

**TDEC Small MS4 Annual Report**  
**2nd Year July 1, 2008 – June 30, 2009**  
**Report due September 30, 2009**

**Permittee Tracking No.** TNS 080055

**Permittee Name:** City of Spring Hill

**This report must be signed by a ranking elected official or by a duly authorized representative of that person. See signatory requirements in part 6.7 of the small MS4 general 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.”*

\_\_\_\_\_  
Signed

\_\_\_\_\_  
Dated

Honorable Michael Dinwiddie, Mayor

\_\_\_\_\_  
Printed Name and Title

**Send the annual report to the two addresses shown on the next page.**

**Submit your annual report to the Environmental Assistance Center  
for your county as shown in the map below *and* to the following  
address:**

**Mr. Vojin Lanjic  
Tennessee Division of Water Pollution Control  
L&C Annex, 6<sup>th</sup> Floor  
401 Church Street  
Nashville, TN 37243-1534**

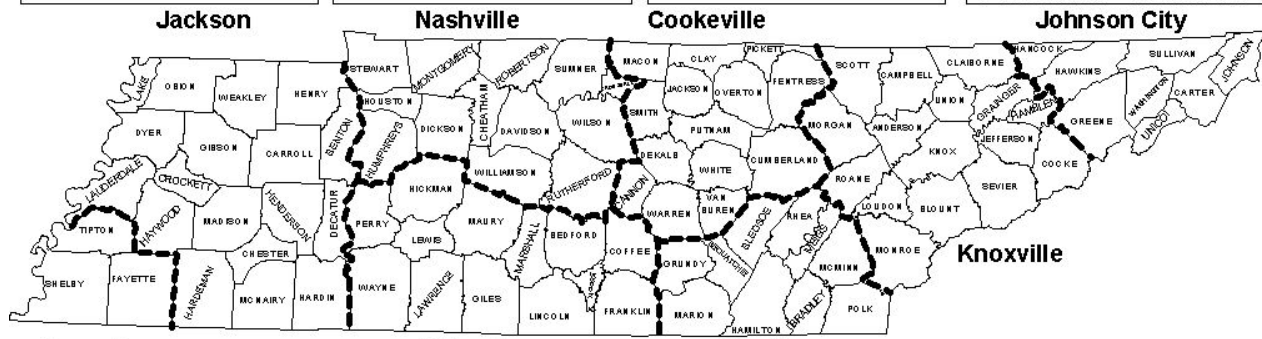
**Tennessee Department of Environment and Conservation  
Environmental Assistance Center Boundaries  
1-888-891-TDEC**

**Jackson EAC (J)**  
362 Carriage House Drive  
Jackson, TN 38305-2222  
fax 731-661-6283  
  
**731-512-1300**  
  
*WPC Mgr - Pat Patrick  
EAC Mgr - Rudy Collins  
Env Coord - Vaughn Cassidy  
Administrator - Carol Pollan*

**Nashville EAC (N)**  
711 R. S. Gass Boulevard  
Nashville, TN 37243  
fax 615-687-7078  
  
**615-687-7000**  
  
*WPC Mgr - Joe Holland  
EAC Mgr - Brenda Apple  
Env Coord - Charles Jobe  
Administrator - Steve Janes*

**Cookeville EAC (CK)**  
1221 South Willow Avenue  
Cookeville, TN 38506  
fax 931-432-6952  
  
**931-432-4015**  
  
*WPC Mgr - Fran Baker  
EAC Mgr - Jimmy Lee Clark  
Env Coord - John Bowers  
Administrator - D. Jan Tollett*

**Johnson City EAC (JC)**  
2305 Silverdale Road  
Johnson City, TN 37601-2162  
fax 423-854-5401  
  
**423-854-5400**  
  
*WPC Mgr - Andrew Tolley  
EAC Mgr - Mark Braswell  
Env Coord - Janice Bowers  
Administrator - Larna Smith*



**Memphis EAC (M)**  
Suite E-645, Perimeter Park  
2510 Mount Moriah Road  
Memphis, TN 38115-1520  
fax 901-368-7979  
  
**901-368-7939**  
  
*WPC Mgr - Terry Templeton  
EAC Mgr - Jim Chaney  
Env Coord - Vaughn Cassidy  
Administrator - Bill Relker*

**Columbia EAC (CL)**  
2484 Park Plus Drive  
Columbia, TN 38401  
fax 931-380-3397  
  
**931-380-3371**  
  
*WPC Mgr - Tim Wilder  
EAC Mgr - Joe Holmes  
Env Coord - John Bowers  
Administrator - Sheila Woodard*

**Chattanooga EAC (CH)**  
Suite 550, State Office Bldg.  
540 McCallie Avenue  
Chattanooga, TN 37402  
fax 423-634-6389  
  
**423-634-5745**  
  
*WPC Mgr - Richard Urban  
EAC Mgr - Stan Boyd  
Env Coord -  
Administrator - Andra Kelley*

**Knoxville EAC (K)**  
Suite 220, State Plaza  
2700 Middlebrook Pike  
Knoxville, TN 37921  
fax 865-594-6105  
  
**865-594-6035**  
  
*WPC Mgr - Paul Schmierbach  
EAC Mgr - Phil Chambers  
Env Coord - Mark Penland  
Administrator - Mark Sweat*

RW M c  
1/9/03

## Table of Contents

<b>I.</b>	<b>Status of Compliance with Permit Conditions (5.4.1) Six Minimum Measures, BMPs and Milestones</b> .....	<b>1</b>
	<b>A. Status of Compliance with BMP Milestones</b> .....	<b>1</b>
	<b>B. Status of compliance for <i>amended and replaced BMPs</i></b> .....	<b>2</b>
<b>II.</b>	<b>Assessment of the appropriateness of identified BMPs (5.4.1)</b> .....	<b>4</b>
<b>III.</b>	<b>Progress with respect to MEP and Measurable Goals (5.4.1)</b> .....	<b>6</b>
	<b>A. MEP</b> .....	<b>6</b>
	<b>B. Measurable goals</b> .....	<b>6</b>
<b>IV.</b>	<b>Results of Information Collected and Analyzed (5.4.2)</b> .....	<b>7</b>
<b>V.</b>	<b>Planned Activities and Proposed Changes to the Storm Water Management Program (5.4.3 and 5.4.4)</b> .....	<b>8</b>
	<b>A. Storm water activities planned for next reporting cycle</b> .....	<b>8</b>
	<b>B. Proposed changes to storm water management program</b> .....	<b>9</b>
<b>VI.</b>	<b>Water Quality Controls for Discharges to Impaired Waterbodies (3.1.2)</b> .....	<b>11</b>
<b>VII.</b>	<b>Protection of Listed Threatened or Endangered Species (3.2)</b> .....	<b>13</b>
<b>VIII.</b>	<b>Explanation of Amended or Replaced BMPs (from Part I)</b> .....	<b>14</b>
<b>IX.</b>	<b>Tracking of measurable goals</b> .....	<b>17</b>
	<b>Footnotes</b> .....	<b>21</b>

# I. Status of Compliance with Permit Conditions (5.4.1) Six Minimum Measures, BMPs and Milestones

## A. Status of Compliance with BMP Milestones

The following table is designed for you to report the status of your progress in implementing storm water management BMPs. The table includes a list of BMPs by the code number. These BMP codes refer to the BMPs, and the respective codes, that you submitted to us in your NOI. [Or, in annual reports for years 2-5, these codes refer to amended BMPs as you reported to us in the previous year's annual report]. Add rows if you have more than four BMPs; e.g., 1A, 1B, 1C, 1D, 1E, 1F.

Likewise, the milestone refers to the Year 4 milestone that you included in your NOI. [Or, in subsequent annual reports, the milestone refers to the milestone that you reported to us in the previous year's annual report.]

You must check Yes or No for each of the BMPs that you submitted in your NOI.

- Check **Yes** if the BMP is essentially unchanged and you accomplished the milestone. Indicate a date of completion.
- Check **No** if you did not accomplish the milestone. If you check No, and you are not changing or replacing the BMP or the milestones, indicate the date you expect to complete the milestone.
- Check in one of the **Amended** columns if you wish us to recognize an amended BMP or an amended milestone. If you are amending the BMP, most likely you will also need to amend the milestone, and in that case, check both Amended BMP and Amended Milestone. If the BMP is unchanged, but you are changing milestones in subsequent years, check in the Amended Milestones column.
- If you indicate an amended BMP or milestone, then you should check in last column as well, indicating that you describe the amendment below and provide the necessary analysis in Part VIII.

BMP Code	Milestone	Yes	No	Date completed or If "No," Date to be completed	Amended/Replaced		An "Amended" response is described below and in Part VIII.
					BMP	Milestones	Yes/No
1A	Year 2	X		September 2008			
1B	Year 2	X		October 2008			
1C	Year 2	X		September 2008			
1D	Year 2	X		August 2009			
2A	Year 2	X		November 2007			
2B	Year 2	X		November 2007			
2C	Year 2			September 2008			

BMP Code	Milestone	Yes	No	Date completed or If "No," Date to be completed	Amended/Replaced		An "Amended" response is described below and in Part VIII.
					BMP	Milestones	Yes/No
2D	Year 2	X		September 2009			
3A	Year 2	X		November 2007			
3B	Year 2	X		May / June 2009			
3C	Year 2	X		November 2007			
3D	Year 2	X		June 2009			
4A	Year 2	X		October 2007			
4B	Year 2	X		October 2007			
4C	Year 2	X		July 2007			
4D	Year 2	X		July 2007			
5A	Year 2	X		November 2007			
5B	Year 2	X		August 2008			
5C	Year 2	X		August 2008			
5D	Year 2	X		June 2008			
6A	Year 2	X		December 2007			
6B	Year 2	X		July 2009			
6C	Year 2	X		July 2009			
6D	Year 2	X		April 2009			

**B. Status of compliance for amended and replaced BMPs**

For every amended/replaced BMP and/or milestone above, provide the compliance status with respect to the new milestone for this year. The new milestones must be detailed in Part VIII.

BMP Code	Milestone	Milestone Description	Yes	No	Date completed or If "No," Date to be completed

BMP Code	Milestone	Milestone Description	Yes	No	Date completed or If "No," Date to be completed

**Explanation for "No" Responses in either table above**

BMP Code	Explanation for "No" Response

Go to next page.

## II. Assessment of the appropriateness of identified BMPs (5.4.1)

For every BMP or amended BMP, assess the appropriateness of the BMP in the following table. For the first year annual report, assume “Good” unless you have evidence to support an inappropriate, minimal or superior assessment.

BMP Code	Short title	We consider the listed BMP appropriate to the following degree:				
		Inappropriate	Minimal	Good	Superior	
1A	Web Site – Public Education			X		
1B	Public Education and Outreach Programs			X		
1C	Hot Line			X		
1D	Public Meetings			X		
2A	Storm Water Advisory Committee			X		
2B	Storm Water Administrative Board			X		
2C	Public Meetings			X		
2D	Citizens Action Groups			X		
3A	Municipal Storm Water Ordinance			X		
3B	Dry Weather Screening			X		
3C	Hot Line and Complaint Tracking System			X		
3D	Storm Water System Inventory and Map			X		
4A	Construction Site Runoff Control Programs			X		
4B	Review Permitting Process			X		
4C	Manual for Erosion Prevention and Sediment control			X		
4D	Construction Site Inspection Program			X		
5A	Post Construction Runoff Control			X		
5B	Inspection and Reporting			X		
5C	Manual for Post Construction BMP's			X		
5D	Structural and Non-Structural Strategies for Post Construction Runoff Control			X		
6A	Storm Water Quality ( Standard Operating Procedures)			X		
6B	Right of Ways and MS4 Maintenance Procedures			X		
6C	Inspection and Maintenance of Public Drainage Infrastructure			X		
6D	Employee Training and Education			X		



### III. Progress with respect to MEP and Measurable Goals (5.4.1)

Element 5.4.1 requires you to report progress towards achieving the statutory goal of reducing the discharge of pollutants to the maximum extent practicable (MEP)<sup>1</sup>, and the measurable goals for each of the minimum control measures.

#### A. MEP

*Of the [ 24 ]<sup>2</sup> BMPs that comprise our storm water management program in the six minimum measures, we have accomplished Year 4 milestones for [ 24 of 24 ]<sup>3</sup>. This does / does not represent substantial progress in achieving the statutory goal of reducing the discharge of pollutants to the MEP.*

#### B. Measurable goals

*Of the [ 24 ] BMPs shown above, we have accomplished Year 4 milestones for [ 24 of 24 ]. This represents progress toward achieving the measurable goals identified in our original NOI and in this annual report. For the measurable parameters/goals we have been able to track for this past year, the measurements are recorded in Part IX.*

\_\_\_\_\_  
Signed

\_\_\_\_\_  
Dated

\_\_\_\_\_  
Honorable Michael Dinwiddie, Mayor  
Printed Name and Title

Go to next page.

#### IV. Results of Information Collected and Analyzed (5.4.2)

Element 5.4.2 of the permit requires you to report results of information collected and analyzed, if any, during the reporting period, including monitoring data used to assess the success of the program at reducing the discharge of pollutants to the MEP

*A brief summary of information, including analytical and/or non-analytical monitoring results, is listed below. Detailed information is collected and available at the offices of the MS4.*

<b>Parameter</b>	<b>Relevant BMP, or Purpose of Information</b>	<b>Conclusions</b>
N/A	N/A	N/A

Go to next page.

## V. Planned Activities and Proposed Changes to the Storm Water Management Program (5.4.3 and 5.4.4)

### A. Storm water activities planned for next reporting cycle

Element 5.4.3 requires a summary of the storm water activities you plan to undertake during the next reporting cycle (including an implementation schedule).

*The storm water activities planned for the next reporting cycle are the BMPs as reflected in our NOI and as amended (if any) in subsequent annual reports, including this annual report, and are as follows:*

<b>BMP Code</b>	<b>Title/Name of BMP</b>	<b>Milestone for next reporting cycle</b>
1A	Web Site – Public Education	Create database reports accessible from web page activities
1B	Public Education and Outreach Program	Organize Civic Groups for Spring Hill Clean up Programs
1C	Hot Line	Develop reporting system to generate Annual Report
1D	Public Meetings and Training Seminars	Provide ongoing notifications to Storm Water Committee meetings and invite interested participants
2A	Storm Water Advisory Committee	Hold Semi-annual meeting to discuss and review ordinances
2B	Storm Water Administrative Board	Set hearing and appeal process for violations
2C	Public Meetings	Annual report meeting
2D	Citizen Action Groups	Civic groups, churches Scouts, ROTC, industries to organize work day efforts
3A	Municipal Storm Water Ordinance (prohibit illicit discharges)	Revise existing ordinances to eliminate contradictions and consolidate
3B	Dry Weather Screening	Screen 25 % of outfalls and coordinate with inventory mapping efforts
3C	Hot Line and Complaint Tracking System	Track and respond to calls
3D	Storm Water System Inventory and Map	Inventory mapping 100 % complete and database set up
4A	Municipal Storm Water Ordinance: Construction Site Runoff Control Program	Review and revise existing ordinances and regulations to eliminate contradictions and consolidate requirements
4B	Review Permitting Process	Implement procedures and develop data base for tracking, recording and reporting
4C	Manual for Erosion Prevention and Sediment Control	Publish manual and make copies available to all engineers and site developers prior to permit issuance
4D	Construction Site Inspection	Implement construction site inspection program with

	Program	monthly inspection of high priority land disturbance activities
5A	Municipal Storm Water Ordinance: Post Construction Runoff Control	Review and revise existing ordinances and regulations to eliminate contradictions and consolidate requirements
5B	Inspection and Reporting: Post Construction Activities	Implement post construction inspection procedures and develop data base for tracking, recording and reporting
5C	Manual for Post Construction BMP's: Erosion Prevention and Sediment Control	Publish manual and make copies available to all engineers and site developers prior to permit issuance
5D	Structural and Non- Structural strategies for Post Construction Runoff Control	Publish annual and make available to public property owners, developers and engineers
6A	Storm Water Quality (Standard Operating Procedures)	Review the process and revise as necessary
6B	Right of Ways and MS4 Maintenance Procedures	Review the process and revise as necessary
6C	Inspection and Maintenance of Public Drainage Infrastructure	Review the process and revise as necessary
6D	Employee Training and Education	Annual refresher training and updates

*Additional, significant activities planned for the next reporting cycle are noted below.*

Activity	Summary Description	Purpose
N / A	N / A	N / A

**B. Proposed changes to storm water management program**

Element 5.4.4 requires a report on proposed changes to your storm water management program, including changes to any BMPs or any identified measurable goals that apply to the program elements.

*Amended and replacement BMPs (if any) are reflected in Part I.A. and Part VIII, and in the above table and will not be repeated here. Additional, proposed changes are noted below.*

Change to Program	Summary Description	Rationale
-------------------	---------------------	-----------

N/A	N/A	N/A

## VI. Water Quality Controls for Discharges to Impaired Waterbodies (3.1.2)

The table below lists impaired waterbodies affected by discharges from this MS4, the pollutants of concern, and the two BMPs we believe to be the most significant in controlling discharges of these pollutants.

Stream Name	Pollutants	Priority BMP 1	Priority BMP 2
<i>Crooked Creek</i>	<i>Nitrogen loaded from farm livestock</i>	4C	4D
<i>Rutherford Creek</i>	<i>Sediment</i>	4C	4D
<i>Grassy Branch</i>	<i>Sediment</i>	4C	4D
<i>McCutcheon Creek</i>	<i>Sediment</i>	4C	4D

The table below lists impaired waterbodies for which the state has promulgated a TMDL. For the waterbodies indicated, we have complied with the requirements of the permit as noted by the check marks. [The table below includes two columns for two TMDLs. If additional space is needed, add additional table(s).]

	Waterbody Name/ Pollutant of Concern	Waterbody Name/ Pollutant of Concern
<b>Permit Requirement</b>		
3.1.3.1 Is the pollutant likely to be found in storm water discharges from the MS4?	None	None
3.1.3.2 Does the <u>TMDL</u> include a pollutant wasteload allocation, implementation recommendations, or other performance requirements specifically for storm water discharges from your MS4?	None	None
3.1.3.3 Does the TMDL address a flow regime likely to occur during periods of storm water discharge?	None	None
3.1.3.4 If the above three questions are true, does implementation of existing storm water control measures meet the TMDL provisions?	None	None

	<b>Waterbody Name/ Pollutant of Concern</b>	<b>Waterbody Name/ Pollutant of Concern</b>
<b>Permit Requirement</b>		
3.1.3.4-Or are additional control measures are necessary?	None	None
3.1.3.5 Current and planned control measures are documented.	None	None
3.1.3.6 Describe method to evaluate whether storm water controls are adequate to meet the requirements of the TMDL.	None	None
3.1.3.7 If additional or modified controls are necessary, describe the type and schedule for the control additions/revisions.	None	None

## VII. Protection of Listed Threatened or Endangered Species (3.2)

*We have followed the procedures given in section 3.2 of the Tennessee small MS4 general permit to ascertain whether or not storm water discharges from the MS4 are likely to jeopardize the continued existence of any species that are listed as endangered or threatened under the ESA, or result in the adverse modification or destruction of habitat that is designated as critical under the ESA (“critical habitat”). Below is a table indicating the procedures we have followed. We retain documentation of the evaluations and decisions reached through the evaluation.*

[See the permit at section 3.2 for more detailed list of evaluation criteria.]

Evaluation criteria	Yes/No	Notes
3.2.1.2.1 Criteria A: No endangered or threatened species or critical habitat in proximity to MS4 or the point where discharges reach the receiving water	No	None in Spring Hill
3.2.1.2.2 Criteria B: Formal or informal consultation with the Fish and Wildlife Service under Section 7 of the Endangered Species Act (ESA) has been concluded and that consultation addressed effects of storm water activities or resulted in a no jeopardy or not-likely-to-affect opinion.	Yes	Letter submitted to Fish and Wildlife Service for an informal consultation
3.2.1.2.3 Criteria C: Activities are authorized under Section 10 of the ESA	Yes	
3.2.1.2.4 Criteria D: Evaluated the effects of storm water discharges; we do not have reason to believe the discharge and discharge-related activities will jeopardize species or cause adverse modification or destruction of critical habitat.	Yes	Based on opinions of professional staff only, no significant changes to streams in past 12 months
3.2.1.2.5 Criteria E: Our storm water discharges and related activities are already addressed in another operator’s certification of eligibility. We agree to comply with conditions of that eligibility.	Yes	

Signed \_\_\_\_\_

Dated \_\_\_\_\_

Honorable Michael Dinwiddie, Mayor

Printed Name and Title

### VIII. Explanation of Amended or Replaced BMPs (from Part I)

The following table provides description(s) of BMPs and/or milestones we wish to amend this reporting year and subsequent years, as indicated. [Add tables as necessary.]

For every BMP that is being amended or replaced, provide the following information and analysis. The BMPs you describe here should match the ones you indicated as “Amended/Replaced” in Part I.A. of this annual report.

BMP Code: _____	BMP:
New BMP short title:	
New BMP description:	
BMP is being amended/replaced as:	Ineffective <input type="checkbox"/> Infeasible <input type="checkbox"/> See narrative. <input type="checkbox"/>
Expected effectiveness of new BMP:	
Why is the replacement BMP expected to achieve goals:	
BMP Milestone Year 1	
BMP Milestone Year 2	
BMP Milestone Year 3	
BMP Milestone Year 4	
BMP Milestone Year 5	
Narrative:	

BMP Code: _____	BMP:
New BMP short title:	
New BMP description:	
BMP is being amended/replaced as:	Ineffective <input type="checkbox"/> Infeasible <input type="checkbox"/> See narrative. <input type="checkbox"/>
Expected effectiveness of new BMP:	
Why is the replacement BMP expected to achieve goals:	
BMP Milestone Year 1	
BMP Milestone Year 2	
BMP Milestone Year 3	

BMP Milestone Year 4	
BMP Milestone Year 5	
Narrative:	

BMP Code: _____	BMP:
New BMP short title:	
New BMP description:	
BMP is being amended/replaced as:	Ineffective <input type="checkbox"/> Infeasible <input type="checkbox"/> See narrative. <input type="checkbox"/>
Expected effectiveness of new BMP:	
Why is the replacement BMP expected to achieve goals:	
BMP Milestone Year 1	
BMP Milestone Year 2	
BMP Milestone Year 3	
BMP Milestone Year 4	
BMP Milestone Year 5	
Narrative:	

BMP Code: _____	BMP:
New BMP short title:	
New BMP description:	
BMP is being amended/replaced as:	Ineffective <input type="checkbox"/> Infeasible <input type="checkbox"/> See narrative. <input type="checkbox"/>
Expected effectiveness of new BMP:	
Why is the replacement BMP expected to achieve goals:	
BMP Milestone Year 1	
BMP Milestone Year 2	
BMP Milestone Year 3	
BMP Milestone Year 4	
BMP Milestone Year 5	

Narrative:	
------------	--

Go to next page.

## IX. Tracking of measurable goals

For each of your BMPs, you should have established a measurable parameter, and goal in terms of that measurable parameter. Measurable parameters are ways to measure activities or effects of a BMP. The goal is the parameter value established as a target. If you are not yet measuring the parameter for a given BMP, indicate Not Applicable Yet (NAY) in the Result column.

BMP Code	BMP Title	Measurable parameter	Result	Goal
1A	Web Site – Public Education	Work with city IT staff to add storm water info to existing site	Current postings / updates are posted on site. Site is updated monthly	Done
1B	Public Education and Outreach Programs	Develop posters, mail-outs, newspaper articles and news letter	Quarterly News Letters/ News paper articles, tri-folds, flyers are posted at all public facilities. Events are held every month. Announcements are made at all Public Hearings	Done
1C	Hotline	Work with Storm Water Inspector to track and log calls	Posted on MS4 web site, Calls and complaints logged, Reports filed	Done
1D	Public Meetings	Prepare 2nd year annual report to TDEC and public hearing	Report completed, reviewed by Storm water Advisory Committee & BOMA	Done
2A	Storm Water Advisory Committee	Appoint committee and set regular meetings	Committee formed, meetings held monthly	Done
2B	Storm Water Administrative Board	Appoint members and set regular meetings	Appointments made, meeting held quarterly / special call meetings for scheduled appeal hearings. All appointment letters are updated.	Done

<b>BMP Code</b>	<b>BMP Title</b>	<b>Measurable parameter</b>	<b>Result</b>	<b>Goal</b>
2C	Public Meetings	Conduct public meeting to review annual report and hear public comments	Annul repot to be reviewed by BOMA	Done
2D	Citizen Action Groups	Stream Clean-up Day	Monthly events are conducted. Tree plantings, Stream bank restorations, Stream clean-ups are conducted involving Elected Officials, Local Schools, Boy Scouts, Girl Scouts, Residents and TEC.	Done
3A	Municipal Storm Water Ordinance(Prohibit illicit discharges)	Advisory Committee to develop draft ordinance	Ordinance passed on 19 November 2007	Done
3B	Dry Weather Screening / Inspections	Set up screening procedures, develop inspection report forms, train personnel, set up tracking mechanism	All report formats in place, Site inspections, Illicit Discharge, Illegal Dumping, Good Housekeeping Post Construction & Storm Drainage System Inspections. Dry weather screening is 100 % completed on all current sites.	Done
3C	Hot Line and Complaint Tracking System	Set up procedures for receiving and tracking calls	Hot Line established and posted on web page and news letter	Done
3D	Storm Water System Inventory and Map	Develop mapping plan, outfall identifying system and collected inventory forms and database designed	Currently data being currently gathered on all storm drainage components all sites	Done
4A	Municipal Storm Water Ordinance: Construction Site Runoff Control Program	Advisory Committee to develop draft ordinance	Ordinance 07-45 passed on 19 November 2007	Done

<b>BMP Code</b>	<b>BMP Title</b>	<b>Measurable parameter</b>	<b>Result</b>	<b>Goal</b>
4B	Review Permitting Process	Advisory Committee to develop draft procedures to be included in Municipal Storm Water Ordinance	Ordinance 07-45 passed on 19 November 2007	Done
4C	Manual for Erosion Prevention and Sediment Control	Review existing publications TDEC, EPA, TAV, COE for applicable BMP's	BMP handbook issued at all MS4 pre-cons	Done
4D	Construction Site Inspections	Develop construction site inspection program with report forms, check list and record keeping methods	All active sites are inspected (1) a month as required, all reports in file with photos	Done
5A	Municipal Storm Water Ordinance :Post Construction Runoff Control	Advisory Committee to develop draft ordinance	Ordinance 07-45 passed on November 19 2007	Done
5B	Inspection and Reporting :Post Construction Activities	Advisory Committee to develop draft procedures for post construction inspections	Post Construction Inspections currently being conducted	Done
5C	Manual for Post Construction BMP's: Erosion Prevention and Sediment Control	Review existing publications TDEC, EPA, TVA, COE for applicable BMP's	Review conducted semi-annually	Done
5D	Structural and Non-Structural strategies for Post Construction Runoff Control	Manual developed for administrative requirements for structural maintenance for post construction BMP's	Manual developed	Done
6A	Storm Water Quality ( Standard Operating Procedures)	Set up in- house committee with representative of all affected departments	Committee includes Public Works Deputy Dir. And GSI Department Head	Done
6B	Right of Ways and MS4 Maintenance Procedures	Develop a typical storm water pollution prevention program for areas selected for maintenance efforts	Areas have been designated for routine maintenance	Done
6C	Inspection and Maintenance of Public Drainage Infrastructure	Develop a typical storm water pollution prevention program for infrastructure selected maintenance efforts	Storm drainage systems are inspected during infrastructure and final walk through inspections. Built-out subdivisions have been inspected	

<b>BMP Code</b>	<b>BMP Title</b>	<b>Measurable parameter</b>	<b>Result</b>	<b>Goal</b>
6D	Employee Training Education	Develop training Program using in house committee	Annual Training for all City personnel is conducted annually to include Good Housekeeping Operations and Illicit Discharge Detection	Done

## Footnotes

---

<sup>1</sup> *Maximum extent practicable* (MEP) is the statutory standard that establishes the level of pollutant reductions that operators of regulated MS4s must achieve. The CWA requires that NPDES permits for discharges from MS4s “shall require controls to reduce the discharge of pollutants to the maximum extent practicable, including management practices, control techniques and system, design and engineering methods.” CWA 402(p)(3)(B)(iii).

<sup>2</sup> Insert the number of BMPs listed in your NOI, as updated by subsequent annual reports. Example: if each minimum measure has five BMPs associated with it, you would insert [30] as the number of BMPs. [6 X 5]

<sup>3</sup> Insert the number of Year 4 milestones accomplished. For example, if 27 Year 4 milestones are accomplished at the end of Year 4, then you would insert [27 of 30] in these brackets.