

# NPDES Stormwater MS4 Permit Annual Report

October 1, 2020 - September 30, 2021

Permit No. NCS000245 To discharge stormwater under the National Pollutant Discharge Elimination System Prepared by S. Wayne Miles, PE, Stormwater Program Manager





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## **Summary**

This report describes programs and activities undertaken during the period of October 1, 2020 through September 30, 2021 as required by the City of Raleigh's permit to discharge stormwater under the National Pollutant Discharge Elimination System (NPDES), NPDES Stormwater MS4 Permit no. NCS000245.

S. Wayne Miles, PE Stormwater Program Manager City of Raleigh





## Section A: Program Implementation

The City of Raleigh implements, manages, and oversees all aspects of its Stormwater Management Plan to control to the maximum extent practical the discharge of pollutants from its municipal storm sewer system associated with stormwater runoff and illicit discharges, including spills and illegal dumping.

Program Element	Annual reporting Metric(s)	2020-2021
Part II Section A.1 The permittee will maintain adequate legal mechanism, such as regulations, ordinances, policies, and procedures to implement all provisions of the SWMP.	Report modifications to the regulations, ordinances, policies, and procedures	The City's Education and Outreach Plan and Water Quality Assessment and Monitoring Plan have been updated and changes have been implemented during this reporting year.
Part II Section A.2 The permittee will implement provisions of the SWMP and evaluate performance and effectiveness of the program components.	N/A, annual reporting of program effectiveness is described in Section 13 of the SWMP	N/A
Part II Section A.3 The permittee is required to keep the SWMP up to date with annual updates if any changes are warranted.	Report modifications to the SWMP and make available to the Division upon request	SWMP was updated during this reporting period, submitted to NDEQ on March 17, 2021 and was deemed approved on June 15, 2021.
Part II Section A.4 The permittee shall maintain, and make available to the Division upon request, written procedures for implementing the six minimum control measures. Written procedures shall identify specific action steps, schedules, resources, and responsibilities for implementing the six minimum measures.	Written procedures are available to DEQ upon request	N/A

#### Section B: Public Education and Outreach

#### **B.1 Program Narrative**

The City provides an assortment of tools for reaching out to and educating the public including utility bill inserts, newsletters, webpages, articles, social media, presentations at workshops, classroom education, and TV and radio campaigns. In addition to providing videos and website and printed materials, CWEP produces a large multi-media campaign including television public service announcements, radio public service announcements, and a stormwater informational website, www.nc-cleanwater.org. The CWEP annual report for this reporting period is submitted directly to NC DEMLR by the Triangle J Council of Governments on behalf of the City.



## **B.2 Best Management Practices**

Permit Reference/BMP	Annual reporting Metric(s)	2020-2021
Part II Section B.2 (a) Describe target pollutants and sources	Report target pollutants and the associated sources Report reason each target pollutant was chosen	See Table B-1
Part II Section B.2 (b) Describe target audiences	Report target audiences likely to have significant storm water impacts	See Table B-1
	Report reason each target audience was selected	See Table B-1
Part II Section B.2 (c) Informational website	Report number of hits to stormwater website	44,500 page views for all Stormwater Management webpages; 374 page views for the SWMP webpage. (Data for 10/1/2020 – 8/31/2021 only; totals unavailable for September 2021 at time of reporting
Part II Section B.2 (d) Distribute public education materials to identified user groups	Report number of educational materials distributed by type	See Table B-2
Part II Section B.2 (e) Promote and maintain hotline(s) or helpline(s)	Report number of calls handled by helpline by type of call	Total calls: 1,214 Drainage: 357 Utility fee: 175 Plan review: 335 Volunteer: 37 Illicit discharge: 99 Active construction: 174 Capital projects: 12 Utility billing: 25 Total emails: 358
Part II Section B.2 (f) Implement a public education	Report City events and number of handouts distributed at each event	See Table B-2
and outreach program	Report City's in-school events and number of participants	See Table B-3

Table B-1 Target pollutants, associated sources, target audiences and justification

Target Pollutant	Target Pollutant Justification	Pollutant Sources	Target Audiences	Target Audiences Justification
Sediment	Increases MS4 maintenance, degrades stream and lake biological abundance and diversity, reduces lake depth and storage volume, aesthetically unattractive	Illicit discharge, construction sites, streambank erosion (resulting from increasing impervious in the watershed)	Construction contractors, developers, municipal government, property owners/residents, general public	Audiences conduct, oversee, regulate, and/or engage in and/or observe activities at pollutant sources



Target Pollutant	Target Pollutant Justification	Pollutant Sources	Target Audiences	Target Audiences Justification
Nutrients (nitrogen and phosphorus)	Promotes growth of algae in lakes and streams which can degrade biological abundance and diversity, toxic to aquatic species and humans, impede recreation, aesthetically unattractive	Illicit discharge, sewage overflows and leaks, clippings and waste from landscape maintenance/lawn care, pet animal waste, application and improper storage of fertilizers, atmospheric fallout	Landscape maintenance/lawn care companies, property owners/residents, municipal government, general public	Audiences store and apply fertilizer, own or maintain sewer plumbing/pipes, engage in and/or observe activities at pollutant sources
Trash	Increases MS4 maintenance, aesthetically unattractive	Illicit discharge, construction sites, litter, dumping, restaurants, food trucks	Construction contractors, property owners/residents, restaurant and food truck owners/operators, general public	Audiences generate and store trash or engage in and/or observe activities at pollutant sources
Metals	Degrades stream and lake biological abundance and diversity	Illicit discharge, vehicle storage and maintenance, construction sites, paints and finishes, material, and chemical storage	Construction contractors, painting contractors, property owners/ residents, vehicle repair shops	Audiences engage in activities that store/handle materials and generate wastes that contain metals and/or observe activities at pollutant sources
Bacteria	Public health, pet health	Illicit discharge, sewage overflows and leaks, failing septic systems	Property owners/residents, municipal government, general public	Property owners/residents responsible for septic systems and private sewer plumbing and connections, municipal government responsible for most sanitary sewers, general public observes activities at pollutant sources
Oil & grease	Degrades stream and lake biological abundance and diversity	Illicit discharge, vehicle storage and maintenance, restaurants, food trucks	Vehicle repair shops, restaurant and food truck owners/operators, municipal government, general public	Audiences conduct, oversee, and/or engage in and/or observe activities at pollutant sources



Table B-2 Education and Outreach event and material distribution log

Date	Description of Activity	Attendees & Materials Count	Education Materials (# each material same as # attendees)
10/01/20	Stormwater Management Advisory Commission Virtual Meeting	44	
10/10/20	Rain Garden/Rain Barrel Workshop	7	Raleigh Rainwater Rewards flyer, CWEP brochure, volunteer programs flyer, general pollution flyer
10/30/20	Longleaf Hotel Cistern Feature Article - Raleigh Magazine Publication	30,000	Article
11/05/20	Stormwater Management Advisory Commission Virtual Meeting	53	
11/09/20	Storm Drain Marking Springstone Subdivision	19	Storm drain markers Illegal discharge general brochure
11/16/20	Proposed Floodplain Regulations Mailing Directly Impacted Property Owners	312	Informational letter
11/16/20	Proposed Floodplain Regulations Mailing Property Owners in Floodplain	4,016	Informational letter
11/17/20	NCYouth Conservation Corp-Mini Stream Workshop/General Stormwater Presentation	12	
11/24/20	Exploris Middle School Virtual Q & A Presentation-Green Stormwater Infrastructure	8	
12/01/21	Social Media Posts for Raleigh Stream gauges and USGS partnership	35,000 impressions	
12/01/20	Stormwater Fee Notification Mailing	9	Stormwater fee brochure
12/03/20	Stormwater Management Advisory Commission Virtual Meeting	56	
12/05/20	Virtual Stream Monitoring Workshop	17	
12/09/20	Illegal Discharge Detection Leaf Education Email Notification	478	Leaf education information
12/17/20	Stormwater Capture it Art Contest Email Campaign	120	Contest flyer promotion
12/22/20	Virtual Floodplain One on One Meeting with Riverbend at Lakeside Homeowners Association Contact	1	
01/07/10	Stormwater Management Advisory Commission Virtual Meeting	49	
01/12/21	Upper Lake at Durant Park/Lake Study Public Meeting #1	25	



Date	Description of Activity	Attendees & Materials Count	Education Materials (# each material same as # attendees)
01/17/21	Stormwater Capture it Art Contest Social Media and Email Campaign	Not known	
01/23/21	Virtual Floodplain Meeting with City of Raleigh Hispanic & Immigration Board	11	
01/26/21	Upper Lake at Durant Park/Lake Study Public Meeting #2	20	
02/01/21	Stormwater Fee Notification Mailing	21	Stormwater fee brochure
02/04/21	Stormwater Management Advisory Commission Virtual Meeting	39	
02/05/21	Water Pollution Wednesday Social Media Campaign	13,800 impressions	
02/08/21	Winter e-Builder Training Sessions	45	
02/09/21	Winter e-Builder Training Sessions	45	
02/10/21	Winter e-Builder Training Sessions	45	
02/11/21	Winter e-Builder Training Sessions	45	
02/12/21	Winter e-Builder Training Sessions	45	
02/18/21	Stormwater Art Contest Facebook Ad Promotion	807 views	Contest promotional ad
02/26/21	Winter Urban Watershed Newsletter	905	Newsletter
03/01/21	Stormwater maintenance behind the scenes	12,700 impressions	Social media
12/20 – 3/21	Stormwater Capture it Art Contest Social Media and Email Campaign	1,748	Social media contest promotion
03/01/21	Stormwater Fee Notification Mailing	7	Stormwater fee brochure
03/04/21	Stormwater Management Advisory Commission Virtual Meeting	40	
04/30/21	Earth Day/Arbor Day Tree Planting Social Media posts and Videos	41	
07/24/21	StoryWalk at Lake Johnson Park All the Way to the Ocean	Not known	
03/11/21	Virtual Stormwater Volunteer Recognition Hidden Rivers Documentary Screening	13	
03/12/21	Sustainable Wildlife & Urban Tree Committee (SWUT) Virtual Meeting	5	
03/13/21	Raleigh Watershed Learning Networkstorm drain marking demo	30	



Date	Description of Activity	Attendees & Materials Count	Education Materials (# each material same as # attendees)
03/20/21	Creek Week/Multi-site Stream Clean Ups Drop-in and Adopt a Stream Groups	133	,
03/20/21	Social Media Posts& Direct Email Creek Week- Stream Cleanups two locations	1,657	
03/26/21	Raleigh Rainwater Rewards Social Media Promotions	1,454	
03/27/21	Rain Garden/Barrel Workshop-In-Person	11	
03/28/21	Raleigh Watershed Learning Network presentation- GSI/Innovation & Funding	15	
04/01/21	Stormwater Fee Notification Mailing	13	Stormwater Fee Brochure
04/01/21	Stormwater Management Advisory Commission Virtual Meeting	40	
04/08/21	Mailing for Proposed Floodplain Regulations - Public Hearing	3,960	Proposed floodplain regulations letter
04/20/21	Virtual Storytime Reading & Presentation- Al Iman School	28	
04/21/21	Virtual Twitter Announcement of the 2021 Capture it! Art Contest winning entries	Not known	
04/22/21	Urban Watersheds Spring Newsletter	846	Quarterly newsletter
04/24/21	Virtual Stream Monitoring Workshop	9	
04/28/21	Garden Club field tour of Raleigh Union Station green roof	10	
05/01/21	Stormwater Fee Notification Mailing	4	Stormwater fee brochure
05/03/21	Post Card Mailing-Western North Ridge Project Virtual Public Meeting	46	Project update postcard
05/05/21	Stream Cleanup, Cary Academy High School	7	
05/06/21	Stormwater Management Advisory Commission Virtual Meeting	40	
05/12/21	Virtual & In-person Presentation 2021 Carolina Climate Resilience Conference on "Nature-based Stormwater Solutions"	40	
05/22/21	Think Clean Raleigh - Trash Pick-up	18	
05/25/21	Virtual Public meeting- Western North Ridge Stormwater Project	14	
06/03/21	Stormwater Management Advisory Commission Virtual Meeting	39	
05/14/21	Water Partnership Education and Outreach- Virtual Presentation	20	



Date	Description of Activity	Attendees & Materials Count	Education Materials (# each material same as # attendees)
05/26/21	Go Ask Mom - Local News On-line Story Walk at Lake Johnson	11,000	
05/26/21	Hurricane Season Staff Interview with Spectrum News	Not known	
05/30/21	Stormwater Fee Notification Mailing	4	Stormwater fee brochure
05/31/21	National Dam Safety Awareness Day- Website Article/Social Media Video	556	
06/21/21	Environmental Justice Summer Camp EnviroScape, Green Stormwater Infrastructure Presentations	9	CWEP brochure
06/21/21	Your Service Connection /Monthly newsletter Mailing - Pool Water Pollution Article	204,051	Public Utilities customer monthly newsletter
06/24/21	NC Youth Conservation Corps -Water Quality Presentation with Stream Flow Activity	8	
07/01/21	Stormwater Management Advisory Commission Virtual Meeting	37	
07/01/21	Stormwater Fee Notification Mailing	8	Stormwater fee brochure
07/06/21	South Raleigh Drainage Studies Public Input Session Postcard Mailing	1,446	Drainage studies information postcard
07/07/21	Girls in Science - mini stormwater stream monitoring presentation and monitoring activities	10	
07/07/21	Floodplain Safety & Benefits of a Healthy Floodplain Videos - Social Media Posts and Story	800 impressions	
07/22/21	NC Conservation Corps Mini Stream Monitoring presentation & monitoring activities	14	
07/01/21	Illegal Discharge Detection Elimination Car Wash Businesses Mailing	208,000	At Your Service utility bill insert
08/05/21	Green Stormwater Infrastructure Virtual Subcommittee Meeting	10	
08/12/21	Rain Garden & Rain Barrel mini- presentation Garden Club	11	Raleigh Rainwater Rewards flyer, CWEP brochure, volunteer programs flyer, general pollution flyer
08/18/21	North Carolina State University Volunteer Fair	50	Stormwater volunteer brochure
08/20/21	Statewide Stakeholders Meeting- Advancing Nature-based Stormwater Strategies to Reduce Flooding and Improve Water Quality in North Carolina	55	



Date	Description of Activity	Attendees & Materials Count	Education Materials (# each material same as # attendees)
08/31/21	Stormwater Fee Notification Mailing	10	Stormwater fee brochure
09/02/21	Stormwater Management Advisory Commission Virtual Meeting	41	
9/6/2021	Mass Mailing New Stormwater Fee/Tier Notification Letter	1,073	
09/08/21	Exploris Middle School EnviroScape Presentations	70	
09/23/21	2021 Annual e-Builder Elevate Conference	Not known	
9/29/2021	SNAP tool Presentation/Training for Staff	16	
9/30/2021	Presentation on incorporating Urban Agriculture & Stormwater	14	
9/30/2021	Stormwater (Billing Notification Letter) Fee Brochures	11	
9/30/2021	Raleigh Rainwater Rewards Consults (10/1/2020 – 9/30/2021)	202	

Table B-3 Education and Outreach school events

Date	# Students Attended	Event Location/Description	Virtual/In-person
11/24/20	6	Exploris Middle School/interview with students on green infrastructure and stormwater	Virtual
03/05/21	300	Wakefield Middle School/EnviroScape demo	Virtual
04/20/21	28	Al Iman School/StoryTime reading	Virtual
09/08/21	70	Exploris Middle School/ EnviroScape demo	In-person

### Section C: Public Involvement and Participation

#### C.1 Program Narrative

The City provides opportunities for public involvement and participation. The City's Stormwater Management Plan is noticed and presented at a public hearing for comment by the public once per permit cycle. As-needed changes to City stormwater regulations also are noticed and presented at public hearings for comment by the public. The annual budget for the Stormwater Management Division is noticed and presented for public comment prior to adoption. As a means of obtaining more regular public input on policy and project related matters, Raleigh City Council established the Stormwater Management Advisory Commission that reviews stormwater management issues and provides guidance and recommendations to City Council. Comments from the public also are received during meetings of this commission.



## C.2 Best Management Practices

Permit		
Reference/BMP	Reporting Metric(s)	2020-2021
Part II Section C.2 (a) Volunteer community involvement program	Report number of participants in each City volunteer opportunity	Adopt a Stream: 393 Storm drain marking: 10 Stream monitoring: 17 Foster a Stream: 195
Part II Section C.2 (b) Establish a mechanism for public involvement	Report meeting dates for meetings of the Stormwater Management Advisory Commission and topics of discussion pertaining to MS4 compliance	October 1, 2020 November 5, 2020 December 3, 2020 (MS4 and Linear Asset Management Study) January 7, 2021 February 4, 2021 March 4, 2021 (Stormwater Program Budget Update and Level of Service Options) April 1, 2021 (Capture It! Stormwater Arts Contest Finalists and Voting) May 6, 2021 (Update on Watershed Master Planning and Community Engagement) June 3, 2021 July 1, 2021 September 2, 2021
Part II Section C.2 (c) Establish hotline(s) or helpline(s)	N/A, see helpline reporting metrics in Part II Section B.2.	N/A
Part II Section C.2 (d) Public	Report webpage link for SWMP	https://raleighnc.gov/SupportPages/stormwater- management-plan
review and comment	Report mechanisms used for public review and comment on the SWMP	The City uses the SWMP website with the Water Quality Manager's contact information and the City's Stormwater hotline phone number and email address to provide citizens a mechanism to comment on the SWMP between updates.
Part II Section C.2 (e) Public notice	If public notice occurred, report mechanism(s) used to advertise public review and comment and public notice period.	Advertising for public notice of the updated SWMP for public review and comment was completed between January 8 – February 5, 2021.  Announcement of the start and end of the SWMP public comment period occurred at the January 7, 2021 and February 4, 2021 Stormwater Management Advisory Commission meetings.  Mechanisms used to advertise this public review and comment period: Website: 169 pages views Email: January 12, 2021 to 3,072 subscribers February 4, 2021 to 3,029 subscribers Social media: Twitter, two posts, 5,736 impressions Facebook, two posts, 257 people reached



## Section D: Illicit Discharge Detection and Elimination

#### **D.1 Program Narrative**

The City's illicit discharge program began in 1995. This program is based on a <u>City ordinance</u> that defines what constitutes an illicit discharge and an illicit connection and provides enforcement protocols.

Illicit discharges and illicit connections are identified through reports from the public, reports from City staff across all departments, dry weather screening observations, and outfall inspections. A team of three staff is assigned to Illicit Discharge Detection and Elimination (IDDE). IDDE preventive measures include educating City staff and the public through various means and direct mailings to businesses, such as landscapers and restaurants, that have a history of illicit discharges. Outreach efforts also include regular updates to website content, social media, utility billing and newsletter inserts, and coordination with Wake County and professional associations to distribute illicit discharge prevention information to wide audiences.

#### D.2 Best Management Practices

Permit Reference/BMP	Annual Reporting	2020-2021
Part II Section D.2 (a) Maintain appropriate legal authorities	N/A, see Part II Section A.1 for reporting of legal authorities	N/A
Part II Section D.2 (b) Maintain a storm sewer system base map of	Report number of major outfalls	179
major MS4 outfalls	Provide overview map of receiving streams and major outfalls	See Map D-1 below
Part II Section D.2 (c) Inspection/detection program to detect dry weather flows at MS4 outfalls	Report number of dry weather inspections completed and results	200 dry weather flow outfall inspections were completed during which no illicit discharges or illicit connections were detected
Part II Section D.2 (d) Employee training	Report number of staff who completed IDDE training and types of training provided	387 City staff completed the IDDE training module through the City's iLearn platform
Part II Section D.2 (e) Maintain a public reporting mechanism(s)	Report number of calls and emails received	City staff responded to 126 calls of potential illicit discharges; 99 calls were received through the City's Stormwater hotline
Part II Section D.2 (f) Documentation	Report dates of investigations, any enforcement action(s) or remediation that occurred	See Table D-1 below



Map D-1 Receiving waters and Major Outfalls

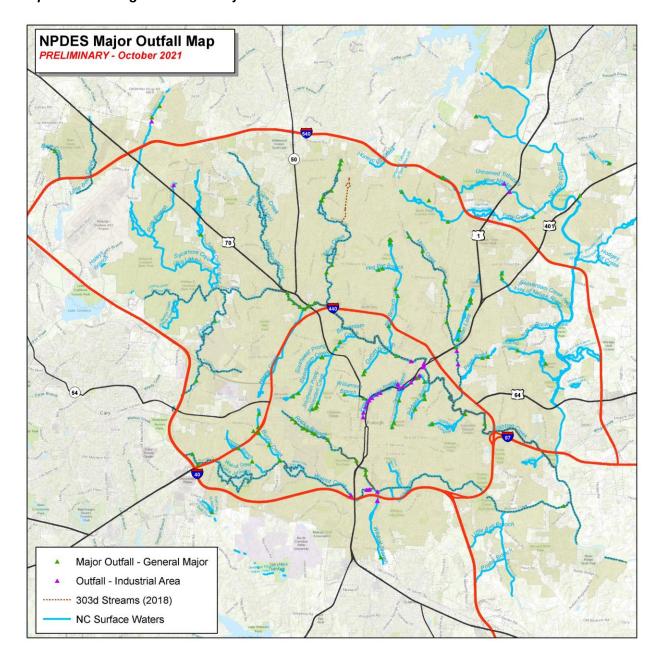




Table D-1 IDDE investigations and actions taken October 1, 2020 – September 30, 2021

Address	Date Received	Date Responded	Description	Action Taken
925 Runnymede Road	10/8/2020	10/8/2020	Complaint of sediment in tributary	Investigated and found not to be a water quality concern; no further action taken
1320 Onslow Road	10/10/2020	10/11/2020	Complaint of blackish sheen in tributary after rain event	Investigated and found not to be a water quality concern; no further action taken
907 Marlowe Road	10/13/2020	10/13/2020	Complaint about flush truck dumping turbid water near Crabtree Creek	Investigated and found not to be a water quality concern; no further action taken
930 Wimbleton Drive	10/13/2020	10/13/2020	Complaint of fish kill	Forwarded to NCDWR
2004 Hornbeck Court	10/15/2020	10/15/2020	Complaint about leaves being blown into catch basin	Investigated and found not to be a water quality concern; no further action taken
2550 Sullivan Drive	10/15/2020	10/15/2020	Possible cross connection	Investigated and found not to be a water quality concern; no further action taken
1400 Beverly Drive	10/22/2020	10/22/2020	Complaint of SS smell behind property	Investigated and found not to be a water quality concern; no further action taken
1700 Nottingham Road	10/26/2020	10/27/2020	Complaint about fuel smell in park	Investigated and found not to be a water quality concern; no further action taken
3708 Swift Drive	10/28/2020	10/28/2020	Complaint of debris being blown into catch basin	Investigated and found not to be a water quality concern; no further action taken
5607 Capital Boulevard	10/1/2020	10/1/2020	Duke Energy transformer leaking mineral oil into catch basin	NOV issued
7440 Six Forks Road	10/10/2020	10/12/2020	Complaint of grease recycle barrel leaking into parking lot	NOV issued
9301 Globe Center Drive	10/15/2020	10/15/2020	Driver spilled solvent into storm system	NOV issued
1041 Wimbleton Drive	10/23/2020	10/23/2020	Complaint of tributary turning white	NOV issued
1317 Wagram Court	10/6/2020	10/6/2020	SSO	PUD reported spill to NCDWR
7404 Boros Place	10/29/2020	10/29/2020	SSO	PUD reported spill to NCDWR
3037 Allenby Drive	10/31/2020	11/2/2020	Possible septic tank failure	Forwarded to Wake County
510 W Martin Street	11/16/2020	11/16/2020	City staff noticed fuel in CB, fuel discharge from rain event	Investigated and found not to be a water quality concern; no further action taken
3808 Edwards Mill Road	11/30/2020	11/30/2020	Parks staff noticed two containers full of used oil in COR park parking lot	Investigated and found not to be a water quality concern; no further action taken



Address	Date Received	Date Responded	Description	Action Taken
6713 Magnolia	11/9/2020	11/9/2020	Private SS service	NOV issued
Court			discharging in parking lot	
4408 Jacqueline	12/9/2020	12/10/2020	Private SS service	NOV issued
Lane			discharging into street	
4620 Kilcullen	11/16/2020	11/16/2020	Private SS service	NOV issued
Drive			discharging into CB	
			behind property	
6012 Viking Drive	11/2/2020	11/2/2020	SSO	PUD reported spill to NCDWR
3316 Alleghany	11/12/2020	11/12/2020	SSO	PUD reported spill to NCDWR
Drive	,,	,,		
3900 Quail	11/12/2020	11/12/2020	SSO	PUD reported spill to NCDWR
Hollow Drive	,,	,,		
1500 Banbury	11/12/2020	11/12/2020	SSO	PUD reported spill to NCDWR
Road	,,	,,		
5839 Capital	11/15/2020	11/15/2020	SSO	PUD reported spill to NCDWR
Boulevard	,,	, ,		
1117 Beacon	11/28/2020	11/28/2020	SSO	PUD reported spill to NCDWR
Lake Drive				
13401 Falls of	12/18/2020	12/18/2020	Fuel spill (Less than 5	Warning letter issued
Neuse Road			gallons)	3 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
3314 Turnbridge	12/7/2020	12/7/2020	Paint spill	NOV issued
Drive			•	
8200 McGuire	12/15/2020	12/15/2020	Private SS service	NOV issued
Drive			discharging on ground	
9299 Glenwood	12/9/2020	12/9/2020	SSO	PUD reported spill to NCDWR
Avenue				·
3120 Walnut	12/23/2020	12/23/2020	SSO	PUD reported spill to NCDWR
Creek Parkway				
740 Powell Drive	12/22/2020	12/23/2020	SS smell near pond on	Investigated and found not to
			park property	be a water quality concern; no
				further action taken
124 W Dawson	1/19/2021	1/19/2021	SWS truck had hydraulic	Investigated and found not to
Street			spill in street	be a water quality concern; no
				further action taken
Reedy Creek	1/29/2021	1/29/2021	Complaint of fuel smell in	Investigated and found not to
Greenway			greenway	be a water quality concern; no
440.5	4/4=/2024	1/1=/0001	505	further action taken
110 Parks at	1/15/2021	1/15/2021	PUD staff noticed staining	Warning issued
North Hills Street	4/45/2224	4/45/2224	behind restaurant	NOV
4325 Glenwood	1/15/2021	1/15/2021	Grease spill	NOV issued
Avenue	4/00/0004	4/04/0004	Deint on III	NOV/:
2330 Churchill	1/20/2021	1/21/2021	Paint spill	NOV issued
Road	4/40/0004	4/40/0004	Drivete CC distance	NOV/ increased
2940 Golden	1/19/2021	1/19/2021	Private SS discharge	NOV issued
Oaks Court	0/4/0004	0/4/0004	Ctoff noticed are	NOV issued
5501 Capital	2/1/2021	2/1/2021	Staff noticed grease	NOV issued
Boulevard	2/5/2024	2/5/2024	spilled in storm inlet	NOV issued
3801 Rolling	2/5/2021	2/5/2021	SS discharging behind	NOV issued
Green Court			property	



Address	Date Received	Date Responded	Description	Action Taken
2901 Boardlands Drive	2/8/2021	2/9/2021	Private SS service discharging in street	NOV issued
2501 W Raleigh Boulevard	2/22/2021	2/22/2021	Oil spill	Summary Memorandum issued
5107 Creedmoor Road	2/23/2021	2/23/2021	Grease spill into catch basin behind building	NOV issued
4200 Quail Hollow Drive	2/25/2021	2/25/2021	Complaint of blueish hue in tributary near park property	Summary Memorandum Issued
3208 Birnamwood Road	2/16/2021	2/16/2021	Concrete wash runoff threatening small tributary near property	Warning letter issued
903 Wakestone Court	2/1/2021	2/2/2021	Complaint of greenish color in tributary	Investigated and found not to be a water quality concern; no further action taken
619 Kirby Street	2/3/2021	2/4/2021	Complaint of gas spill in street	Investigated and found not to be a water quality concern; no further action taken
8701 Wadford Drive	2/8/2021	2/8/2021	Complaint of sewer smell behind building	Investigated and found not to be a water quality concern; no further action taken
2601 Oxford Road	2/15/2021	2/16/2021	Complaint of suds in tributary	Investigated and found not to be a water quality concern; no further action taken
1323 Williamson Drive	2/20/2021	2/22/2021	Complaint of blueish hue in tributary	Investigated and found not to be a water quality concern; no further action taken
600 Rawls Drive	2/2/2021	2/2/2021	SSO	PUD reported spill to NCDWR
1116 Savannah Drive	3/22/2021	3/23/2021	Complaint of grease being dumped into storm inlet	Warning letter issued
904 Ravenwood Drive	3/22/2021	3/23/2021	Complaint of paint in tributary	Investigated and found not to be a water quality concern; no further action taken
6616 Fleetwood Drive	3/1/2021	3/1/2021	Complaint of sediment being discharged into storm inlet from stone cutting	NOV issued
4012 Scofield Drive	3/3/2021	3/3/2021	Private SS service discharging into street	NOV issued
25 Sunnybrook Road	3/6/2021	3/6/2021	PUD informed staff of private SS service discharging into storm inlet	NOV issued
211 Six Forks Road	3/8/2021	3/8/2021	Private SS service discharging into street	NOV issued
521 Brent Road	3/19/2021	3/19/2021	Private SS service discharging into street	NOV issued
1605 Park Drive	3/14/2021	3/15/2021	Cross connection between sewer line and storm line	Investigated and found not to be a water quality concern; no further action taken



Address	Date Received	Date Responded	Description	Action Taken
3600 Capital Boulevard	3/12/2021	3/15/2021	Complaint of wash runoff from car wash going into the storm inlet	NOV issued
3314 Turnbridge Drive	3/16/2021	3/16/2021	Complaint of paint spilling out of dumpster at property	NOV issued
601 W Peace Street	3/23/2021	3/23/2021	Wash runoff from cleaning kitchen mats entering storm inlet	NOV issued
6413 Lakeway Drive	4/5/2021	4/5/2021	Private SS service discharging onto sidewalk	Warning letter issued
3125 Julian Drive	4/12/2021	4/13/2021	Complaint of brownish water behind property	Investigated and found not to be a water quality concern; no further action taken
3711 Jamestown Circle	4/20/2021	4/20/2021	COR staff noticed private sewer service discharging at apartment complex	Investigated and found not to be a water quality concern; no further action taken
4800 Walenda Drive	4/20/2021	4/20/2021	Complaint of trash and debris in and around lake on property	Investigated and found not to be a water quality concern; no further action taken
5217 Poole Road	4/20/2021	4/20/2021	COR staff noticed possible sewer smell in storm inlet	Forwarded to Wake County
7703 Marsh Oak Drive	4/18/2021	4/18/2021	SSO	PUD reported spill to NCDWR
400 Woods of North Bend Drive	4/13/2021	4/13/2021	SSO	PUD reported spill to NCDWR
2712 Discovery Drive	4/1/2021	4/1/2021	SSO	PUD reported spill to NCDWR
510 Cleveland Street	5/5/2021	5/5/2021	Complaint of possible hydraulic fluid spill in street	Investigated and found not to be a water quality concern; no further action taken
1101 Milburnie Road	5/3/2021	5/3/2021	Sodium hydroxide leaked out of container onto City park property	Warning letter issued
6708 Spencer Court	5/6/2021	5/6/2021	Private sewer service discharging into tributary	NOV issued
9531 Waterwood Court	5/20/2021	5/20/2021	Private sewer service discharging into ditch	NOV issued
707 S State Street	5/17/2021	5/17/2021	SSO	PUD reported spill to NCDWR
5536 Neuse View Drive	5/19/2021	5/19/2021	SSO	PUD reported spill to NCDWR
3800 Hillsborough Street	5/24/2021	5/24/2021	SSO	PUD reported spill to NCDWR
5000 Windy Hill Drive	5/24/2021	5/24/2021	SSO	PUD reported spill to NCDWR
11310 Involute Place	6/22/2021	6/22/2021	Complaint of paint spill near storm inlet	Investigated and found not to be a water quality concern; no further action taken



Address	Date Received	Date Responded	Description	Action Taken
4023 Gregory Lane	6/16/2021	6/16/2021	Complaint of sewer discharge on property	Investigated and found not to be a water quality concern; no further action taken
2108 E Millbrook Road	6/7/2021	6/7/2021	Complaint of wash runoff from car wash	Investigated and found not to be a water quality concern; no further action taken
Glenwood Ave @ Harvey Street	6/3/2021	6/3/2021	Fuel spill from vehicle accident during rain event	Investigated and found not to be a water quality concern; no further action taken
2708 South Saunders Street	6/23/2021	6/28/2021	Complaint of runoff from car wash entering storm inlet	Warning letter issued
4325 Glenwood Avenue	6/7/2021	6/8/2021	Grease trap overflowing into storm inlet	NOV issued
8816 Gulf Court	6/14/2021	6/14/2021	Complaint of beer waste leaking into storm inlet	NOV issued
5301 Old Poole Road	6/22/2021	6/23/2021	Complaint of stone cutting dust carried by runoff into storm inlet	NOV issued
6601 Times Drive	6/29/2021	6/29/2021	SSO	PUD reported spill to NCDWR
10210 Sablewood Drive	7/5/2021	7/6/2021	White substance in parking lot	Warning letter issued
10536 Swerling Way	7/19/2021	7/19/2021	Trash in storm drain	Referred to TFS
521 Brent Road	7/19/2021	7/19/2021	Overflowing cleanouts maintained by Public Utilities	Forwarded to PUD
5041 Six Forks Road	7/29/2021	7/29/2021	Broken glass in storm drain	Referred to TFS
9211 Calabria Drive, #110	7/29/2021	7/29/2021	Trash in storm drain	Refereed to TFS
2001 Poole Road	7/14/2021	7/15/2021	Evidence of past wastewater and washing near storm drain	Warning letter issued
2540 Westinghouse Boulevard	7/7/2021	7/7/2021	Fuel spill into catch basins and constructed wetland	Summary Memorandum Issued
3316 Alleghany Drive	7/8/2021	7/8/2021	SSO	PUD reported spill to NCDWR
2739 Rothgeb Drive	7/8/2021	7/8/2021	SSO	PUD reported spill to NCDWR
2220 Grantland Avenue	7/8/2021	7/8/2021	SSO	PUD reported spill to NCDWR
5532 Neuse View Drive	7/8/2021	7/8/2021	SSO	PUD reported spill to NCDWR
556 Dacian Road	7/8/2021	7/8/2021	SSO	PUD reported spill to NCDWR
1020 Sage Green Court	8/9/2021	8/9/2021	Grass clippings in catch basin	Referred to TFS



	Date	Date		
Address	Received	Responded	Description	Action Taken
Lewis Farm Road	8/9/2021	8/9/2021	Natural channel erosion	Investigated and found not to
& Banbury Road				be a water quality concern; no further action taken
Martin Street &	8/17/2021	8/17/2021	Gel tablets and marbles	Investigated and found not to
Salisbury Street			in catch basin	be a water quality concern; no further action taken
3500 Rock Creek Drive	8/30/2021	8/30/2021	SS tap not connected to main SS line	Forwarded to PUD
1301 Mordecai Drive	8/10/2021	8/10/2021	Styrofoam waste from construction in curb line	Warning letter issued
3700 New Bern Avenue	8/17/2021	8/17/2021	Possible fuel spill	Warning letter issued
300 Acorn Street	8/30/2021	8/30/2021	Hydraulic spill residue in curb line	Warning letter issued
10532 Swerling Way	8/30/2021	8/30/2021	Trash in catch basin	Warning letter issued
5101 Glenwood Avenue	8/4/2021	8/4/2021	SSO	PUD reported spill to NCDWR
720 Pershing Road	8/10/2021	8/10/2021	Concrete slurry entering	NOV issued
			adjacent property and stormwater pipe	
5621 Louisburg Road	8/12/2021	8/12/2021	Grease and SS overflow into parking lot	NOV issued
2518 Clark Avenue	8/16/2021	8/17/2021	Paint residue in curb line	NOV issued
8471 Garvey Drive	8/20/2021	8/20/2021	Grease trap overflow into ditch	NOV issued
14307 Foxcroft	8/24/2021	8/24/2021	Private SS tap overflow	NOV issued
Road 7900 Audubon	8/25/2021	8/25/2021	into curb line Hydraulic fluid spill on	Summary Memorandum
Drive	0/23/2021	0/23/2021	neighborhood streets	issued
105 Idlewild Avenue	8/30/2021	8/30/2021	Septic tank overflowing into yard	NOV issued
1510 Graduate Lane	9/16/2021	9/16/2021	SSO	PUD reported spill to NCDWR
741 Bishops Park Drive	9/7/2021	9/8/2021	Report of pressure washer water and paint being discharged into storm drain	Warning letter issued
917 Willow Run South Drive	9/23/2021	9/23/2021	SSO	PUD reported spill to NCDWR
2113 Ridge Road	9/27/2021	9/27/2021	Possible de-watering of	Investigated and found not to
			chlorinated pool water	be a water quality concern; no further action taken
6615 Falls of Neuse Road	9/14/2021	9/14/2021	Overflowing grease trap into parking lot	Warning letter issued
411 W Morgan Street	9/20/2021	9/20/2021	Grease trap spill onto parking lot	Warning letter issued
1113 Temple Street	9/28/2021	9/28/2021	Turbidity in creek	Investigated and found not to be a water quality concern; no further action taken



Address	Date Received	Date Responded	Description	Action Taken
4200 Glenwood Avenue	9/29/2021	9/29/2021	Possible <5 gallons of oil had left NCDOT ROW but did not have potential to impact surface waters	Investigated and found not to be a water quality concern; no further action taken
15267 Tryon Road	9/30/2021	9/30/2021	Possible wash water from the golf carts washing draining to road	Investigated and found not to be a water quality concern; no further action taken

NCDWR = North Carolina Division of Water Resources

PUD = Public Utilities Department SSO = Sanitary Sewer Overflow RFD = Raleigh Fire Department

RPD = Raleigh Police Department

ROW = Right-Of-Way

NOV = Notice of Violation SWS = Solid Waste Services UST = Underground Storage Tank TFS = Transportation Field Services NCDOT = NC Dept. of Transportation

SS = Sanitary Sewer

#### Section E: Construction Site Runoff Controls

#### E.1 Program Narrative

The City has had active construction site runoff control efforts (sedimentation and erosion control) since the 1970s. This program is delegated and overseen by the North Carolina Department of Environmental Quality (NCDEQ). This program includes ordinances, plan review, permitting, inspection, education, and enforcement activities. The City receives and responds to calls and concerns from citizens on a regular basis. All related ordinance changes are noticed and subject to public hearing prior to adoption.

For all projects that disturb greater than one acre, a permit condition is applied which states that a NPDES construction permit is required, and that application should be made to NCDEQ for coverage. In addition, all publicly funded projects that disturb greater than one acre are required to obtain Erosion and Sediment Control plan approval through NCDEQ.

#### E.2 Best Management Practices

Permit Reference/BMP	Reporting Metric(s)	2020-2021
Part II Section E.2 (a) The permittee has a delegated or authorized Sediment and Erosion Control Program. As such, to the extent authorized by law, the permittee is responsible for compliance with the Sediment Pollution Control Act of 1973 and Chapter 4 of Title 15A of the North Carolina Administrative Code. The delegated or authorized Sediment and Erosion Control Program effectively meets the MEP standard for 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 as authorized under the Sediment Pollution Control Act of 1973 and Chapter 4 of Title 15A of the North Carolina Administrative Code.	Report number of inspections and enforcement activities conducted	Inspections: 17,868 NOVs: 18 Civil Penalties: 2



Permit Reference/BMP	Reporting Metric(s)	2020-2021
Part II Section E.2 (b) The NCG010000 permit establishes 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.	N/A, see reporting metrics in Part II Section E.2.a and Part II Section D	N/A
Part II Section E.2 (c) The permittee shall provide and promote a means for the public to notify the appropriate authorities of observed erosion and sedimentation problems. The permittee may implement a plan promoting the existence of the DEQ "Stop Mud" hotline (1-866- STOPMUD) to meet the requirements of this paragraph.	N/A, see reporting metrics in Part II Section B	N/A
Part II Section E.2 (d) For new development and redevelopment projects to be built within the permittee's planning jurisdiction by entities with eminent domain authority, the permittee shall, to the maximum extent practicable, coordinate the approval of the construction site runoff control with the NCDEQ/DEMLR.	Report number of site plans that required NCDEQ coordination	The City issued 105 land disturbance permits that required NPDES construction permit coverage through NCDEQ/DEMLR

#### Section F: Post-construction Site Runoff Controls

#### F.1 Program Narrative

The City's post-construction site runoff controls remain in compliance with the City's MS4 permit through the Neuse Nutrient Sensitive Waters Management Strategy and Water Supply Watershed programs.

The City implements the Neuse Nutrient Sensitive Waters Management Strategy (15A NCAC 2B .0251) throughout the planning jurisdiction of Raleigh. Water Supply Watershed IV (WS-IV) Programs (15A NCAC 2H .0216) are implemented within the Falls Lake watershed, Swift Creek watershed, and Richland Creek watershed.

The City's post-construction site runoff controls are deemed compliant with the implementation of the above-mentioned program measures.

The City has set up a private maintenance policy for owners of private properties with post-construction stormwater control measures (SCMs). Every year, the private property owner must have a licensed professional engineer or landscape architect certify that the SCM is functioning properly and must send that certification to the City. If these inspections and certifications are not made, then notification and enforcement actions, including issuance of civil penalties, are taken.



#### F.3 Best Management Practices

Permit Reference/BMP	Reporting Metric(s)	2020-2021
Part II Section F.2 (a) Post- construction stormwater management program	N/A, see reporting metrics documented in Part II Section A	N/A
Part II Section F.2 (b) Strategies which include	Report number of sites with SCMs	1,155
SCMs appropriate for the MS4	Report number of sites where SCM inspections have been received	1,029
	Report SCM enforcement activities	38 NOVs issued; \$10,000 in civil penalties
Part II Section F.2 (c) Deed restriction and protective covenants	Verify that mechanisms such as recorded deed restrictions, plats, and/or protective covenants are provided so that development activities maintain the project consistent with approved plans	Plat maps and maintenance easements are mechanisms utilized to ensure SCMs are maintained and consistent with the approved plans
Part II Section F.2 (d) Operation and maintenance plan	Report number of sites with newly approved operation and maintenance plans	76
Part II Section F.2 (e) Educational materials and training for developers	Report types of fact sheets/educational brochures developed and/or maintained	Web-based; Annual Inspection requirements, As- Built requirements, Outreach centered around Stormwater Design Manual Update
	Report training events held for developers and number of participants	Quarterly Development Stakeholder Meetings held. At these meetings, updates and stormwater training given for all in attendance. These were held virtually this past year and averaged about 12 developer representatives attending.

## Section G: Pollution Prevention and Good Housekeeping for Municipal Operations

#### **G.1 Program Narrative**

During this reporting period, the City's Stormwater Management Division contracted with a consultant to assist with the further development of the pollution prevention and good housekeeping program. Currently the Stormwater Management Division has developed and implemented a facility inventory,



inspection program, Site Pollution Prevention Plans (SPPPs) and Stormwater Pollution Prevention Plans (SWPPPs), spill response guidance, and staff training.

#### **G.2 Best Management Practices**

Permit Reference/BMP	Reporting Metric(s)	2020-2021
Part II Section G.2 (a) Inventory of municipal facilities and operations	Report inventory of facilities determined to have significant potential for generating polluted stormwater runoff	38 facilities; see Table G-1 below
	Report number of municipal SCMs by type	94 Total: Wet Pond: 8 UG Detention: 6 Swale: 1 Sand Filter: 3 Cistern: 10 Permeable Pavement: 3 Level Spreader w/ Filter Strip: 3 Green Roof: 3 Filterra: 14 Dry Pond: 10 Wetland: 8 Bioretention: 25
Part II Section G.2 (b) Inspection and maintenance program	Report number of facilities inspected	62 facilities were inspected
for municipal facilities and operations	Report corrective actions taken at municipal facilities or operations	SPPPs and SWPPPs have been developed for 17 facilities during this reporting year and are in final draft form
Part II Section G.2 (c) SPPPs for municipal facilities	Report number of facilities with SPPPs/SWPPPs.	38 facilities have SWPPPs/SPPPs in either complete or draft form
Part II Section G.2 (d) Spill response procedures for municipal facilities and operations	Report number of spill response procedures developed/maintained	A city-wide spill response document is in final draft stage with a consultant
Part II Section G.2 (e) Prevent or minimize contamination of stormwater runoff from	Report number of facilities performing vehicle and equipment cleaning operations	10
all areas used for vehicle and equipment cleaning	Report actions taken to prevent or minimize stormwater runoff from vehicle and equipment cleaning	Stormwater staff have inspected all facilities where vehicle and equipment cleaning occur. Several facilities have and maintain oil/water separators, and SPPPs or SWPPPs have been completed or are in final draft form for these facilities.
Part II Section G.2 (f) Streets, roads, and public parking lots maintenance	Report schedule of maintenance activities	All streets are scheduled to be swept twice per year. Adherence to this schedule is contingent on weather.



Permit Reference/BMP	Reporting Metric(s)	2020-2021
Part II Section G.2 (g) Inspection and Maintenance (I&M) for municipally-owned or maintained stormwater control measures	Report number of municipal SCMs inspected  Report length or number of storm sewer conveyance	94; all City-owned regulatory compliance SCMs installed prior to this reporting period have been inspected and certified reports have been submitted.  Number of bridges inspected: 0 Number of crossline conveyances
(SCMs) and the storm sewer system.	system components inspected	(culverts) inspected: 1,374 Linear footage of drainage system that has had CCTV inspection: 105,365 lf Linear footage of drainage system that has pole camera inspection: 112,366 lf Number of catch basins inspected: 1,652 Number of junctions inspected: 40
	Report maintenance and repair actions	Number of storm assets flushed and/or vacuumed: 771 Linear feet of stormwater pipe flushed and/or vacuumed: 22,326 lf Number of crossline conveyances (culverts) maintained: 930 Number of inlet/junction tops reset: 496 Number of inlets/junctions maintained: 1,296 Number of pipes repaired/replaced: 96 Linear feet or channels redefined: 10,705 lf Number of bridges repaired: 2 Number of culverts repaired: 4 Number of catch basins repaired: 542 Number of junctions repaired: 16 Replacement: 27 pipes, 24 inlets,
	Report schedule of maintenance activities	3 junctions  Inlets and accessible junctions are inspected on a 3-year rotation.  Pole camera and CCTV inspection are performed based on need and as required to support the asset management and paving programs.  Repairs and other maintenance are made on an as-needed basis
Part II Section G.2 (h) Staff training	Report types of training provided and number of staff who completed PPGH training	686 City staff completed the PPGH training module via the City's iLearn portal



Table G-1: PPGH inventory of facilities that have high potential to generate polluted stormwater runoff

Facility Name	City Department	
Lake Woodard (PUD)	Public Utilities	
Northeast Remote Operations (Burwell St)	VFS/Parks	
COR Paratransit Operations Facility	Transportation	
Downtown Remote Operations	Engineering Services/Transportation	
Raleigh Transit Operations Facility	Go Raleigh	
New Bern Avenue Maintenance Facility	Raleigh Fire Department/Engineering Services	
Solid Waste-Wilders Grove Service Center	Solid Waste Services	
Yard Waste Facility	Solid Waste, Yard Waste Facility	
Smith Creek WWTP	Public Utilities	
Little Creek WWTP	Public Utilities	
Buffaloe Road Athletic Park	Parks, Recreation and Cultural Resources	
Walnut Creek Park North	Parks, Recreation and Cultural Resources	
Ridge Road Pool	Parks, Recreation and Cultural Resources	
Raleigh Fire Department Facility #1	Raleigh Fire Department	
Mt. Herman Rd Operation Facility	Transportation	
Biltmore Hills Park	Parks, Recreation and Cultural Resources	
Millbrook-Exchange Park	Parks, Recreation and Cultural Resources	
Pullen Park	Parks, Recreation and Cultural Resources	
Optimist Park	Parks, Recreation and Cultural Resources	
Longview Pool	Parks, Recreation and Cultural Resources	
Neuse River Resource Recovery Facility	Public Utilities	
Dempsey E. Benton Water Treatment Plant	Public Utilities	
E. M. Johnson Water Treatment Plant	Public Utilities	
Raleigh Union Station	Transportation	
Bain Odor Control Station	Public Utilities	
Lake Johnson	Parks, Recreation and Cultural Resources	
Dorothea Dix Park	Parks, Recreation and Cultural Resources	
Keeter Training Center	Raleigh Fire Department	
Marsh Creek Facility	Parks, Recreation and Cultural Resources	
North Raleigh Operations Facility	Public Utilities	
South Raleigh Operations Facility	Public Utilities	
East Raleigh Operations Facility	Public Utilities	
E.M. Johnson Water Raw Water Intake	Public Utilities	
Walnut Creek Odor Control and Pump Station	Public Utilities	
Crabtree Creek Odor Control & Pump Station	Public Utilities	
Marsh Creek Odor Control Station	Public Utilities	
Buffaloe Road Odor Control Station	Public Utilities	
Hwy 50 Odor Control Station	Public Utilities	



## Section H: Program to Monitor and Evaluate Stormwater Discharges to Municipal Systems

#### H.1 Program Narrative

The City maintains an inventory of permitted hazardous waste treatment, disposal, and recovery facilities, industrial facilities that are subject to Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA), and industrial facilities identified with an industrial activity permitted to discharge stormwater to the permittee's MS4. The City's program prioritizes and inspects City-owned facilities with Stormwater NPDES Industrial Permits annually and privately-owned facilities with Stormwater NPDES Industrial Permits at least once every three years. Non-exposure sites permitted through the NCDEQ are inspected once every permit cycle.

#### H.2 Best Management Practices

Permit Reference/BMP	Reporting Metric(s)	2020-2021
Part II Section H.2 (a) Maintain an inventory of industrial facilities	Report number of industrial facilities identified within the City's corporate limits	75
Part II Section H.2 (b) Inspection program	Report number of facility inspections conducted	31
	Identify program priorities	City-owned facilities – inspected annually Privately-owned facilities – inspected once every three years Non-exposure sites – inspected once every permit cycle
Part II Section H.2 (c) Evaluate industrial facilities discharging stormwater to the City's MS4	Report number of deficiencies identified and forwarded to enforcement authority (NCDEQ)	2; NCG240012 and NCG200335

### Section I: Water Quality Assessment and Monitoring

#### I.1 Program Narrative

The City has developed and implemented a Water Quality Assessment and Monitoring Program that identifies monitoring locations, a monitoring schedule, monitoring parameters, sample data analysis, and data evaluation and assessment.

#### I.2 Best Management Practices

Permit Reference/BMP	Reporting Metric(s)	2020-2021
Part II Section I.2 (a) Water Quality		Updated sampling map for NPDES sites, laboratory methods for



Permit Reference/BMP	Reporting Metric(s)	2020-2021
Assessment and Monitoring Plan		sample constituents, and SOP information
Part II Section I.2 (b) Water quality monitoring	Report number of stream sites monitored	18
	Report number of samples collected	1,080
	Report parameters analyzed	Total suspended solids, ammonia, total Kjeldahl nitrogen, nitrate/nitrite, total nitrogen (sum of TKN and NO3/NO2, not collected in the field), calcium, copper, magnesium, total phosphorus, zinc, total hardness, turbidity, E. coli
	Report trends in data from stream sites monitored	For the resulting dataset, several constituents reported high rates of non-detect values: zinc (91%, reporting limit .010 mg/L), ammonia (97%, reporting limit 0.10 mg/L), and copper (96%, reporting limit 0.0020 mg/L). Notably total phosphorus also reported non-detect values at a high rate (63%, reporting limit 0.050 mg/L).

## Section J: Total Maximum Daily Loads

#### J.1 Program Narrative

The following TMDLs within Raleigh's MS4 (corporate limits of the City of Raleigh) are noted in Section 2.5 and Table 2 of the SWMP:

- Falls Lake
- Neuse River Estuary
- Pigeon House Branch
- Perry Creek

The Falls Lake and Neuse River Estuary TMDLs are regional TMDLs. The City is addressing the Falls Lake TMDL through its participation in the ongoing 4B Nutrient Management Strategy in collaboration with other municipalities through the Upper Neuse River Basin Association. The City is addressing the Neuse River Estuary TMDL through its implementation of the Nutrient Sensitive Waters Management Strategy and City ordinances adopted as required by State of North Carolina Neuse Nutrient Strategy Rules.

The Pigeon House Branch and Perry Creek TMDLs are local TMDLs. A portion of the Perry Creek watershed is within Raleigh's MS4, and all of the Pigeon House Branch watershed is within Raleigh's MS4. Because NCDEQ has not established numerical Waste Load Allocations (WLAs) for these TMDLs between the City of Raleigh and other entities identified in the TMDL documents, the City has not developed TMDL plans for these watersheds. In late 2021 the City will contract for consulting services to begin TMDL planning for these watersheds in accordance with Part II.J.4 of the City's MS4 permit, which calls for the City to evaluate strategies and implement best management practices to address pollutants of concern in these watersheds within Raleigh's MS4.



## J.2 Best Management Practices

Permit Reference/BMP	Reporting Metric(s)	2020-2021
Part II Section J.3 (a) Identify, describe, and map watershed, outfalls, and streams	Report TMDLs with WLAs within the MS4	N/A
	Report changes in outfall inventory that may be contributing to impairment of identified streams	N/A based on current data.
Part II Section J.3 (b) Evaluate existing measures	N/A, Report pollutants of concern and measures taken for reduction	N/A
Part II Section J.3 (c) Assessment of available monitoring data	N/A, Report monitoring data summary and data trends	N/A
Part II Section J.3 (d) Monitoring Plan	N/A, Report updates to monitoring plan	N/A
Part II Section J.3 (e) Additional Measures	N/A, Report additional measures taken	N/A
Part II Section J.3 (f) Implementation Plan	N/A, Report achievement of schedule milestones	N/A
Part II Section J.3 (g) Incremental Success	N/A, Report successes	N/A
Part II Section J.3 (h) Reporting	N/A Report annual assessment outcomes	N/A