



Phase II Small Municipal Separate Storm Sewer System (MS4) Annual Report

- E. Summarize the public education, outreach, involvement and participation activities you completed during this reporting period: Radio educational ads are run on the local station, and detailed receipts are kept regarding dates and times the ads are run. City of Clinton also partnered with the Water Quality Forum to run a booth at the Knoxville Home and Garden Show where 275 educational contacts were made. COVID canceled many other planned events in Spring 2020.
- F. Summarize any specific successful outcome(s) (e.g., citizen involvement, pollutant reduction, water quality improvement, etc.) fully or partially attributable to your public education and participation program during this reporting period: EPSC brochures handed out for land disturbances less than one acre in size have helped reduce the number of complaints from smaller sites within the jurisdictional area. Also, 275 educational contacts were made at a water education booth at a large regional event.

4. Illicit Discharge Detection and Elimination (Section 4.2.3)

- A. Have you developed and do you continue to update a storm sewer system map that shows the location of system outfalls where the municipal storm sewer system discharges into waters of the state or conveyances owned or operated by another MS4?  Yes  No
- B. If yes, does the map include inputs into the storm sewer collection system, such as the inlets, catch basins, drop structures or other defined contributing points to the sewershed of that outfall, and general direction of stormwater flow?  Yes  No
- C. How many outfalls have you identified in your storm sewer system? 785 so far
- D. Do you have an ordinance, or other regulatory mechanism, that prohibits non-stormwater discharges into your storm sewer system?  Yes  No
- E. Have you implemented a plan to detect, identify and eliminate non-stormwater discharges, including illegal disposal, throughout the storm sewer system? If yes, provide a summary: A recent TDEC audit revealed the need to create an SOP for the IDDE program. Dry weather screenings are occurring with the stream monitoring and mapping efforts.  Yes  No
- F. How many illicit discharge related complaints were received this reporting period? 0
- G. How many illicit discharge investigations were performed this reporting period? 0
- H. Of those investigations performed, how many resulted in valid illicit discharges that were addressed and/or eliminated? 0

5. Construction Site Stormwater Runoff Pollutant Control (Section 4.2.4)

- A. Do you have an ordinance or other regulatory mechanism requiring:
  - Construction site operators to implement appropriate erosion prevention and sediment control BMPs consistent with those described in the TDEC EPSC Handbook?  Yes  No
  - Construction site operators to control wastes such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste?  Yes  No
  - Design storm and special conditions for unavailable parameters waters or Exceptional Tennessee Waters consistent with those of the current Tennessee Construction General Permit (TNR100000)?  Yes  No
- B. Do you have specific procedures for construction site plan (including erosion prevention and sediment BMPs) review and approval?  Yes  No

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- C. Do you have sanctions to enforce compliance?  Yes  No
- D. Do you hold pre-construction meetings with operators of priority construction activities and inspect priority construction sites at least monthly?  Yes  No
- E. How many construction sites disturbing at least one acre or greater were active in your jurisdiction this reporting period? 7
- F. How many active priority and non-priority construction sites were inspected this reporting period? 1
- G. How many construction related complaints were received this reporting period? 12, but most were under an acre

6. Permanent Stormwater Management at New Development and Redevelopment Projects (Section 4.2.5)

- A. Do you have a regulatory mechanism (e.g. ordinance) requiring permanent stormwater pollutant removal for development and redevelopment projects? If no, have you submitted an Implementation Plan to the Division?  Yes  No
- B. Do you have an ordinance or other regulatory mechanism requiring:  
 Site plan review and approval of new and re-development projects?  Yes  No  
 A process to ensure stormwater control measures (SCMs) are properly installed and maintained?  Yes  No  
 Permanent water quality riparian buffers? If yes, specify requirements: \_\_\_\_\_  Yes  No
- C. What is the threshold for development and redevelopment project plans plan review (e.g., all projects, projects disturbing greater than one acre, etc.)? projects > 1 acre in size
- D. How many development and redevelopment project plans were reviewed for this reporting period? 0
- E. How many development and redevelopment project plans were approved? 0
- F. How many permanent stormwater related complaints were received this reporting period? 0
- G. How many enforcement actions were taken to address improper installation or maintenance? 0
- H. Do you have a system to inventory and track the status of all public and private SCMs installed on development and redevelopment projects?  Yes  No
- I. Does your program include an off-site stormwater mitigation or payment into public stormwater fund? If yes, specify. \_\_\_\_\_  Yes  No

7. Stormwater Management for Municipal Operations (Section 4.2.6)

- A. As applicable, have stormwater related operation and maintenance plans that include information related to maintenance activities, schedules and the proper disposal of waste from structural and non-structural stormwater controls been developed and implemented at the following municipal operations:
- Streets, roads, highways?  Yes  No
- Municipal parking lots?  Yes  No
- Maintenance and storage yards?  Yes  No
- Fleet or maintenance shops with outdoor storage areas?  Yes  No
- Salt and storage locations?  Yes  No
- Snow disposal areas?  Yes  No

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Waste disposal, storage, and transfer stations?  Yes  No

B. Do you have a training program for employees responsible for municipal operations at facilities within the jurisdiction that handle, generate and/or store materials which constitute a potential pollutant of concern for MS4s?  Yes  No

If yes, are new applicable employees trained within six months, and existing applicable employees trained and/or retrained within the permit term?  Yes  No

8. Reviewing and Updating Stormwater Management Programs (Section 4.4)

A. Describe any revisions to your program implemented during this reporting period including but not limited to:

Modifications or replacement of an ineffective activity/control measure. A TDEC audit in July 2020 has identified multiple issues that need attention. A detailed compliance schedule has been implemented, and program revisions will be implemented. However, FY20 was filled with mapping improvements, an updated PIE plan, formalizing SWPPP review documentation, and other significant program updates.

Changes to the program as required by the division to satisfy permit requirements. NA  
Information (e.g. additional acreage, outfalls, BMPs) on newly annexed areas and any resulting updates to your program. NA

B. In preparation for this annual report, have you performed an overall assessment of your stormwater management program effectiveness? If yes, summarize the assessment results, and any modifications and improvements scheduled to be implemented in the next reporting period. See detailed compliance objectives outlined in Clinton's audit findings letter.  Yes  No

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9. Enforcement Response Plan (Section 4.5)

- A. Have you implemented an enforcement response plan that includes progressive enforcement actions to address non-compliance, and allows the maximum penalties specified in TCA 68-221-1106? If no, explain. \_\_\_\_\_  Yes  No
- B. As applicable, identify which of the following types of enforcement actions (or their equivalent) were used during this reporting period; indicate the number of actions, the minimum measure (e.g., construction, illicit discharge, permanent stormwater management), and note those for which you do not have authority:

<u>Action</u>	<u>Construction</u>	<u>Permanent Stormwater</u>	<u>Illicit Discharge</u>	<u>In Your ERP?</u>	
Verbal warnings	#24	#0	#0	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Written notices	#0	#0	#0	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Citations with administrative penalties	#0	#0	#0	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Stop work orders	#0	#0	#0	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Withholding of plan approvals or other authorizations	#0	#0	#0	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Additional Measures	#0	#0	#0	Describe: _____	

- C. Do you track instances of non-compliance and related enforcement documentation?  Yes  No
- D. What were the most common types of non-compliance instances documented during this reporting period? Mud in the road, EPSC measures needing maintenance, and damaged silt fence are the most common issues found.

10. Monitoring, Recordkeeping and reporting (Section 5)

- A. Summarize any analytical monitoring activities (e.g., planning, collection, evaluation of results) performed during this reporting period. Benthic collection in August 2020 will fall under FY21 annual report; bacteria sampling should be conducted in that reporting cycle as well.
- B. Summarize any non-analytical monitoring activities (e.g., planning, collection, evaluation of results) performed during this reporting period. Dry weather screening, and outfall monitoring has occurred during mapping efforts, but no visual stream assessments have been conducted yet.
- C. If applicable, are monitoring records for activities performed during this reporting period submitted with this report.  Yes  No

11. Certification

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This report must be signed by a ranking elected official or by a duly authorized representative of that person. See signatory requirements in sub-part 6.7.2 of the permit.

*"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."*

Mr. John Householder  
Printed Name and Title

Signature

9-29-2020  
Date

Annual reports must be submitted by September 30 of each calendar year (Section 5.4) to the appropriate Environmental Field Office (EFO), identified in the table below:

EFO	Street Address	City	Zip Code	Telephone
Chattanooga	1301 Riverfront Pkwy, Suite 206	Chattanooga	37402	(423) 634-5745
Columbia	1421 Hampshire Pike	Columbia	38401	(931) 380-3371
Cookeville	1221 South Willow Ave.	Cookeville	38506	(931) 520-6688
Jackson	1625 Hollywood Drive	Jackson	38305	(731) 512-1300
Johnson City	2305 Silverdale Road	Johnson City	37601	(423) 854-5400
Knoxville	3711 Middlebrook Pike	Knoxville	37921	(865) 594-6035
Memphis	8383 Wolf Lake Drive	Bartlett	38133	(901) 371-3000
Nashville	711 R S Gass Boulevard	Nashville	37216	(615) 687-7000