



ROWAN UNIVERSITY

School of Osteopathic Medicine

**STORMWATER POLLUTION
PREVENTION PROGRAM**

N.J.A.C. 7:14A


**40 East Laurel Road Stratford, NJ 08084
NJPDES Permit # NJG0170534**

2023

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SPPP Form 1 – SPPP Team Members

Stormwater Program Coordinator (SPC)	
Print Name and Title	Robert Freedman Director Facilities and Operations
Office Phone # and e-mail	856-566-2732 and freedmanrb@rowan.edu
Signature and Date	
Individual(s) Responsible for Major Development Project Stormwater Management Review Please see training requirements for stormwater management reviewers on Form 9.	
Print Name/ Title/Affiliation	
Print Name/ Title/Affiliation	
Print Name/ Title/Affiliation	
Print Name/ Title/Affiliation	
Print Name/ Title/Affiliation	
Other SPPP Team Members	
Print Name/ Title/Affiliation	Gerald Carey/Director – Marketing/ Rowan University School of Osteopathic Medicine
Print Name/ Title/Affiliation	Thomas Boyle/Assoc. Director EH&S/Rowan University School of Osteopathic Medicine
Print Name/ Title/Affiliation	Philip Powers/Lt. – Public Safety/Rowan University School of Osteopathic Medicine
Print Name/ Title/Affiliation	

SPPP Form 2 – Revision History

	Revision Date	SPC Initials	SPPP Form Changed	Reason for Revision
1.	01/24/2020	TB	01/24/2020	<ul style="list-style-type: none"> • New template updated/added information
2.	09/20/2021	TB	09/20/2021	<ul style="list-style-type: none"> • Additions to reflect comments received during recent inspection.
3.	4/6/2022	TB	4/6//2022	<ul style="list-style-type: none"> • Changed date on the cover of the form.
4.	1/24/2023	TB	1/24/2023	<ul style="list-style-type: none"> • Change date on the cover of the form. • Change name of Stormwater Program Coordinator. • Added Lt. Powers to other SPPP Team Members. • Added information on the public education and outreach events that occurred during the year.
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SPPP Form 3 – Public Involvement and Participation Including Public Notice

1.	Website URL where the Storm Water Pollution Prevention Plan (SPPP) is posted online:	go.rowan.edu/stormwater
2.	Physical location and/or website URL where records of public notices, meeting dates, minutes, etc. are kept:	Facilities Department 1005 UEC
3.	Describe how the permittee complies with applicable state and local public notice requirements when providing for public participation in the development and implementation of its MS4 stormwater program:	
<p>Rowan University School of Osteopathic Medicine will comply with all applicable State and public notice requirements when providing for public participation in the development and implementation of the School's Stormwater Program.</p> <p>For any meetings where public notice is required under the Open Public Meetings Act ("Sunshine Law", N.J.S.A. 10:4-6 et seq.), Rowan University School of Osteopathic Medicine provides public notice in a manner that complies with the requirements of that Act. These records are kept on the website of the Board of Trustees (https://sites.rowan.edu/president/board-of-trustees/index.html)</p>		

SPPP Form 4 – Public Education and Outreach

This is only required for colleges, universities, and military bases with dependents living on base.

1.	Describe how public education and outreach events are advertised. Include specific websites and/or physical locations where materials are available.
<p>Rowan University School of Osteopathic Medicine completed the following for the year 2022 to meet the 12 points required for Public Education and Outreach Activities:</p> <ol style="list-style-type: none">1. Maintain the Stormwater Pollution Prevention website. The website is: https://som.rowan.edu/oursom/campus/stratford/facilities/stormwater.html2. Post stormwater facility signage at our basin that describes the function and importance of the facility, a contact number and our website.3. We had a table in the foyer of the main academic building on Earth Day (Friday, April 22, 2022) and during our Annual Research Day (Thursday, May 5, 2022) to discuss our Stormwater Pollution Prevention plan and provide handouts.4. We had our pull-up banner on display in the foyer of each building on campus during the week of Earth Day (Friday, April 22, 2022) and in the foyer of the Academic Center during our Annual Research Day (Thursday, May 5, 2022).5. Two static monitor displays on fixed TV's throughout the SOM buildings were used to provide information about littering and stormwater pollution prevention. The two static monitor displays on fixed TV's throughout the SOM buildings were displayed the last week of October through the first week of November, 2022.6. We distributed promotional items (pens and refrigerator magnets) when we displayed our pull-up banner and during our Annual Research Day.7. We also had available various educational information provided by the NJDEP when we displayed our pull-up banner and during our Annual Research Day.8. A letter from the Dean of the School was distributed to faculty, staff, and students highlighting the requirements and environmental benefits that we must meet. The letter included the website where our regulatory mechanisms are posted. The letter was distributed the week of Earth Day.9. The SPPP Team worked with our Medical Students and scheduled and completed a clean-up event on campus.10. The SPPP Team worked with our Medical Students to label stormwater inlets with "No Dumping" medallions where needed.11. Facilities Operations completed their annual training workshop. The training included review of our regulatory mechanisms as well as viewing all the videos readily available on the NJDEP website.	
2.	Indicate where public education and outreach records are maintained.
<p>All records associated with education and public outreach are maintained in Facilities.</p>	

SPPP Form 5 – Post-Construction Stormwater Management in New Development and Redevelopment Program

1.	<p>How does the permittee define “major development”</p> <p>Rowan University School of Osteopathic Medicine’s major development in which stormwater runoff will be addressed is defined as:</p> <p>New development or redevelopment that is one (1) acre or more AND is owned or operated by the School.</p> <p>All new development or redevelopment projects that are less than one (1) acre that are part of a larger common plan of development that ultimately disturbs one (1) or more acres.</p>
2.	<p>Describe the process for reviewing and approving major development project applications for compliance with the stormwater management rules at N.J.A.C. 7:8 et seq. Attach a flow chart if available. If applicable, provide the physical location of the mitigation plan required to grant a variance or exemption from the design and performance standards for stormwater management measures.</p> <p>Facilities requires that the Public Complex Permit’s Post-Construction Program Design Checklist for Individual Projects is completed before each project’s construction is approved.</p> <p>Post-Construction forms are stored with the associated project files in Facilities.</p> <p>Facilities will decide on enforcement of these requirements, as these actions are typically completed by engineers and contractors. Any documentation related to this enforcement will be stored with the associated project files in Facilities.</p>
3.	<p>Indicate the physical location of approved applications for major development projects and major Development Summary Sheets (permit Attachment D)?</p> <p>Facilities completes Attachment D major Development Stormwater Summary for Public Complexes through their engineers and/or contractor. Records are stored in Facilities.</p>

SPPP Form 6 – Regulatory Mechanisms

Regulatory Mechanisms	Date of Adoption	Website URL	DEP model regulatory mechanisms adopted w/o change?	Entity responsible for enforcement
1. Pet Waste	9/2021	https://som.rowan.edu/oursom/campus/facilities.html	YES	Public Safety
2. Wildlife Feeding	9/2021	https://som.rowan.edu/oursom/campus/facilities.html	YES	Public Safety
3. Litter Control	9/2021	https://som.rowan.edu/oursom/campus/facilities.html	YES	Public Safety
4. Improper Disposal of Waste	9/2021	https://som.rowan.edu/oursom/campus/facilities.html	YES	Public Safety
5. Residential yard Waste Collection	9/2021	https://som.rowan.edu/oursom/campus/facilities.html	YES	Public Safety
6. Illicit Connection Prohibition	9/2021	https://som.rowan.edu/oursom/campus/facilities.html	YES	Public Safety
<p>Indicate the location of records associated with the regulatory mechanisms above and related enforcement actions:</p> <p>Enforcement actions are located in the Office of Public Safety.</p>				

SPPP Form 7 – Street Sweeping

1.	Provide a map or describe the location of all streets and paved parking lots that are owned or operated by the permittee. Indicate which of these streets and parking lots have storm drain inlets that direct stormwater runoff into an MS4 or discharge directly to surface water.
Rowan University School of Osteopathic Medicine will sweep all defined areas, including paved parking lots and streets owned or operated by the School, with storm drain inlets that direct stormwater runoff into a MS4 or discharge directly to surface water.	
2.	Describe the sweeping schedule for all streets and paved parking lots that are owned or operated by the permittee.
Sweep at a minimum once a month or more frequently as necessary to eliminate reoccurring problems and restore proper function, weather and street surface condition permitting.	
3.	Indicate the location of records, including sweeping dates, areas swept, number of miles swept and total amount of materials collected each month.
Facilities collects this information on a monthly basis. The records associated with each month are kept in Facilities and added to the annual report.	

SPPP Form 8 – Catch Basins and Storm Drain Inlets

1.	Describe the schedule for inspections, cleaning, and maintenance of catch basins and storm drain inlets that are owned or operated by the permittee.
<p>Rowan University School of Osteopathic Medicine has implemented an annual catch basin inspection program. Catch basins will be cleaned to remove debris and maintain catch basin function and efficiency. If, at the time of inspection, no sediment, trash, or debris are observed in a catch basin, then the catch basin will not be cleaned. All catch basins will be inspected each year, even if they were found not to contain sediment, trash, or debris the previous year. If any repairs need to be made, the School will take the proper actions to repair the catch basin(s). The School will take proper measures to see that all catch basins are repaired in accordance with applicable regulations.</p>	
2.	List of locations of catch basins and storm drain inlets with recurring problems, i.e., flooding accumulated debris, etc. For each, describe what measures are taken to address the problems and explain how such work is prioritized.
<p>None at this time. Locations with problems are addressed as they arise. Any repairs are completed by Facilities or a University approved outside contractor.</p>	
3.	Describe the inspection and label maintenance plan on storm drain inlets that do not have permanent wording cast into the design.
<p>Annual inspections of the drain labels are conducted by Facilities and the Office of Environmental Health & Safety. A map has been developed to show the location and condition of all labels on campus. Any missing drain labels are replaced by Facilities.</p>	
4.	Indicate the location of records that include catch basin and storm drain inlet inspections, and the amount of materials collected during catch basin and storm drain inlet cleanings.
<p>All records are maintained in Facilities.</p>	
5.	Describe how the permittee ensures that storm drain inlets within the Public Complex are retrofitted.
<p>Rowan University School of Osteopathic Medicine will when storm drain(s) are damaged or as part of a larger project (repaving that touches a storm drain, etc.) retrofit existing storm drain(s) to meet the most current minimum requirements for storm drains.</p>	

SPPP Form 9 – Employee Training

<p>A. Permittee Employee Training: Stormwater Program Coordinator (SPC) must ensure appropriate staff receive training on topics in the chart below as required due to job duties assigned within three months of commencement of duties and again on the frequency below. Indicate the location of associated training sign in sheets, dates, and agendas or description for each topic.</p>		
Topic	Frequency	Title of Trainer or Office to Conduct Training
1. Maintenance Yard/Ancillary Operations	Every year	Environmental Health & Safety
2. Stormwater Facility Maintenance	Every year	Environmental Health & Safety
3. SPPP Training & Recordkeeping	Every year	Environmental Health & Safety
4. FOR PUBLIC COMPLEXES WITH RESIDENTS ONLY Residential yard Waste Collection	N/A	N/A
5. Street Sweeping	Every year	Environmental Health & Safety
6. Illicit Connections & Outfall Mapping	Every year	Environmental Health & Safety
7. Outfall Stream Scouring	Every year	Environmental Health & Safety
8. Waste Disposal	Every year	Environmental Health & Safety
9. Regulatory Mechanisms	Every year	Environmental Health & Safety
10. Construction Activity/Post-Construction Stormwater Management in New Development and Redevelopment	Every year	Environmental Health & Safety
<p>B. Stormwater Management Reviewer Training: All individuals who review the stormwater management design for development and redevelopment projects on behalf of the permittee must attend the first available class upon assignment as a reviewer and every five years thereafter. The course is a free, two-day training conducted by DEP staff. Training dates and locations are posted at www.nj.gov/dep/stormwater/training.htm.</p> <p>Indicate the location of the permittee's list of the names and dates of individuals that received the Department approved training: Environmental Health & Safety and the Facilities Department.</p>		

SPPP Form 10 – Maintenance Yard and Other Ancillary Operations

1.	Address of maintenance yard or ancillary operation (complete one for per location):
40 East Laurel Road Stratford, NJ 08084	
2.	<p>List all materials and machinery located at this location that are exposed to stormwater which could be a source of pollution in a stormwater discharge.</p> <p>Raw Materials – none</p> <p>Intermediate products – none</p> <p>Final products – none</p> <p>Waste materials – none</p> <p>By-products – none</p> <p>Machinery – School owned vehicles</p> <p>Fuel – Diesel</p> <p>Lubricants – none</p> <p>Solvents – none</p> <p>Detergents related to maintenance yard or ancillary operations – none</p> <p>Other – none</p>
3.	Indicate the location of monthly inspection logs documenting inspection of this location:
Facilities	
4.	Describe the procedures for cleaning spills and disposing of clean-up waste. Indicate the location of materials used for cleaning, e.g., kitty litter, sawdust, etc.
<p>All spills are reported to employee's supervisor and EH&S. Depending on the material spilled and the quantity spilled, employee's and EH&S will clean the spill. If spilled material is deemed hazardous or if quantity spilled is outside of the School's capabilities, the spill contractor, ACV, will be contacted to clean the spill.</p> <p>Spill clean up kits are stored in containers with lids outside of the Science Center, Academic Center and the Rowan Medicine Building.</p>	

5.	List all containers stored at this location, including the content and location. For containers that are stored outside, indicate if they are covered, what they are placed upon, and if the area is graded or contained by berms.
<p>Calcium chloride is stored in containers with lids outside the Science Center loading dock. Spill clean up kits are stored in containers with lids outside of the Science Center, Academic Center and the Rowan Medicine Building.</p> <p>Covered trash containers are placed in high pedestrian traffic areas, common areas, entrances to buildings, and sidewalk entries from parking lots.</p> <p>Closed compactor is located on the Academic Center loading dock.</p>	
6.	For each category below, describe the best management practices in place to ensure compliance with all requirements in the permit. Indicate the location of inspection logs and tracking forms associated with this maintenance yard and ancillary operation, including documentation of conditions requiring attention and remedial actions that have been taken or have been planned.
a. Fueling Operations	
<p>One diesel fuel pump is located on the north side of the Science Center. All employees who use the fueling station are trained at least annually. There are signs posted stating: NO TOPPINNG OFF, STAY IN VIEW OF FUELING NOZZLE, EMERGENCY CONTACT NUMBERS, etc.</p> <p>The nozzle holder is labeled DIESEL FUEL.</p> <p>The fueling area is inspected monthly.</p> <p>Spill absorbent materials are present in a drum located adjacent to the fuel pumps.</p>	
b. Discharge of Stormwater from Secondary Containment	
Secondary containment is inspected for integrity.	
c. Vehicle Maintenance	
All vehicle maintenance is performed off site.	
d. On-Site Equipment and Vehicle Washing	
<i>See permit for certification and log forms for Underground Storage Tanks.</i>	
All on-site equipment and vehicle washing is performed off site.	
e. Salt and De-Icing Material Storage and handling	
<p>Calcium chloride for de-icing purposes are stored outside in containers with covers.</p> <p>The area is inspected monthly.</p>	

f. Aggregate Material and Construction Debris Storage
<p>Rowan University School of Osteopathic Medicine does not store aggregate material on campus.</p> <p>Rowan University School of Osteopathic Medicine does have a construction dumpster on its premises that is removed when full.</p>
g. Street Sweeping, Catch Basin Clean Out and Other Material Storage
<p>Street sweeping and catch basin and storm inlet cleaning is handled by an outside contractor. Materials are transported off campus for disposal.</p>
h. Yard Trimmings and Wood Waste Management
<p>Yard trimmings and wood waste are collected and removed off site periodically by a contractor.</p>

SPPP Form 11 – Mapping Outfall Pipes and Stormwater Facilities

1.	<p>Mapping Outfall Pipes: Attach an image or provide a link to a map of the outfall pipes located on the Public Complex property, showing the location of the end of all MS4 outfall pipes (in tidal and non-tidal receiving waters) owned or operated by the Public Complex which discharge to a surface water body. Include the location and name of all surface water bodies receiving discharges from those outfall pipes.</p> <p><i>Note that the permittee must submit the outfall map to NJDEP by January 1, 2020. Updates to the outfall pipe map shall be submitted annually to include new or newly identified outfall pipes. Outfall pipes may be included on the map of stormwater facilities and submitted with the Annual Report and Certification (see #2 below).</i></p>
	See attached.
2.	<p>Mapping Stormwater Facilities: Attach an image or provide a link to a map of stormwater facilities located on the Public Complex property. Include the property boundaries of the Public Complex, location of each stormwater facility, e.g., outfalls, inlets, basins, subsurface infiltration/detention systems, culverts, MTDs, green infrastructure, etc.</p> <p><i>Note that the permittee must submit the stormwater facilities map to NJDEP by January 1, 2020. Updates to stormwater facilities map shall be submitted annually to include new or newly identified stormwater facilities as an attachment to the Annual Report and Certification.</i></p>
	See attached.

SPPP Form 12 – Outfall Pipe Inspections

1.	<p>Inspections: Describe the program in place to inspect the outfall pipes located on Public Complex property. Records must include the location, inspection date, inspector name, findings, preventative and corrective maintenance performed. Indicate the location of records.</p>
<p>Outfall structures are inspected on an annual basis by Facilities or an outside contractor.</p> <p>Location of inspection and maintenance records and findings are kept in Facilities.</p>	
2.	<p>Stream Scouring: Describe the program in place to detect, investigate and control localized stream scouring from stormwater outfall pipes. Indicate the location of records related to cases of localized stream scouring. Such records must include the contributing source(s) of stormwater, recommended corrective actions, and a prioritized list and schedule to remediate scouring cases.</p>
<p>Stream scouring is included in the annual inspection by Facilities or an outside contractor.</p> <p>Location of records and findings are kept in Facilities.</p>	
3.	<p>1. Illicit Discharge: Describe the program in place for conducting visual dry weather inspections of permittee-owned or operated outfall pipes. Record results of investigations and actions taken using NJDEP's form at https://www.nj.gov/dep/dwq/public_complex/pdf/PC_Illicit%20Connection%20Inspection%20Report%20Formpdf.pdf.</p> <p>Indicate the location of these forms and related illicit discharge records. Note that Illicit Connection Inspection Report Forms shall be included in the SPPP and submitted to NJ DEP as an attachment to the Annual Report and Certification.</p>
<p>Dry weather visual inspections are conducted by Facilities or an outside contractor.</p> <p>Location of records and findings are kept in Facilities.</p>	

SPPP Form 13 – Stormwater Facilities Inspection and Maintenance

1. Inspections: Describe the program in place to inspect, clean, and maintain the stormwater facilities located on Public Complex property. Records must include the type of stormwater facility, location, inspection date, inspector name, findings, preventative and corrective maintenance performed. Indicate the location of records.
Rowan University School of Osteopathic Medicine has implemented an annual inspection of all storm water facilities. This is done by Facilities. Required cleaning and maintenance is performed and records are kept in Facilities.
2. Maintenance: Indicate the location of maintenance plans related to maintenance of stormwater facilities on Public Complex property. <i>NJDEP provides materials to assist permittees with this requirement at https://www.nj.gov/dep/stormwater/maintenance_guidance.htm.</i>
Maintenance plans are located in Facilities.

SPPP Form 14 – Total Maximum Daily Load Information

1. List the names of the adopted Total Maximum Daily Loads (TMDLs), parameters addressed, and the affected water bodies associated with any segment of surface water wholly or partially within or bordering the Public Complex.

Refer to the list of TMDL reports provided at
<http://www.nj.gov/dep/wms/bears/tmdls.html>.

Utilize the TMDL look-up tool at <https://www.nj.gov/dep/dwq/msrp-tmdl-rh.htm> to identify impaired water bodies bordering the Public Complex.

Region	TMDL Impairment	Specific Location	Applicable?
<i>Applicable Stream TMDLs</i>			
27 Streams in the Lower Delaware Water Region	Fecal Coliform	Big Timber Creek North Branch	No. The Big Timber Creek North Branch is not within or bordering Rowan University School of Osteopathic Medicine.
27 Streams in the Lower Delaware Water Region	Fecal Coliform	Cooper River North and South Branch	No. The Cooper River North and South Branch are not within or bordering Rowan University School of Osteopathic Medicine.
122 HUC 14s Statewide	Mercury	Big Timber Creek North Branch (below Laurel Rd)	No. The Big Timber Creek North Branch is not within or bordering Rowan University School of Osteopathic Medicine.
122 HUC 14s Statewide	Mercury	Cooper River (above Evesham Road)	No. Cooper River is not within or bordering Rowan University School of Osteopathic Medicine.
Zones 2 - 5 of the Tidal Delaware Rive	Polychlorinated Biphenyls (PCBs)	Big Timber Creek North Branch (below Laurel Rd)	No. The Big Timber Creek North Branch is not within or bordering Rowan University School of Osteopathic Medicine.
Four Streams Segments and Two Lakes in Cooper River Watershed, Camden County Lower	Polychlorinated Biphenyls (PCBs)	Cooper River (above Evesham Road)	No. Cooper River is not within or bordering Rowan University School of Osteopathic Medicine.

Delaware Water Region			
Four Streams Segments and Two Lakes in Cooper River Watershed, Camden County Lower Delaware Water Region	Phosphorus	Cooper River North and South Branch	No. Cooper River North and South Branch is not within or bordering Rowan University School of Osteopathic Medicine.

<i>Applicable Lake TMDLs</i>			
Region	TMDL Impairment	Specific Location	Applicable?
Two Lakes in Cooper River Watershed, Camden County Lower Delaware Water Region	Phosphorus	Evans Pond & Wallworth Lake	No. Evans Pond & Wallworth Lake are not within or bordering Rowan University School of Osteopathic Medicine.
Lower Delaware Water Region	Phosphorus	Kirkwood Lake	No. Kirkwood Lake is not within or bordering Rowan University School of Osteopathic Medicine.

<i>TMDL Impairment</i>	<i>Source</i>	<i>Source Type</i>	<i>BMP</i>
Fecal Coliform, Phosphorus	Canada Geese	Non-Human	No Feeding of all wildlife is permitted on campus.
Fecal Coliform, Phosphorus	Pet Waste	Non-Human	No pets are allowed on campus unless they are service or emotional support animals – owners are educated on proper waste clean up.
Fecal Coliform, Phosphorus	Stormwater Basins	Non-Human	The School conducts annual stormwater basin clean out and maintenance and storm sewer inlet clean outs. Regular street sweeping occurs.
Fecal Coliform, Phosphorus	Direct Stormwater discharges to waterbodies	Non-Human	The School complies with all state-permitted discharges.

Fecal Coliform, Phosphorus	Farms, zoos, livestock	Human	No farms, zoos or livestock are located on campus.
Fecal Coliform, Phosphorus	Malfunctioning or improperly –sized septic systems	Human	Septic systems are not utilized on campus.
Fecal Coliform, Phosphorus	Failing sewage conveyance systems	Human	Annual inspection of illicit connections are completed.
Fecal Coliform, Phosphorus	Improper garbage storage and disposal	Human	Garbage is properly stored and dispose of on campus.
Phosphorus	Overuse of chemicals	Human	The School utilizes an Integrated Pest Management system which minimizes the use of chemicals throughout campus. The School also does not use fertilizer on the grounds.

- Describe how the permittee uses TMDL information to prioritize stormwater facilities maintenance projects and to address specific sources of stormwater pollutants.

For guidance on TMDLs, visit <https://www.nj.gov/dep/dwq/pdf/10-21-16-tmdl-tool-box.pdf>.

Rowan University School of Osteopathic Medicine reviews approved and adopted TMDL reports for Stratford Borough in Camden County, New Jersey (<https://www.nj.gov/dep/dwq/tmdl/0432.html>) to identify any TMDLs that apply to surface water bodies wholly or partially within or bordering the School. Where applicable, the School would use the information to prioritize maintenance of stormwater facilities and to identify and develop optional measures to address specific sources of stormwater – related pollutants contributing to a body of water with an approved or adopted TMDL.

The TMDLs for Stratford Borough in Camden County, New Jersey are listed above and whether they are applicable to the School.

SPPP Form 15 – Additional Measures and Optional Measures

1. Additional Measures: Describe any Best Management Practice(s) and the related measurable goal or numeric effluent limitations that are expressly required by the Department to be included in the permittee's stormwater program by a TMDL.
Not applicable
2. Optional Measures: Describe any Best Management Practice(s) the permittee has developed that extend beyond the requirements of the Public Complex MS4 NJPDS permit that prevents or reduces water pollution.
Not applicable

SPPP Form 16 – Shared Services

1. List the permit conditions that are satisfied through a shared or contracted service where an entity other than the permittee is implementing BMP(s) or control measure(s) on the permittee's behalf. Include the name of the entity responsible for satisfying each applicable permit condition.

Note that the permittee is responsible for ensuring that the BMP(s)/control measure(s) are at least as stringent or as frequent as the corresponding permit requirement. The permittee is responsible for compliance with the permit if the other entity fails to implement the measure(s) or component(s).

The permittee is responsible for maintaining the appropriate documentation related to permit conditions, including those satisfied through shared services, in the SPPP and on the Annual Report and Certification.

Holden, Inc.

2. For each permit condition that is satisfied through a shared or contracted service, describe the arrangements in place. Indicate the physical location of any written arrangements and records.

Street sweeping is contracted with the Facilities Department. Street sweeping is performed monthly and as requested. Storm inlet and drain basin cleaning is performed annually and as requested.
Lawn service is contract with the Facilities Department
Snow removal is contracted with the Facilities Department