



Tennessee Department of Environment and Conservation  
 Division of Water Pollution Control  
 Enforcement and Compliance Section  
 L&C Annex, 6<sup>th</sup> Floor, 401 Church Street  
 Nashville, TN 37243  
 (615) 532-0625

**Small Municipal Separate Storm Sewer System (MS4) Annual Report**

**1. MS4 INFORMATION**

City of Brentwood

Name of MS4

Todd Spangler

Name of Contact Person

(615) 371-0080

Telephone (including area code)

P.O. Box 788

Mailing Address

Brentwood TN 37024

City State ZIP code

What is the current population of your MS4? 35262

What is the reporting period for this annual report? From 7/1/10 to 6/30/11

**2. PROTECTION OF STATE OR FEDERALLY LISTED SPECIES**

A. Are any of the MS4 discharges or discharge-related activities likely to jeopardize any state or federally listed species (**Part 3, Special Conditions, General Permit for Phase II MS4s**)  Yes  No

B. Please attach the determination of the effect of the MS4 discharges on state or federally listed species per sub-part 3.2.1

**3. WATER QUALITY PRIORITIES**

A. Does your MS4 discharge to waters listed as impaired on the state 303(d) list?  Yes  No

B. If yes, identify each impaired water, the impairment cause(s), whether a TMDL has been approved by EPA for each, and whether the TMDL identifies your MS4 as a source of the impairment.

Waterbody I.D. #	Cause/TMDL Priority	Approved TMDL		MS4 Assigned to WLA	
Owl Creek & Tribs	Sedimentation	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Holt Creek	Sedimentation	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Beech Creek & Spencer Creek	Sedimentation	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

C. What specific sources of these pollutants of concern are you targeting? Construction Disturbance

D. Do you have discharges to any Exceptional TN Waters (ETWs) or Outstanding National Resource Waters (ONRWs)?  Yes  No

E. Are you implementing additional specific provisions to ensure the continued integrity of ETWs or ONRWS located within your jurisdiction?  Yes  No

**4. PUBLIC EDUCATION AND PUBLIC PARTICIPATION**

A. Is your public education program targeting specific pollutants and sources of those pollutants?  Yes  No

B. If yes, what are the specific causes, sources and/or pollutants addressed by your public education program? Residential impacts, to include car washing and maintenance, yard fertilizers, animal and yard waste.

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C. Note specific successful outcome(s) (NOT tasks, events, publications) fully or partially attributable to your public education program during this reporting period. None

D. Do you have an advisory committee or other body comprised of the public and other stakeholders that provides regular input on your stormwater program?  Yes  No

E. Provide a summary of all public meetings required by the permit. Public Hearing for Annual Report

### 5. CODES AND ORDINANCES REVIEW AND UPDATE

A. Is a completed copy of the EPA Water Quality Scorecard submitted with this report?  Yes  No

B. Include status of implementation of code, ordinance and/or policy revisions associated with permanent stormwater management. Ordinance revisions completed June 2011

### 6. CONSTRUCTION

A. Do you have an ordinance or adopted policies stipulating:

Erosion and sediment control requirements?  Yes  No

Other construction waste control requirements?  Yes  No

Requirement to submit construction plans for review?  Yes  No

MS4 enforcement authority?  Yes  No

B. How many active construction sites disturbing at least one acre were there in your jurisdiction this reporting period? 11

C. How many of these active sites did you inspect this reporting period? All

D. On average, how many times each, or with what frequency, were these sites inspected (e.g., weekly, monthly, etc.)? Monthly and after storm events

E. Do you prioritize certain construction sites for more frequent inspections?  Yes  No  
If Yes, based on what criteria? Based on priority watershed to impaired waters or critical habitat

### 7. ILLICIT DISCHARGE ELIMINATION

A. Have you completed a map of all outfalls and receiving waters of your storm sewer system?  Yes  No

B. Have you completed a map of all storm drain pipes of storm sewer system?  Yes  No

C. How many outfalls have you identified in your system? 327

D. How many of these outfalls have been screened for dry weather discharges? 327

E. How many of these have been screened more than once? 0

F. What is your frequency for screening outfalls for illicit discharges? ongoing daily by City staff during normal duties

G. Do you have an ordinance that effectively prohibits illicit discharges?  Yes  No

H. During this reporting period, how many illicit discharges/illegal connections have you discovered (or been reported to you)? 4

I. Of those illicit discharges/illegal connections that have been discovered or reported, how many have been eliminated? 3, One has been determined to be contaminated groundwater and has been turned over to Division of Groundwater Protection. One was an encroachment in a WNA and proper approval was obtained after contact. The third was concrete or paint dumped into a catch basin, this was discovered after the action and no responsible party was found. No further dumping was observed. The one not eliminated is white substance in a stream originating from Metro, Metro has been notified and are currently source tracking in an effort to determine the source.

### 8. STORMWATER MANAGEMENT FOR MUNICIPAL OPERATIONS

A. Have stormwater pollution prevention plans (or an equivalent plan) been developed for:

All parks, ball fields and other recreational facilities  Yes  No

All municipal turf grass/landscape management activities  Yes  No

All municipal vehicle fueling, operation and maintenance activities  Yes  No

All municipal maintenance yards  Yes  No

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- All municipal waste handling and disposal areas  Yes  No
- B. Are stormwater inspections conducted at these facilities?  Yes  No
1. If Yes, at what frequency are inspections conducted? Annually
- C. Have standard operating procedures or BMPs been developed for all MS4 field activities? (e.g., road repairs, catch basin cleaning, landscape management, etc.)  Yes  No
- D. Do you have a prioritization system for storm sewer system and permanent BMP inspections?  Yes  No
- E. On average, how frequently are catch basins and other inline treatment systems inspected? Three times per year
- F. On average, how frequently are catch basins and other inline treatment systems cleaned out/maintained? As needed approximately 360 work orders were completed regarding storm drainage system maintenance.
- G. Do municipal employees in all relevant positions and departments receive comprehensive training on stormwater management?  Yes  No
- H. If yes, do you also provide regular updates and refreshers?  Yes  No
- If so, how frequently and/or under what circumstances? Annually
- 9 PERMANENT STORMWATER CONTROLS**
- A. Do you have an ordinance or other mechanism to require:
- Site plan reviews of all new and re-development projects?  Yes  No
- Maintenance of stormwater management controls?  Yes  No
- Retrofitting of existing BMPs with green infrastructure BMPs?  Yes  No
- B. What is the threshold for new/redevelopment stormwater plan review? (e.g., all projects, projects disturbing greater than one acre, etc.) All new or redevelopment
- C. Have you implemented and enforced performance standards for permanent stormwater controls?  Yes  No
- D. Do these performance standards go beyond the requirements found in paragraph 4.2.5.2 and require that pre-development hydrology be met for:
- Flow volumes  Yes  No
- Peak discharge rates  Yes  No
- Discharge frequency  Yes  No
- Flow duration  Yes  No
- E. Please provide the URL/reference where all permanent stormwater management standards can be found.  
<http://library.municode.com/index.aspx?clientId=12774&stateId=42&stateName=Tennessee>
- F. How many development and redevelopment project plans were reviewed for this reporting period? 11
- G. How many development and redevelopment project plans were approved? 11
- H. How many permanent stormwater management practices/facilities were inspected? 0 - Biannual inspections completed year before
- I. How many were found to have inadequate maintenance? 0
- J. Of those, how many were notified and remedied within 30 days? (If window is different than 30 days, please specify) 0
- K. How many enforcement actions were taken that address inadequate maintenance? 0
- L. Do you use an electronic tool (e.g., GIS, database, spreadsheet) to track post-construction BMPs, inspections and maintenance?  Yes  No

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- M. Do all municipal departments and/or staff (as relevant) have access to this tracking system?  Yes  No
- N. Has the MS4 developed a program to allow for incentive standards for redeveloped sites?  Yes  No
- O. How many maintenance agreements has the MS4 approved during the reporting period? 0 - Requirement not in place until July 2011

### 10. ENFORCEMENT

- A. Identify which of the following types of enforcement actions you used during the reporting period, indicate the number of actions, the minimum measure (e.g., construction, illicit discharge, permanent stormwater control) or note those for which you do not have authority:

Action	Construction	Permanent Stormwater Controls	Illicit Discharge	Authority?
Notice of violation	# <u>0</u>	# <u>0</u>	# <u>0</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Administrative fines	# <u>0</u>	# <u>0</u>	# <u>0</u>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Stop Work Orders	# <u>0</u>	# <u>0</u>	# <u>0</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Civil penalties	# <u>0</u>	# <u>0</u>	# <u>0</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Criminal actions	# <u>0</u>	# <u>0</u>	# <u>0</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Administrative orders	# <u>0</u>	# <u>0</u>	# <u>0</u>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Other _____	# _____	# _____	# _____	

- B. Do you use an electronic tool (e.g., GIS, data base, spreadsheet) to track the locations, inspection results, and enforcement actions in your jurisdiction?  Yes  No
- C. What are the 3 most common types of violations documented during this reporting period? 1. Material dumping into storm drains - all violators were unable to be determined. 2. Construction within a WNA, 3. improper erosion control resulting in material in the street. This is most commonly enforced through verbal communication which has been found to be most effective and timely.

### 11. PROGRAM RESOURCES

- A. What was your annual expenditure to implement the requirements of your MS4 NPDES permit and SWMP this past reporting period? 207,400
- B. What is next year's budget for implementing the requirements of your MS4 NPDES permit and SWMP? 207,400
- C. Do you have an independent financing mechanism for your stormwater program?  Yes  No
- D. If so, what is it/are they (e.g., stormwater fees), and what is the annual revenue derived from this mechanism?  
 Source: \_\_\_\_\_ Amount \$ \_\_\_\_\_  
 Source: \_\_\_\_\_ Amount \$ \_\_\_\_\_
- E. How many full time employees does your municipality devote to the stormwater program (specifically for implementing the stormwater program vs. municipal employees with other primary responsibilities that dovetail with stormwater issues)? 1, Todd Spangler is primarily responsible as a portion of his job description
- F. Do you share program implementation responsibilities with any other entities?  Yes  No

Entity	Activity/Task/Responsibility	Your Oversight/Accountability Mechanism
Engineering	review, inspection, Enforcement, and implementation of program	Authority by designation of responsibility
Public Works	Drainage system maintenance	Authority by designation of responsibility
GIS	System mapping	Authority by designation of responsibility
Parks	Stream bank revitalization	Authority by designation of responsibility

### 12. EVALUATING/MEASURING PROGRESS

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- A. What indicators do you use to evaluate the overall effectiveness of your Stormwater Management Program, how long have you been tracking them, and at what frequency? Note that these are not measurable goals for individual BMPs or tasks, but large-scale or long-term metrics for the overall program, such as in-stream macroinvertebrate community indices, measures of effective impervious cover in the watershed, indicators of in-stream hydrologic stability, etc.

Indicator	Began Tracking (year)	Frequency	Number of Locations
Example: E. coli	2003	Weekly April–September	20
Complaint tracking	2006	on going	City wide
Illicit Discharge Monitoring	2006	on going, daily	City wide

- B. Provide a summary of data (e.g., water quality information, performance data, modeling) collected in order to evaluate the performance of permanent stormwater controls installed throughout the system. This evaluation may include a comparison of current and past permanent stormwater control practices. None completed , Future sampling as required by the permit will be completed.

### 13. STORMWATER MANAGEMENT PROGRAM UPDATE

- A. Describe any changes to the MS4 program during the reporting period including but not limited to:

Changes adding (but not subtracting or replacing) components, controls or other requirements per **paragraph 4.4.2.a of the permit.** Change BMP 1-C to eliminate the use of TAB for PSA's. All PSA's will be run on the City's own channel 19 and on the City's Website.

Changes to replace an ineffective or unfeasible BMP **per paragraph 4.4.2.b of the permit.** None

Information (e.g. additional acreage, outfalls, BMPs) on program area expansion based on annexation or newly urbanized areas. None

Changes to the program as required by the division. Clarification as to procedure for work within a stream in storm water program documentation and permit required revisions to the waterway beffer, ES&C requirements, permanent stormwater infiltration and reuse, creation of a maintenance agreement requirement, and administrative penalty program.

### 14. CERTIFICATION

**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.”

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

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

**Annual reports must be submitted in accordance with the requirements of subpart 5.4. (Reporting) of the permit. Annual reports must be submitted to the appropriate Environmental Field Office (EFO) by September 30 of each calendar year, as shown in the table below:**

EFO	Street Address	City	Zip Code	Telephone
Chattanooga	540 McCallie Avenue STE 550	Chattanooga	37402	(423) 634-5745
Columbia	1421 Hampshire Pike	Columbia	38401	(931) 380-3371
Cookeville	1221 South Willow Ave.	Cookeville	38506	(931) 432-4015
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