



TOWN OF CARRBORO

NORTH CAROLINA

TRANSMITTAL: STORMWATER UTILITY

DELIVERED VIA: ☐ HAND ☐ MAIL ☐ FAX ☒ EMAIL

To: Town Council
From: Randy Dodd, Stormwater Utility Manager
Cc: David Andrews, Town Manager
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Heather Holley, Stormwater Specialist
Emily Cochran, Stormwater Administrator
Date: November 6th, 2020
Subject: NPDES Permit Audit Results

Summary

The purpose of this memo is to provide the Town Council with a very brief summary of the Town's NPDES stormwater permit audit to supplement other information provided.

Information

The Town's NPDES permit requires implementation of a comprehensive stormwater management program to reduce pollutants in stormwater runoff based upon six Minimum Control Measures (MCMs): Public Education & Outreach; Public Involvement & Participation; Illicit Discharge Detection & Elimination; Construction Site Runoff Controls; Post-Construction Site Runoff Controls; Pollution Prevention & Good Housekeeping for Municipal Operations. NCDEQ staff have completed an audit and provided the Town with written notification of the audit results. The audit process involved: requesting information prior to the audit; a half day remote audit on August 12 (AM) followed by site visits to the Town's Public Works facility and two field site sites to observe Town staff inspections of a stormwater outfall and Stormwater Control Measure (PM); and follow up requests for information. The remote audit scope involved NCDEQ details for overall program administration and three of the MCMs (Illicit Discharge, Pollution Prevention, and Post Construction.) Table 1 provides a summary of the NCDEQ findings for these program components. The violations requiring improved performance are primarily related to the Illicit Discharge and Pollution Prevention MCMs, and mostly involved insufficient documentation and recordkeeping. Staff performed a self-assessment using the same template. While staff concur with a majority of the findings, there were several discrepancies between NCDEQ and staff's own self-assessment. Staff will be further reviewing and documenting as part of written response to the audit report, and will also be sharing the audit results with the Stormwater Advisory Commission and asking the SWAC to review the draft new Stormwater Management Plan required as part of permit renewal.

Table 1. Summary of NCDEQ Audit Findings

<u>Audit Component</u>	<u># Questions</u>	<u># Inadequate Responses</u>	<u># Partially Inadequate Responses</u>
Program Administration	30	2 (7%)	3 (10%)
Illicit Discharge Detection and Elimination	20	7 (35%)	2 (10%)
Pollution Prevention and Good Housekeeping	21	3 (14%)	3 (14%)
Post Construction Stormwater Runoff	<u>36</u>	<u>0</u>	<u>0</u>
Total	107	12 (11%)	8 (7%)

Recommendation

It is recommended that the Town Council receive this information.