

practice for reducing nutrient loading is implemented. In addition, a nutrient application

(both inorganic fertilizer and organic nutrients) management program shall be developed and included in the stormwater management program.

#### **7.5.4 Structural BMPs**

Standards and policies will be developed that ensure structural BMPs will be in conformance with the state's Stormwater Management Design Manual.

#### **7.5.5 Regulatory Mechanism**

In the first year, The City will assess existing ordinances, policies, programs and studies

that address storm water runoff quality. In addition to assessing these existing documents and programs, The City will provide opportunities to the public to participate in the development of the program. The existing land usage ordinance will then be amended to include a post-construction stormwater runoff management program for new development and redevelopment. This ordinance will also include enforcement

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mechanisms that will provide the legal authority to act, procedures to follow, and appropriate actions in the event of non-compliance.

#### **7.5.6 Operation and Maintenance**

The existing land usage ordinance will be amended to address the long-term operation and maintenance of post-construction controls. The amended ordinance will include guidelines for delegating routine and non-routine maintenance responsibilities to ensure access for inspections, and providing a mechanism for enforcement.

#### **7.5.7 Decision Process**

The post construction stormwater management program shall ensure that controls are in place that will prevent or minimize water quality impacts from new development and redevelopment projects. These controls should include an amended ordinance to address post-construction runoff control from new development and redevelopment projects and ensure adequate long-term operation and maintenance of BMPs.

#### **7.5.8 Evaluation**

The post construction site management for new and re-development activities program will be evaluated based on how each individual BMP is meeting its measurable goal at the end of each reporting period. Changes will be considered for any BMPs that are not meeting the measurable goals.

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

#### **7.6.1 BMP Summary Table**

**BMP Measurable Goals**

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**Responsible Position/Party**

Complete environmental audits of all identified facilities and prioritize recommendations for addressing potential pollution prevention activities. After completing site environmental audits, annually inspect all municipal facilities to identify potential for polluting stormwater.

In Year one begin environmental audits at priority sites and complete all audits by Year two. Prioritize recommendations, as each audit is completed and initiate recommendations in the fiscal year following the audit, except where any extreme hazard or potential human risk is identified. High hazards will be addressed immediately upon identification. Report annually on progress toward meeting recommendations. Objective is to reduce pollutant loading from municipal sites.

**X X** Public Works Director  
City Engineer

Develop training materials on pollution prevention for public facilities, using existing materials gathered from other organizations or creating new tools as needed. Educate all employees annually on the need for controls to protect stormwater from exposure to potential pollutants.

Begin in Year one to educate all employees on clean water issues and on workplace responsibilities to reduce or eliminate pollutants from stormwater.

Maintain program annually and report on number of employees trained and subjects covered.

**X X X X X** City Public Works Director  
City Engineer

Provide training for those employees that maintain the drainage system with the focus on disposal of floatables, grit, sediment, and other pollutants removed from the system.

Beginning in Year one provide training to all employees who maintain the drainage system with a focus on floatable, grit, sediment, and disposal of pollutants removed from the drainage system. Report annually on number of employees trained and subjects covered.

**X** City Public Works Director  
City Engineer

Provide training to employees that manage and apply chemicals for control of dust, pests, vermin, and weeds and/or are used to enhance the growth or condition of public urban landscape and recreation facilities. Training will target the safe and effective application, storage and disposal of chemicals used.

Beginning in Year one, provide training to all employees who manage and apply chemicals to address safe storage, application and disposal of

residual chemicals. Repeat training annually throughout the permit. Report on number of employees trained and subjects covered.

City Public Works Director

City Engineer

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### 7.6.1 BMP Summary Table (cont'd)

#### **BMP Measurable Goals**

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#### **Responsible Position/Party**

Annually inspect vehicle washing and fueling operations to ensure that they are in good working order and that they minimize exposure of stormwater to chemicals, fuels, and other liquids.

Begin annual inspection in Year one and document findings and actions taken to address any problems identified. Report on finding in annual permit report.

City Public Works Director

City Engineer

Apply for an Industrial NPDES General Stormwater permit for maintenance and wastewater treatment plant.

Apply for permit in year one. Report on date permit application was submitted and permit issued.

City Public Works Director

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### **7.6.2 Affected Operations**

The City of Mebane operates a vehicle maintenance yard, a wastewater treatment plant, and a municipal building that serves as a city hall and police station. The City of

Mebane has submitted a Notice Of Intent (NOI) for coverage under NPDES General

Permit NCG110000 for stormwater discharges from the wastewater treatment plan. A

copy of the NOI is included as Appendix B. Environmental audits of these facilities and

their operations will be performed to prioritize recommendations for addressing potential

stormwater pollution prevention activities.

### **7.6.3 Training**

Training materials will be developed on pollution prevention for public facilities, using

similar materials as will be used in the public outreach program. All employees will be

educated annually on the need for controls to protect stormwater from exposure to potential pollutants. This training will also serve as the training requirement for public employees as specified in the outreach component of the Illicit Discharge section of this program.

All public employees involved in vehicle, open space, or building maintenance operations will be provided training in BMPs, processes and materials they are working with, safety hazards, practices for preventing discharges, and procedures for responding quickly and properly to toxic and hazardous material incidents. This training will be in conjunction with the training requirements of the Spill Prevention, Control, and Countermeasures plan currently in place.

All public employees involved in stormwater drainage system maintenance will be specifically trained in the disposal of floatables, grit, sediment, and other pollutants removed from the system. Additional training, or certification, will be provided to employees that manage and apply chemicals for control of dust, pests, vermin, and weeds and/or to enhance the growth or condition of public urban landscape and recreation facilities. Training will target the safe and effective application, storage and disposal of chemicals used.

#### **7.6.4 Maintenance and Inspections**

A preventive maintenance program will be developed that will include routine inspections of catch basins, storm water detention areas, and water quality treatment systems. A similar program will be implemented for vehicles, equipment, and material storage areas in the maintenance yard. Inspections will ensure all equipment and material storage containers are in good condition. Any problems or issues that may have an impact on stormwater quality will be noted and corrective action taken. Vehicle washing and fueling operations will be inspected annually to ensure that they are in good working order and that they minimize exposure of stormwater to chemicals, fuels, and other liquids. Schedules and procedures will be established for the inspections, and an organized record-keeping system will be implemented to schedule and document inspections.

### **7.6.5 Vehicular Operations**

All vehicles, equipment, and associated material are stored in covered facilities.

Water

from the vehicle and equipment washing operation is treated by an oil/water separator

before discharge to the sanitary sewer. The City also uses vacuum street sweepers to

regularly clean city roads and parking lots. The collected debris is added to the yard

waste compost at the maintenance facility.

### **7.6.6 Waste Disposal**

Debris and floatables collected from the MS4 are temporarily stored in an uncovered

area at the maintenance facility before transfer to the landfill. The City of Mebane performs its own garbage, yard waste, and heavy trash collection. Recyclables

collection is contracted out to a private company. Used oil from vehicle and equipment

maintenance operations is stored onsite and periodically collected by a certified oil

recycler.

### **7.6.7 Flood Management Projects**

Future flood management projects will be reviewed from a water quality standpoint.

### **7.6.8 Existing ordinances**

No ordinances exist which specifically address illicit discharges, post construction stormwater runoff control, or discharges to nutrient sensitive waters.

### **7.6.9 Other Evaluations**

There are no other aspects of the municipal operation that have been previously evaluated.

### **7.6.10 Decision Process**

The most effective and practical BMPs for minimizing stormwater pollution were selected for this program.

### **7.6.11 Evaluation**

The pollution prevention/good housekeeping for municipal operations program will be

evaluated based on how each individual BMP is meeting its measurable goal at the end

of each reporting period. Changes will be considered for any BMPs that are not meeting the measurable goals