

# NPDES MS4 Annual Report

version 1.8

(Submission #: HQ6-XG0N-HM7J2, version 1)

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Location: Nashville, Tennessee



## Details

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**Submission ID** HQ6-XG0N-HM7J2

**MS4 Owner Name** City of Athens, TN

## Form Input

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### General Information

**Permit Number**

TNS075141

**MS4 Owner/Operator (e.g. City of ...)**

City of Athens, TN

**County**

McMinn

**Reporting Period**

Per subpart 5.1

- a. The Annual Report shall cover the period beginning on July 1st and ending on June 30th;
- b. The Annual Report shall be due on September 30th after the end of the reporting period.

**Reporting Period Start Date**

07/01/2023

**Reporting Period End Date**

06/30/2024

**MS4 Population At NOI Submittal**

10,001 = Population = 25,000

**Name and contact information of MS4 Responsible Authority (e.g. Mayor ...)**

**Prefix**

Mr.

**First Name      Last Name**

Steven              Sherlin

**Title**

Mayor

**Company Name**

City of Athens

**Phone Type    Number            Extension**

Business        423-744-5821

**Email**

ssherlin@athenstn.gov

**Address**

815 N Jackson St

Athens, TN 37303

## Designated MS4 Stormwater Management Program Contact

**Prefix**

Mr.

**First Name      Last Name**

Benjamin      Burchfield

**Title**

Public Works Director

**Company Name**

City of Athens

**Phone Type      Number      Extension**

Business      423-744-5821

**Email**

bburchfield@athenstn.gov

**Address**

815 N Jackson St

Athens, TN 37303

## MCM 1: Public Education

Below report on the educational activities completed during the reporting year. Delete unused rows (click X at end of row). Add rows (add row button on bottom of table) to report add activities.

**Provide the number of activities completed during the reporting year for the Public (Subpart 4.2.1.1. of the permit).**

2

**Provide the number of activities completed during the reporting year for the Engineering and Development Community (Subpart 4.2.1.2. of the permit).**

0

In the Permit, the question below is phrased "How many employees (that are new to the MS4 or new to the job category) have NOT been educated in accordance with the in accordance with the permit sub-part 4.2.1.3 within 6 months?" In order to make this calculation, count how many employees are new to the MS4 or their Job Category. Subtract the number of employees that were trained in accordance with the PIE plan within 6 months. That result is what is reported in this field. If no employees with applicable job categories/responsibilities hired in this reporting cycle, enter 0.

**For new employees: provide the total number of employees NOT educated in accordance with the PIE plan within 6 months?**

1

**For existing employees: provide the total number of employees NOT educated in accordance with the PIE plan within the permit term.**

28

A population of 10,001 = Population = 25,000 at NOI submittal was selected in the General Information Section. Per Subpart 4.2.1.1. the MS4 is required to conduct one (1) activity during the reporting year addressing each of the four (4) management measures for the public. A single activity may address multiple management measures.

You may need to use the scroll bars to view the whole table.

To Add a Row - Click Add Row near the bottom right of the table

To Delete a Row - Click the "X" at the far right end of the row.

## Column Descriptions

Target Audience (This column is fixed and cannot be changed.)

Activity Description: (Provide details as to the specific activity that was conducted.)

Management Measure: Impacts on Water Quality (Select Yes if the activity listed in this row addressed the 4.2.1.1.a.General awareness of the impacts on water quality.)

Management Measure: SCM/BMP Maintenance (Select Yes if the activity listed in this row addressed the 4.2.1.1.b. Awareness of the importance of maintenance activities for operators of permanent Best Management Practices (BMPs)/Stormwater Control Measures (SCMs).)

Management Measure: Storage, Use, Disposal of Fluids (Select Yes if the activity listed in this row addressed the 4.2.1.1.c. Awareness of the proper storage, use, and disposal of pesticides, herbicides, fertilizers oil and other automotive-related fluids.)

Management Measure: Illicit Discharges (Select Yes if the activity listed in this row addressed the 4.2.1.1.d. Awareness of identifying and reporting procedures for illicit connections/discharges, sanitary sewer seepage, spills, etc.)

Date of Activity (Enter the date the activity took place. If the activity took place across multiple days enter the Date of the first day of the activity.)

Specifically Targeted Audience (This column is used to provide more details as to the audience the activity was targeting e.g. school age children, Homeowners with SCMs) A broad based event such as tabling at a festival may list general public as the specifically targeted audience.

# of Audience (Enter the approximate number of individuals that were reached with this activity.)

Sponsored Activities (Identify if the event sponsored monetarily e.g. money or as a donation in kind e.g. goods or services by the MS4 program. If it was not a sponsored activity, leave N/A in the cell.)

**Provide the status of your MS4 programs public education and outreach activities for the Public audience during the reporting period.**

Target Audience	Activity Description	Management Measure: Impacts on Water Quality	Management Measure: SCM/BMP Maintenance	Management Measure: Storage, Use, Disposal of Fluids	Management Measure: Illicit Discharges	Date of Activity	Specifically Targeted Audience	# of Audience	Sponsored Activities
Public	Enviroscape presentation to local school kids during kids-connection summer learning program about ways we can protect water quality through mitigating spills, proper disposal, litter prevention, etc.	Yes	Yes	Yes	Yes	06/10/2024	Grades K-5	30	N/A
Public	Enviroscape presentation to local school kids during kids-connection summer learning program about ways we can protect water quality through mitigating spills, proper disposal, litter prevention, etc.	Yes	Yes	Yes	Yes	06/12/2024	Grades K-5	30	N/A

A population of 10,001 = Population = 25,000 at NOI submittal was selected in the General Information Section. Per Subpart 4.2.1.2. the MS4 is required to conduct two (2) activities during the permit term addressing each of the two (2) management measures for the Engineering and Development Community. A single activity may address multiple management measures.

You may need to use the scroll bars to view the whole table.

To Add a Row - Click Add Row near the bottom right of the table

To Delete a Row - Click the "X" at the far right end of the row.

**Column Descriptions**

Target Audience (This column is fixed and cannot be changed.)

Activity Description: (Provide details as to the specific activity that was conducted.)

Management Measure: Long Term Water Quality Impacts (Select Yes if the activity listed in this row addressed the 4.2.1.2.a Awareness of the stormwater ordinances, regulations, and guidance materials related to long-term water quality impacts.)

Management Measure: Construction Water Quality Impacts (Select Yes if the activity listed in this row addressed the 4.2.1.2.b. Awareness of stormwater ordinances, regulations, and guidance materials related to construction phase water quality impacts.)

Date of Activity (Enter the date the activity took place. If the activity took place across multiple days enter the Date of the first day of the activity.)

Specifically Targeted Audience (This column is used to provide more details as to the audience the activity was targeting e.g. restaurants, Engineers, Developers ) A broad based event such as tabling at a local trade show may list commercial and development community as the specifically targeted audience.

# of Audience (Enter the approximate number of individuals that were reached with this activity.)

**Provide the status of your MS4 program's public education and outreach activities for the Engineering and Development Community during the reporting period.**

Target Audience	Activity Description	Management Measure: Long Term Water Quality Impacts	Management Measure: Construction Water Quality Impacts	Date of Activity	Specifically Targeted Audience	# of Audience
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**Supporting Documentation for Activities described in this section.**

NONE PROVIDED  
**Comment**  
NONE PROVIDED

**Notes:**  
NONE PROVIDED

## **MCM 2: Public Involvement And Participation**

Below report on the involvement/participation activities completed during the reporting year. Delete unused rows (click X at end of row). Add rows (add row button on bottom of table) to report add activities.

**Is your Stormwater Management Program Plan documentation available online?**

Yes

**Provide the web address for the Stormwater Management Program plan documentation**

[https://athenstn.gov/team\\_athens/city\\_departments/public\\_works/stormwater.php](https://athenstn.gov/team_athens/city_departments/public_works/stormwater.php)

**Was the MS4 program documentation formally placed on public notice during the reporting year?**

No

Prior to the Second annual report due date the MS4 is required to complete the formal public notice process for the entire Stormwater Management Program including response to comments. A copy of the public notice and response to comments shall be provided with the appropriate Annual Report reporting year. See subpart 4.2.2

Subpart 4.2.2. requires the following in the annual report

Detail applicable changes as directed in subpart 4.4.1

This requirement will be located in the Program Modifications Section

**Is information for all construction site projects accessible to the public?**

Yes

**Number of comments received from the public on construction site projects.**

0

**Are all comments from the public on construction site projects considered?**

Yes

**Number of reports (or complaints) during the reporting period received from the public via public reporting system (IDDE reports)?**

6

Provide the number of activities completed during the reporting year for the General Public (Subpart 4.2.2.1. of the permit).

1

Provide the number of activities completed during the reporting year for the Commercial and Development Community (Subpart 4.2.2.2. of the permit).

0

A population of 10,001 = Population = 25,000 at NOI submittal was selected in the General Information Section. Per Subpart 4.2.2.1. the MS4 is required to conduct one (1) activity during the reporting year addressing each of the four (4) management measures for the general public. A single activity may address multiple management measures.

You may need to use the scroll bars to view the whole table.

To Add a Row - Click Add Row near the bottom right of the table

To Delete a Row - Click the "X" at the far right end of the row.

### Column Descriptions

Target Audience (This column is fixed and cannot be changed.)

Activity Description: (Provide details as to the specific activity that was conducted.)

Management Measure: Pollution Prevention (Select Yes if the activity listed in this row addressed the 4.2.2.1.a Pollution Prevention Management Measure.)

Management Measure: Impacts on Water Quality (Select Yes if the activity listed in this row addressed the 4.2.2.1.b. Impacts on water quality or local stormwater management issues.)

Management Measure: Storage, Use, Disposal of Fluids (Select Yes if the activity listed in this row addressed the 4.2.2.1.c. Storage, use, and disposal of household hazardous waste, automotive related fluids, pesticides, herbicides, and fertilizers use.)

Management Measure: Illicit Discharges (Select Yes if the activity listed in this row addressed the 4.2.2.1.d. Identifying and reporting procedures for illicit connections/discharges, sanitary sewer seepage, spills, etc.)

Date of Activity (Enter the date the activity took place. If the activity took place across multiple days enter the Date of the first day of the activity.)

Specifically Targeted Audience (This column is used to provide more details as to the audience the activity was targeting e.g. school age children, Homeowners with SCMs) A broad based event such as tabling at a festival may list general public as the specifically targeted audience.

# of Audience (Enter the approximate number of individuals that were reached with this activity.)

Sponsored Activities (Identify if the event sponsored monetarily e.g. money or as a donation in kind e.g. goods or services by the MS4 program. If it was not a sponsored activity, leave N/A in the cell.)

Provide the status of your MS4 program's public involvement/participation activities for the General Public audiences during the reporting period.

Target Audience	Activity Description	Management Measure: Pollution Prevention	Management Measure: Impacts on Water Quality	Management Measure: Storage, Use, Disposal of Fluids	Management Measure: Illicit Discharges	Date of Activity	Specifically Targeted Audience	# of Audience	Sponsored Activities
General Public	Promote usage of the TDEC funded HHW facility (info for proper storage, use disposal of HHW, reporting IDDE, good housekeeping tips, etc.) during national recycling day	Yes	Yes	Yes	Yes	11/15/2023	homeowners	50	N/A

A population of 10,001 = Population = 25,000 at NOI submittal was selected in the General Information Section. Per Subpart 4.2.2.2. the MS4 is required to conduct two (2) activities during the permit term addressing each of the two (2) management measures for the Commercial and Development Community. A single activity may address multiple management measures.

You may need to use the scroll bars to view the whole table.

To Add a Row - Click Add Row near the bottom right of the table

To Delete a Row - Click the "X" at the far right end of the row.

**Column Descriptions**

Target Audience (This column is fixed and cannot be changed.)

Activity Description: (Provide details as to the specific activity that was conducted.)

Management Measure: Pollution Prevention (Select Yes if the activity listed in this row addressed the 4.2.2.2.a Pollution Prevention Management Measure.)

Management Measure: Impacts on Water Quality (Select Yes if the activity listed in this row addressed the 4.2.2.2.b. Impacts on water quality or local stormwater management issues.)

Date of Activity (Enter the date the activity took place. If the activity took place across multiple days enter the Date of the first day of the activity.)

Specifically Targeted Audience (This column is used to provide more details as to the audience the activity was targeting e.g. restaurants, Engineers, Developers ) A broad based event such as tabling at a local trade show may list commercial and development community as the specifically targeted audience.

# of Audience (Enter the approximate number of individuals that were reached with this activity.)

**Provide the status of your MS4 program's public involvement/participation activities for the Commercial and Development Community during the reporting period.**

Target Audience	Activity Description	Management Measure: Pollution Prevention	Management Measure: Impacts on Water Quality	Date of Activity	Specifically Targeted Audience	# of Audience
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**Supporting Documentation for Activities described in this section.**

NONE PROVIDED  
**Comment**  
 NONE PROVIDED

**Notes:**  
 NONE PROVIDED

**MCM 3: Illicit Discharge Detection & Elimination (IDDE)**

**Is the storm sewer map available through Spatial Rest Services?**  
 Yes

**Provide location for Spatial Rest Service for Map Layer(s)**  
<https://coatn.maps.arcgis.com/apps/instant/basic/index.html?appid=8c9276aeecb94f4eaa5d2a1568dec1b>

**The number of potential illicit discharges reported by the public.**  
 1

**The number of potential illicit discharges reported by internal personnel.**  
 0

**Total number of potential Illicit discharges reported (from any source) that are under investigation at the time of the annual report.**  
 0

**Were all potential illicit discharges investigated within 7 days of receipt?**  
 Yes

**Number of identified illicit discharges**  
 1

**Were all initial enforcement actions on confirmed illicit discharges taken within seven (7) calendar days of the investigation?**  
 Yes

**Number of corrective actions plans received for confirmed illicit discharges.**  
 1

**Were all corrective actions plans reviewed in accordance with established procedures?**  
 Yes

**Total number of non-stormwater discharges or flows investigated.**

0

**Significant Contributor of Pollutants to the MS4**

1.3.3.2. Non-stormwater Discharges

The permittee is authorized to discharge the following non-stormwater sources provided that the permittee has not determined these sources to be significant contributors of pollutants to the MS4:

- Water line flushing
- Landscape irrigation
- Diverted stream flows
- Rising ground waters
- Uncontaminated groundwater infiltration (Infiltration is defined as water other than wastewater that enters a sewer system, including sewer service connections and foundation drains, from the ground through such means as defective pipes, pipe joints, connections, or manholes. Infiltration does not include, and is distinguished from, inflow.)
- Uncontaminated pumped groundwater
- Discharges from potable water sources
- Foundation drains
- Air conditioning condensate
- Irrigation water
- Springs
- Water from crawl space pumps
- Footing drains
- Lawn watering
- Individual residential car washing
- Flows from riparian habitats and wetlands
- Dechlorinated swimming pool discharges
- Street wash water
- Discharges or flows from firefighting activities

Subpart 8.1 Definitions

Significant Contributor is defined as a source of pollutants where the volume, concentration, or mass of a pollutant in a stormwater discharge can cause or threaten to cause pollution, contamination, or nuisance that adversely impact human health or the environment and cause or contribute to a violation of any applicable water quality standards for receiving water.

**MCM 4: Construction Site Stormwater Runoff Pollutant Control**

For reporting construction activities in this section, count all activities e.g., projects, sites that were active during the reporting period. It is understood that activities will overlap multiple reporting years. For example: If a project plan is submitted and reviewed in reporting year 1, that plan review will go only on the report for that year. If that same project begins construction in reporting year 2, it would be included in the year 2 report for active construction activity, but not the year 1 report. If a construction activity is terminated in the beginning of a reporting year before the first inspection for that reporting year is required, that activity may be left off the count.

**Identify if the regulatory mechanisms for construction site runoff control have been updated to be consistent with the CGP?**

Under Development

**Please provide more details on the development process**

Staff is finalizing the updated MS4 regulatory ordinance to reflect updated CGP and NPDES language. The City intends to adopt and begin enforcement prior to EOY.

**Please provide estimated completion date**

12/31/2024

**Total number of active construction activities (or sites).**

20

**Number of new development and redevelopment projects reviewed in accordance with established policies and procedures.**

21

**Were all new development and redevelopment projects reviewed in accordance with the established policy and procedure?**

Yes

**Number of active non-priority construction activities.**

19

**Were all nonpriority active construction activities inspections conducted accordance with Stormwater Management Program.**

Yes

**Number of active priority construction activities.**

1

**Total number of active non-priority construction activities with incomplete inventory information.**

0

**Did all Priority Construction Activities have Pre-Construction meetings?**

Yes

**Were all priority Construction Activities inspected at least once per calendar month?**

Yes

## **MCM 5: Post Construction/ Permanent Stormwater Management**

**Has an offsite mitigation program or payment in lieu into a public stormwater fund been developed as outlined in subpart 4.2.5.3.?**

Yes

**Provide a brief status description status of either the Stormwater Mitigation or Public Stormwater Fund. If the program includes both provide a brief status description for both.**

Language exists in ordinance to make offsite mitigation or payment in-lieu available to developers with verifiable hardships, no developer has demonstrated need to leverage program to-date.

**Number of uncompleted mitigation projects at the end of the previous reporting period.**

0

**Number of mitigation projects completed during the reporting period.**

0

**Number of uncompleted mitigation Projects at the end of the current reporting period.**

0

**Number of uncompleted mitigation projects at the end of the reporting period that began more than 24 months prior to the end of the reporting period.**

0

**Amount (in \$) in Public Stormwater Fund at the end of the reporting period.**

0

**Number of uncompleted mitigation projects due to lack of funds in the Public Stormwater Fund.**

0

**Did all of the projects approved meet the buffer requirements of subpart 4.2.5.4?**

Yes

**Does the Stormwater Management Program implement alternative buffer widths?**

No

The 2009 scorecard can be found on TDEC's website.

[Water Quality Scorecard](#)

### **Scorecard**

NONE PROVIDED

### **Comment**

NONE PROVIDED

**Number of all new development and redevelopment projects reviewed.**

21

**Number of new development and redevelopment projects reviewed in accordance with the established policy and procedure.**

21

**Number of sites verified that 100% of SCMs are installed per design specifications in accordance with approved plan.**

6

Were all SCMs verified to be installed per design specifications in accordance with approved plan within 90 days of installation?

Yes

Does the permittee have adequate legal authority as required by 4.2.5.7 for all SCMs installed?

Yes

Number of SCMs that have not been properly operated or maintained.

20

Please Note: This question is asking for the number of SCM that have **NOT** been properly operated or maintained. These are going to be the SCMs with issues that require some action to return to proper operations such as maintenance or repairs.

Have enforcement actions been taken in accordance with the appropriate legal authority or ERP?

No

Number of public requests for SCM inventory.

0

Are all SCMs in the inventory tracking system?

No

Do all SCMs in the inventory tracking system have complete information?

No

SCM inventory tracking system information

NONE PROVIDED

Comment

NONE PROVIDED

### MCM 6: Pollution Prevention/Good Housekeeping For Municipal Operations

Number of applicable Municipal Operations and Facilities under subpart 4.2.6.2.

1

Do all applicable Municipal Operations and Facilities have a O&M Facility Plan?

Yes

Number Municipal Operations Facilities NOT inspected in accordance with the Stormwater Management Program in the previous 12 months.

0

### Stormwater Management Program Modification

Have any municipal facilities covered under this permit been added during the reporting term?

No

In the table below identify if any changes were made to your Stormwater Management Program during the reporting period.

For minor modifications that add, but neither subtract nor replace, components, controls, or requirements to the Stormwater Management Program provide a description of that modification. - See Subpart 4.4.1.1.a

For minor modifications that replace an ineffective or infeasible BMP, or SCM which is specifically identified in the Stormwater Management Program provide a description of the analysis of why the former BMP was ineffective or infeasible; Expectations on the effectiveness of the replacement BMP or SCM; and an analysis, if applicable, of why the replacement BMP or SCM will ensure the optimization of equipment use. a description of that modification. - See Subpart 4.4.1.1.e

For major modifications that subtract BMPs, SCMs, components, controls, or requirements of the Stormwater Management Program provide a description of the analysis of why the component was ineffective or infeasible; and detailed explanation of why, with the elimination of this component, the Stormwater Management Program will continue to achieve a reduction in pollutants to the MEP and shall not cause or contribute to violations of State water quality standards in the receiving stream. - See Subpart 4.4.1.2.a.

Where any changes were made to the program elements during the reporting period?

Program Elements	Changes	Modifications that Add Components	Replaced an Ineffective or Infeasible BMP or SCM	Subtracted BMP, SCM, Components, Controls etc.
MCM 1	No	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED
MCM 2	No	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED
MCM 3	No	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED
MCM 4	No	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED

Program Elements	Changes	Modifications that Add Components	Replaced an Ineffective or Infeasible BMP or SCM	Subtracted BMP, SCM, Components, Controls etc.
MCM 5	No	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED
MCM 6	No	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED
QLP	No	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED
Enforcement	No	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED
Monitoring & Program Evaluation	No	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED

**Other Program Changes not Identified above**

NONE PROVIDED

**Summary Of Enforcement Actions**

Note: Non-traditional MS4s may not have legal authority to enforce one or more MS4 permit requirements. For example, a university campus regulated as a MS4 permittee or co-permittee may not have the legal authority to enforce MS4 permit requirements against another entity.

**Summary of Enforcement Actions Taken during the reporting year**

Action	IDDE	Construction	Permanent Stormwater/Post-Construction	Total
Verbal Warnings	1	2	0	3
Written Notice of Violation	0	0	0	0
Citations or Administrative Orders	0	0	0	0
Stop Work Orders	0	0	0	0
Withholding of Plan Approvals or Other Authorizations	0	0	0	0
Civil Penalties	0	0	0	0
Additional Measures	0	0	0	0
				Sum: 3

**Results Of Information Collected And Analyzed (Monitoring)**

**Was monitoring for the reporting year performed in accordance with either 4.6.1.1.1 (Option 1) or 4.6.1.1.2 (Option 2)?**

No

**Provide a summary describing the results of information collected and analyzed, including monitoring data (analytical and non-analytical), if any, during the reporting period. If no monitoring was completed, explain.**

Staffing turnover has impacted the department's ability to perform VSS and monitoring as planned during the reporting cycle. The department intends to undertake assessment in the current reporting cycle with a combination of internal efforts and 3rd party assistance in order to address the deficiency.

For your convenience, links to the required standard templates for reporting the results of your monitoring data are provided below. EDD Sheets (Field Stream Survey and Habitat Sheets, Macroinvertebrate Taxa Report, and the TDEC E. coli and Field Water Parameter Report) are in the section labelled Water Quality Assessment Publications as excel files.

[Publications](#)

**Legal Authority**

Per subpart 4.7.1. The initial solicitor's statement is required in the 2024 annual report for existing permittees and in the third annual report for new permittees.

If modifications are made to the legal authority that necessitate a new evaluation by a solicitor, a new certification statement must be submitted.

Per subpart 4.1.2. All updates to the legal authority (ordinances/resolutions etc.) required by changes to the permit shall be fully implemented and adopted.

**Attach a signed solicitor's certification statement.**

[Solicitors Certification Statement Placeholder Letter.pdf - 09/30/2024 02:24 PM](#)

**Comment**

Attached letter details updates to regulatory authority

**In order to facilitate the review of the legal authority, please indicate if you used the 2023 MTAS MS4 Model Ordinance?**

NONE PROVIDED

**Attach Legal Authority - Ordinances, Resolutions, etc**

[Ordinance and Municipal Code Establishing Stormwater Management Program.pdf - 09/30/2024 02:07 PM](#)

**Comment**

NONE PROVIDED

**Attach Legal Authority - Enforcement Response Plan and List or Table of Progressive Enforcement Actions**

[Ordinance and Municipal Code Establishing Stormwater Management Program.pdf - 09/30/2024 02:08 PM](#)

**Comment**

NONE PROVIDED

**Stormwater Management Program Evaluation**

**Stormwater Management Program Evaluation**

In accordance with subpart 4.6.2. The permittee shall conduct an annual evaluation of the Stormwater Management Program to evaluate compliance with the terms and conditions of the permit, including the effectiveness of the BMPs, components, or controls of its stormwater management program, and the status of achieving the measurable requirements in the permit.

**Summarize the results of the permittee's annual evaluation of the current Stormwater Management Program.**

The internal evaluation of the City's MS4 program is that it is operating at a medium-low level of effectiveness. The City is still working to maintain its routine contributions in terms of public outreach and education in MCMs 1 & 2, but it is still developing internal training for new and existing employees which it is looking to implement in the coming reporting period. The City did not have many reports/responses for MCM 3 but handled these as required. It is still strong in plans review and holding construction projects accountable, and now has a TNEPSC LVL 2 certified staff member, which it was lacking last reporting period. The Department did perform SCM inspections as part of MCM 5 but was deficient in response to following up with property owners to initiate remedial actions to their respective deficient SCMs. This is where further staffing is sorely needed to help manage the follow-up on the ERP backend. With respect to MCM 6, work is still necessary to fully build out the O&M plan for facilities, but it is making forward progress. Lastly, and most notably needed, is that the City has yet to pass an ordinance updating its program to comply with all new CGP and NPDES PH 2 MS4 permit requirements. It is behind on this, and will complete this object prior to EOY. The City also intends to undertake efforts to perform monitoring activities, even if to the minimum degree, over the fall-winter in order to make an effort to get back into compliance with monitoring intervals.

**Identify modifications or replacement of an ineffective activity/control measure/component/BMP.**

Items needed are as outlined in the evaluation.

**Summarize the assessment results, and any modifications and improvements scheduled to be implemented in the next reporting period to improve the program or remedy deficiencies or weaknesses**

Unfortunately, the City has failed to stay on track for its implementation target timeline to implement program updates in accordance with new MCM requirements and did not implement during the reporting cycle. Department staff are finalizing program updates in an effort to move expeditiously to Council review and approval before end of the calendar year. While this will address the deficiencies of the program with respect to new standards and regulatory requirements, the City must address funding support for staffing to ensure a more effective and successful MS4 program.

**Is MCM 1: Public Education and Outreach on Stormwater Impacts compliant with Permit Requirements?**

No

**Please Explain**

Existing and new employee annual training must be implemented.

**Is MCM 2: Public Involvement/Participation compliant with Permit Requirements?**

Yes

**Is MCM 3: Illicit Discharge Detection and Elimination (IDDE) compliant with Permit Requirements?**

Yes

**Is MCM 4: Construction Site Stormwater Runoff Control compliant with Permit Requirements?**

Yes

**Is MCM 5: Post-Construction/Permanent Stormwater Management in New Development and Redevelopment compliant with Permit Requirements?**

No

**Please Explain**

Permanent SCM inspections were performed during reporting period, but follow-up in accordance to ERP was not satisfied. Responses for deficient SCMs will be handled in next reporting period to bring deficient SCMs back into compliance.

**Is MCM 6: Pollution Prevention/Good Housekeeping compliant with Permit Requirements?**

Yes

**Is Monitoring Program (subpart 4.6.1.1) compliant with Permit Requirements?**

No

**Please Explain**

Department is not in alignment with 5-year monitoring intervals. We expect to initiate some VSS this fall-winter in order to catch back up, as well as leverage 3rd party assistance to perform testing in accordance to TDEC EDD templates.

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The following questions are from subpart 5.2 Annual Report Requirements.

**Is the permittee compliant with the permit terms and conditions?**

No

This determination should be made as to the status of the program at the end of the reporting period and the requirements applicable at that date. For

example, the permanent stormwater program changes are not required to be implemented until 24 months after the effective date of the permit. So if the MS4 has not yet implemented those changes at the first annual report, they would still be in compliance, if their program meets the previously established requirements.

**Please Explain**

The City Public Works Department has struggled to incrementally progress towards fulfilling its NOI goals and other previously stated program compliance goals to update the stormwater program to satisfy the NPDES Ph II MS4 permit requirements per TDEC. It will make an all-hands effort during the upcoming reporting period to get back into compliance to the maximum extent practicable, but as has been alluded to, dedicated staffing and funding support is desperately needed in order to ensure an effective and well-run program.

**Is the permittee relying on another governmental entity to satisfy some of the permit obligations?**

No

**Enter additional or clarifying information not elsewhere reported in this document.**

NONE PROVIDED

**Any other data specifically requested by the Division to substantiate statements and conclusions reached in the Annual Reports.**

NONE PROVIDED

**Comment**

NONE PROVIDED