

**PHASE II
STORMWATER
PERMIT NOTICE OF
INTENT (NOI)**

NOI



Tennessee Department of Environment and Conservation
 Division of Water Resources
 William R. Snodgrass Tennessee Tower
 312 Rosa L. Parks Avenue, 11th Floor, Nashville, Tennessee 37243
Phase II Stormwater Permit Notice of Intent (NOI)
 Phase II Municipal Separate Storm Sewer Systems (MS4)

PURPOSE

The purpose of this Notice of Intent (NOI) is for a Tennessee city, county, utility district, university or military base to apply for NPDES permit to discharge stormwater runoff from a Phase II municipal separate storm sewer system.

INSTRUCTIONS

You must provide the following information to the Division of Water Pollution Control as application material. You may either submit a hard copy of the original NOI as described in sub-part 2.3 of the MS4 Permit, signed in accordance with the signatory requirements of sub-part 6.7 of the permit, and a copy of the NOI, to the address shown in sub-part 1.2 of the permit for the EFO responsible for the county where the facility is located; or you may submit by e-mail, with the completed NOI and attachments (such as map and city ordinances) to phase.two@tn.gov.

In addition, send an original, hard copy letter, signed by the responsible official of the MS4, which makes reference to the e-mail transmission including date and time that the electronic submitted was made. The letter must contain the signatory statement found on the NOI form. The letter must be mailed to the Nashville Central Office address as defined in sub-part 1.2 of the MS4 permit.

After completing the questions in each section, list the Best Management Practices (BMPs) that you will implement in each area based on a set of priorities you have identified in the area. Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

After completing the BMP's in each section provide the administrative information to complete those BMP's as explained here:

Primary Contact and Position/Title	The person in your organization serving as the primary contact.
Other Department and Roles	Other departments within your organization involved in the project and how their role is identified.
Other Government Entity and Roles	Identification of other government entities responsible for implementing one or more of the BMP's. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.
Other Institutions and Roles	Identification of partnerships with another MS4 operator or institution (e.g., Chamber of Commerce, environmental interest organizations, civic groups) to achieve the BMP's.
Target Groups (if applicable)	Specific kinds of groups that will be targeted, such as service industries (i.e., carpet cleaning), civic groups, schools, and church groups, etc.

PART I ADMINISTRATIVE INFORMATION

Name of city, county, stormwater utility district or other public institution that operates a Phase II MS4: Oak Ridge

Latitude (dd.dddd): 36.0122 Longitude (dd.dddd): -84.2581 (Municipal Building, Appendix "B")

Please include a lat-long of a representative location within your corporate boundaries for mapping purposes.

Mark S. Watson	City Manager
Responsible Elected Official or Officer	Title
200 South Tulane Ave, PO Box 1	Oak Ridge
Street Address	City
TN	37830
State	Zip Code

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PROGRAM CONTACT
Steven R. Byrd, P.E.
Name <u>sbyrd@oakridgetn.gov</u>
Email Address <u>865-425-1807</u>
Phone Number

TECHNICAL CONTACT
Steven R. Byrd, P.E.
Name <u>sbyrd@oakridgetn.gov</u>
Email Address <u>865-425-1807</u>
Phone Number

Attach an organizational chart that shows the different departments involved in stormwater management. See Appendix "A"

**PART II
DESCRIPTION OF STORM SYSTEM**

**ITEM A
AREA SERVED (IN SQUARE MILES)**

If city, town, university, or utility district: Give jurisdiction area within current corporate boundaries 92 (See Appendix "B")

Comment: See Appendix "B" that shows 38 square miles in the Oak Ridge jurisdiction and 52 square miles in the Department of Energy (DOE) jurisdiction. The DOE property presently has stormwater coverage under three separate permits as listed on the Appendix "B" map. The NOI of Oak Ridge does not address the DOE property covered under existing permits.

If city, town, university, or utility district: Give additional area of urban growth boundary 8.57

If county: Give total area Area unincorporated Unincorporated, urbanized area (UA)

Entire county (unincorporated) <input type="checkbox"/>	Non-UA portions, as follows (describe below) <input type="checkbox"/>
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**ITEM B
STORM DRAINAGE INFRASTRUCTURE**

Give figures for the following features of stormwater drainage infrastructure owned or operated by the local government. For a county government, indicate whether the figures represent the entire county or only the urbanized area. Figures for length and number of culverts and catch basins may be rough estimates.

For counties: Entire county Urbanized area only

Storm Sewers	<u>120 mi. (miles, or feet)</u>	Open Ditches	<u>5.3 mi. (miles, or feet)</u>
Culverts	<u>2.2 mi.</u>	Catch Basins	<u>2,750</u>
Retention Basins	<u>1</u>	Detention Basins	<u>9</u>

**ITEM C
MAPS**

Please include a map or maps depicting the following information. A single map may be submitted, as long as the information is legible. If you are not able to provide all the information please mark the applicable check box and attach an explanation as to why the information has not been submitted:

	Appendix		Appendix
Zoned areas for commercial or industrial activity	<input checked="" type="checkbox"/>	State vocational, technical, college or universities	<input checked="" type="checkbox"/>
Actual areas of commercial or industrial activity	<input checked="" type="checkbox"/>	Federal vocational, technical, college or universities	<input type="checkbox"/>
Other municipally owned/operated industrial activities	<input type="checkbox"/>	City Roads	<input checked="" type="checkbox"/>
Municipal or County Wastewater Treatment Plants	<input checked="" type="checkbox"/>	County Roads	<input type="checkbox"/>
Vehicle Fleet Maintenance Centers	<input checked="" type="checkbox"/>	Perennial and intermittent streams	<input checked="" type="checkbox"/>
Power Plants	<input type="checkbox"/>	Topography or Drainage Patterns	<input checked="" type="checkbox"/>
Airports	<input type="checkbox"/>	Landfills	<input checked="" type="checkbox"/>
Military Installations	<input type="checkbox"/>		

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**ITEM D
IDENTIFYING IMPAIRED STREAMS AND OTHER WATER BODIES**

Using the GIS mapping tool (<http://tnmap.tn.gov/wpc/>) along with the most current 303(d) list published on the division's web site: http://www.tn.gov/environment/water/water-quality_publications.shtml

, identify whether stormwater discharges from any part of the MS4 contribute pollutants of concern to an impaired waterbody and list below: For any impairment, indicate the waterbody ID#, name of impacted waterbody, nature of pollution (cause), and the source. If you have additional streams to list, please include in a separate attachment.

WATERBODY ID# AND NAME OF IMPACTED WATERBODY	CAUSE OF IMPAIRMENT	SOURCE OF IMPAIRMENT
East Fork Poplar Creek (Roane Co), TN06010207026-1000	PCBs, Mercury, E. coli, NO2 + NO3, Total P, Siltation	US Dept of Energy Releases, Oak Ridge Area
East Fork Poplar Creek (Anderson & Roane Co), TN06010207026-2000	PCBs, Mercury, E. coli, NO2 + NO3, Total P, Siltation, Habitat Alterations	US Dept of Energy Releases, Oak Ridge Area
Ernies Creek, TN06010207006T-1100	E. coli	Municipal (Urbanized High Density Area)
Melton Hill Reservoir, TN06010207006-1000	PCBs, Chlordane	Contaminated Sediment Deposits
Scarboro Creek, TN6010207006T-0900	E. coli	Municipal (Urbanized High Density Area)
Poplar Creek, TN06010207020-1000	NO2 + NO3, Total P	Municipal (Urbanized High Density Area), and Sanitary Sewer Overflows
Poplar Creek Embayment, TN06010207001-0100	Mercury, PCBs	Contaminated Sediments (Mercury & PCBs), Industrial Point Source Discharge (Mercury)
Mitchell Branch, TN06010207020-1300	Hexavalent Chromium, Substrate Habitat Alteration, PCBs	CERCLA NPL Sites (Chromium, PCBs) Channelization (Substrate)
White Oak Creek, TN06010207247-1000	Cesium, Strontium	CERCLA NPL Sites

Comment: The DOE is covered under 3 separate permits and is a source of some of the known pollutants.

**ITEM E
HAS THE STATE OR EPA ISSUED A TMDL FOR ANY STREAMS DIRECTLY AFFECTED BY RUNOFF FROM YOUR MS4?**

Determine whether or not a TMDL has been established and approved by EPA and identify by checking the appropriate box. A list of EPA-Approved TMDLs as well as EPA-Established TMDLs for Tennessee waters can be found on the division's web site: http://www.tn.gov/environment/water/water-quality_total-daily-maximum-loads.shtml.

Yes No If yes, list the waterbody ID#, name of impacted waterbody and parameter(s) of concern:

WATERBODY ID# AND NAME OF IMPACTED WATERBODY	PARAMETERS OF CONCERN
Lower Clinch Watershed, HUC 06010207	Pathogens (2005), Siltation & Habitat Alteration (2006, 2007), PCBs & Chlordane (2010)
East Fork Poplar Creek, TN06010207026-1000 & 2000	Pathogens (2005), Siltation & Habitat Alteration (2006, 2007)
Melton Hill Reservoir, 06010207006-1000	Pathogens (2005), Siltation & Habitat Alterations (2006, 2007), PCBs & Chlordane (2010)
Watts Bar Reservoir, 06010207006-1000	Pathogens (2005), Siltation & Habitat Alteration (2006, 2007), PCBs & Chlordane (2010)

If you have additional streams to list, please include in a separate attachment.

Comment: The City's SWMP will address the requirements of the general permit for discharges to water quality impaired waters (Section 3.1), protection of state or federally listed species (Section 3.2), analytical & non-analytical monitoring of impaired streams (Section 5.1 & 5.2)

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PART III
EXISTING LEGAL AUTHORITY TO CONTROL STORMWATER DISCHARGES TO MS4

You must review ordinances that are associated with stormwater discharges to your MS4. Attach a copy of ordinances that give your MS4 the authority to control stormwater discharges into the MS4 storm sewer system. Ordinances that deal with stormwater issues might be found, for example, in conjunction with litter control, prohibition of dumping, clean up of spills, grading/building permits, sewer connection ordinances, erosion and sediment practices, subdivision regulations or other land use/development ordinances.

See Appendix "F"

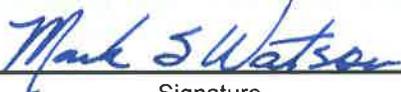
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PART IV
SIGNATURE OF RESPONSIBLE CORPORATE OFFICER

This Notice of Intent (NOI) must be signed as follows: For a municipality, state, federal, other public agency, and/or co-permittees by either a principal executive officer or ranking elected official. For purposes of this section, a principal executive officer of a Federal agency includes one of the following:

- i. The chief executive officer of the agency.
- ii. A senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., Regional Administrators of EPA).

I certify under penalty of law that this document and all attachments were prepared by me, or under my direction or supervision. The submitted information 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. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

 _____ Signature	City Manager _____ Title/Municipality	2/25/14 _____ Date
_____ Signature	_____ Title/Municipality	_____ Date

(Go to next page.)

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**PART V
YOUR PROPOSED STORMWATER QUALITY MANAGEMENT PROGRAM**

This NOI requires you to provide a brief description of your current and proposed activities as well as your Best Management Practices (BMPs) for a stormwater management program. The following sections correspond to the six minimum control measures for a Phase II stormwater management program. If another MS4 will be responsible for implementing any or all portions of any or all following six minimum measures, then attach either the interlocutory agreement or the proposed agreement and schedule for adoption. You must still complete this NOI by answering the relevant questions for the six following measures. For purposes of this NOI, the Public Education and Outreach and Public Participation and Involvement minimum measures have been combined.

**SECTION 1
PUBLIC EDUCATION AND OUTREACH AND PUBLIC INVOLVEMENT/PARTICIPATION**

A. Current Activities:

The following is a set of questions on your current Public Education and Outreach and Public Involvement/Participation. These questions are intended to highlight minimum program requirements under the MS4 permit. For MS4s who have not been previously covered under an MS4 permit, each element not currently performed must be implemented by the dates identified in Sub-part 4.1.1. of the permit. Thus, each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

1. Does the municipality currently distribute educational materials on the topics of stormwater quality, stream water quality, pollution impacts, pollution prevention, etc.? If yes, briefly describe the materials, including media used (e.g., written brochures, public service announcements, etc.); the topic(s) covered, intended target audience(s), and the distribution method.

Yes
No

Comment: In 2002 the City established a Stormwater Management Program website available for public review. General information is provided on the NPDES MS4 required program. Updates on the website have been minimal due to the City not being officially designated as a MS4 City.

2. Does the municipality currently conduct or participate in public outreach activities focusing on the topics of stormwater quality, stream water quality, pollution impacts, pollution prevention, etc.? If yes, briefly describe the outreach activities, topic(s) covered, intended target audience(s), and the frequency of activities.

Yes
No

[Empty box for description]

3. Does the current municipal stormwater management program comply with Local, State and Federal public notice requirements? If yes, describe how the public is notified.

Yes
No

Comment: Public notices for some elements of the current program comply with local and state requirements (construction permitting of 1 acre or more, Floodplain Zoning Ordinance, ARAP). Changes to existing or proposed ordinances have a public notice process through City Council meetings.

B. Proposed Activities:

List the BMPs that you will implement in the areas of Public Education and Outreach and Public Participation and Involvement. These should be based on a set of priorities that you have identified in the areas of Public Education and Outreach and Public Participation and Involvement. Provide a short descriptive name to the BMP in the left column. In the right column, more fully describe the BMP.

For Public Participation and Involvement BMPs, you may not desire to dictate the ways in which the public participates or is involved in the stormwater quality management program; in this case, your proposed program should provide a forum and a structure by which to encourage or allow the public to participate. On the other hand, there may be specific ways you do want the public to be involved, based on your program needs. For instance, you may want stream watch groups to be organized. As such, your proposed program should describe how you will accomplish this, and the time schedule.

PROPOSED BEST MANAGEMENT PRACTICES FOR PUBLIC EDUCATION AND PUBLIC PARTICIPATION		
BMP	Name	DESCRIPTION
1A.	Stormwater Program Website	Public communication through updates on existing City website page on stormwater program.
1B.	Literature Distribution	Distribute literature to the public that describes the stormwater program and its benefits.
1C.	Public Service announcements	Use public service announcements on the local TV channel to educate and keep the public updated on the stormwater program.
1D.	School Contest	Consider a school contest and/or project for school aged children on stormwater related issues.
1E.	Catch Basin Stenciling	Develop a stormwater requirement for manufacture stenciling of new and replacement junction box lids and catch basin grates.
1F.	Stormwater Hotline	Set up a citizen hotline and complaint tracking system for the receipt of public input and concerns.
1G.	PIE Plan	Develop a Public Information and Education Plan (PIE).

If you have additional BMPs to list, please include in a separate attachment.

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What specific groups will be targeted (e.g., service industries such as carpet cleaning, lawn care, civic groups, schools, church groups) if applicable:

General public, schools, churches, businesses, contractors, developers and community groups

C. Measurable Goals and Implementation Milestones

Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

D. Administrative Information

ADMINISTRATIVE INFORMATION FOR PUBLIC EDUCATION AND PUBLIC PARTICIPATION	
PRIMARY CONTACT	POSITION OR TITLE
Steven R. Byrd, P.E.	Public Works Department Oak Ridge City Engineer

Identify other Department(s) that will be involved and their role.

OTHER DEPARTMENT(S)	ROLE
Information Services	City website stormwater page, public service announcements, GIS stormwater mapping and INFOR Asset management system.
Community Development Department	GIS land use mapping, general public interface, code enforcement
Schools	School student participation in water quality issues

Identify if you will partner with another MS4 Operator, or with another institution (e.g. Chamber of Commerce, Environmental interest organizations, civic groups) in order to carry out the chosen BMPs.

ENTITY	BMP
Oak Ridge Schools	Student contests
Community groups/local TV/scouts, etc.	Distribution of educational material.

Will another governmental entity be responsible for implementing one or more chosen BMPs? If so, identify the entity and which BMP(s) it will implement. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.

ENTITY	BMP
N/A	

**SECTION 2
ILLICIT DISCHARGE DETECTION AND ELIMINATION**

The following are common sources of illicit discharges to an MS4:

- Sanitary Wastewater
- Effluent from septic tanks
- Car wash wastewaters
- Improper oil disposal
- Radiator flushing disposal
- Laundry Wastewaters/gray water
- Spills from roadway accidents
- Improper disposal of auto and household toxics
- Carpet cleaning wastewaters

A. Current Activities

The following is a set of questions on your current Illicit Discharge Detection and Elimination Program. These questions are intended to highlight minimum program requirements under the MS4 permit. For MS4s who have not been previously covered under an MS4 permit, each element not currently performed must be implemented by the dates identified in Sub-part 4.1.1. of the permit. Thus, each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

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STORM SEWER SYSTEM MAP

Does the municipality currently have a storm sewer system map completed for the entire regulated municipal separate storm sewer system? The map must depict, at a minimum: city streets, topography or drainage patterns, streams, and outfalls (points where the city or county-operated MS4 discharges into the streams or adjacent MS4s).

Yes No

Comment: The City presently has a CADD as-built storm water map for most of the City. Most drainage pipes and swales are identified with slopes, distances and type of material. The City has GIS mapping that is used for land use and sanitary sewer mapping and will also be used for future stormwater mapping.

ILLICIT DISCHARGE ORDINANCES

1. Does the municipality currently have an ordinance or regulatory mechanism that prohibits non-stormwater discharges into the storm sewer system? If yes, please attach a copy of the ordinance and give page number(s) of this section of ordinance. If No, proceed to the next section (inspections and enforcement).

Yes No Page Number _____ Ordinance Section Number _____

Comment: The City does not currently have an ordinance or regulatory mechanism that explicitly deals with non-stormwater discharge in the storm sewer collection system. We do have a Sewer Use Ordinance that makes it illegal to deposit or discharge objectionable waste in such a manner to create a public nuisance or to create a threat or danger to public health and safety (page 18-19 of enclosed Sewer Use Ordinance). No procedure is in place to the scope of what the MS4 program requires.

2. Does the ordinance or regulatory mechanism clearly define non-stormwater discharges, either through a written description of a non-stormwater discharge or through a listing of unallowable or allowable non-stormwater discharges?

Yes No

3. Does the ordinance or regulatory mechanism allow right-of-entry on private property for inspection of suspected discharges?

Yes No

4. Does the ordinance or regulatory mechanism prohibit dumping?

Yes No

5. Does the ordinance or regulatory mechanism give the MS4 owner/operator the authority to eliminate non-stormwater discharges in the event of violations? If yes, please note page number and paragraph number.

Yes No Page Number _____ Paragraph Number _____

6. Does the ordinance or regulatory mechanism define penalties for violations? If yes, please note maximum penalty, page number and paragraph number.

Yes No Maximum Penalty _____ Page Number _____ Paragraph Number _____

7. Does the municipality have ordinance or other regulatory mechanism that prohibits contamination of stormwater runoff from "hot spots" including industrial and commercial properties, restaurants, auto repair shops, auto supply shops, and large commercial parking areas?

Yes No

INSPECTION/SCREENING AND ENFORCEMENT PROCEDURES

1. Does the municipality presently have personnel and procedures in place for inspection and/or screening for non-stormwater discharges? If yes, please describe and indicate percentage of system inspected and/or screened.

Yes
No

2. Does the municipality presently have procedures and personnel in place for enforcement of violations of the illicit discharge ordinance? If yes, please describe.

Yes
No

3. How are enforcement actions documented?

Not Documented

4. Has the municipality defined "hot spots" for non-stormwater discharge screening and inspections? If yes, please describe and provide a map of illicit discharge screening hot spots.

Yes
No

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PUBLIC INPUT AND
COMPLAINTS

1. Does the municipality presently have procedures in place to receive and consider information and complaints about non-stormwater discharges that are submitted by the public? If so, provide brief description: responsible departments, personnel, steps followed.

Yes Comment: The City receives and considers information and complaints about non-stormwater discharges by e-mails and/or phone calls through several City departments. This information is provided to the City Environmental & Regulatory Compliance Coordinator for investigations. Questionable illicit discharges are referred to the TDEC Knoxville Office. No procedure is in place to the scope of what the MS4 program requires.

No

EDUCATION

1. Has the municipality educated the public and businesses including auto parts supply, auto repair shop and restaurants, regarding ways to detect, prevent and eliminate illicit discharges? If yes, briefly describe the educational materials, including media used (e.g., written brochures, public service announcements, etc.), the topic(s) covered, intended target audience(s), and the distribution method.

Yes

No

B. Proposed Activities:

List the best management practices (BMPs) that you will implement in the area of Illicit Discharge Detection and Elimination. These should be based on a set of priorities that you have identified in the area of Illicit Discharge Detection and Elimination. Provide a short descriptive name to the BMP in the left column and more description in the right column.

PROPOSED BEST MANAGEMENT PRACTICES FOR ILLICIT DISCHARGE DETECTION AND ELIMINATION		
BMP	Name	DESCRIPTION
2A.	Ordinance Adoption	Review/amend/adopt ordinance/or other regulatory mechanism to address requirements of the General Permit.
2B.	Outfall Mapping	Establish GIS storm sewer map and database program to identify stormwater outfall locations of the U.S. waters.
2C.	Storm Water Guide	Develop stormwater management guide to meet the needs of susceptible businesses and residents.
2D.	Illicit Discharge Detection	Develop and implement a plan to detect, identify and eliminate non-stormwater discharges.

If you have additional BMPs to list, please include in a separate attachment.

What specific groups will be targeted, if applicable?

C. Measurable Goals and Implementation Milestones

Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

D. Administrative Information

ADMINISTRATIVE INFORMATION FOR ILLICIT DISCHARGE DETECTION AND ELIMINATION	
PRIMARY CONTACT	POSITION OR TITLE
Steven R. Byrd, P.E.	Public Works Department, City Engineer

Identify other Department(s) that will be involved and their role.

OTHER DEPARTMENT(S)	ROLE
Information Services	City website stormwater page, public service announcements and INFOR stormwater management system.
Community Development Department	Receive citizen concerns; perform field investigations; issue citations.

Identify if you will partner with another MS4 Operator, or with another institution (e.g. Chamber of Commerce, Environmental interest organizations, civic groups) in order to carry out the chosen BMPs.

ENTITY	BMP
N/A	

Will another governmental entity be responsible for implementing one or more chosen BMPs? If so, identify the entity and which BMP(s) it will implement. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.

ENTITY	BMP
N/A	

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SECTION 3
CONSTRUCTION SITE STORMWATER RUNOFF PROGRAM

A. Current Activities

The following is a set of questions on your current Construction Site Stormwater Runoff Program. These questions are intended to highlight minimum program requirements under the MS4 permit. For MS4s who have not been previously covered under an MS4 permit, each element not currently performed must be implemented by the dates identified in Sub-part 4.1.1. of the permit. Thus, each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

CONSTRUCTION SITE RUNOFF ORDINANCES

1. Do the current ordinances/regulations for the municipal stormwater management program comply with Local, State and Federal public notice requirements? If yes, describe how the public is notified.

Yes

Comment: Presently, no formal stormwater management program is in place.

No

2. Do you currently have an erosion prevention and sediment control - or similar - ordinance or regulatory mechanism? If yes, include a copy and reference the page number(s). If No, proceed to the next set of questions below about construction site plans review.

Yes No

Comment: Erosion Control Storm Water Management Ordinance and Standard Construction Requirements and Details (Section 4.0 & 10.0) are enclosed in Appendix "F."

Page _____

3. Does the ordinance or regulatory mechanism require that site operators implement erosion prevention, sediment control, and other construction waste controls for land disturbance activities?

Yes

No

4. Does the ordinance/regulatory mechanism require (explicitly or implicitly) that controls be implemented for any land disturbances greater than or equal to one acre, or less than one acre if part of a large common plan of development or sale that would disturb one acre or more? If yes, note the page number and paragraph number where this is defined.

Yes No

5 Page Number Section 9-406 Paragraph Number

5. Does the ordinance or regulatory mechanism contain or reference technical standards for erosion and sediment control? If yes, note the page number and paragraph number where this is defined.

Yes No

8-11 Page Number Section 9-420 Paragraph Number

6. Do those technical standards meet or exceed the current effective Tennessee Construction General Permit (TNR100000) requirements for design storm and special conditions for impaired waters or exceptional waters?

Yes

No

7. Do those technical standards require that construction activities maintain temporary water quality buffers during construction?

Yes

No

8. Does the ordinance or regulatory mechanism clearly define the criteria - primarily who must submit - for submitting erosion and sediment control information or plans? If yes, note page number and paragraph number

Yes No

6 Page Number Section 9-4-07 Paragraph Number

9. Does the ordinance or regulatory mechanism require approval by the local government prior to commencement of land disturbance activities? If yes, note page number and paragraph number.

Yes No

5 Page Number Section 4-406 Paragraph Number

10. Does the ordinance or regulatory mechanism require re-submittal of erosion and sediment control information or plans if site plans or conditions change during land disturbance activities? If yes, note page number and paragraph number.

Yes No

Page Number Paragraph Number

11. Does the ordinance or regulatory mechanism allow right-of-entry for government officials onto construction sites for inspections? If yes, note page number and paragraph number.

Yes No

Page Number Paragraph Number

12. Does the ordinance or regulatory mechanism give the MS4 owner/operator the authority to STOP WORK in the event of non-compliance violations? If yes, note page number and paragraph number.

Yes No

Page Number Paragraph Number

Comment: This is done in practice, but not required by ordinance.

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CONSTRUCTION SITE PLANS REVIEW

1. Does the municipality presently have in place a technical review process (i.e. engineering department, planning department, zoning board) that evaluates new development and redevelopment construction for construction site runoff?

Yes

No

2. Does the technical review process require an erosion prevention and sediment control plan with appropriate BMPs?

Yes

No

Comment: Site Plan review process requires a plan that addresses erosion prevention and sediment control, but all MS4 stormwater requirements are not included. Proposed ordinance or other regulatory mechanism will include additional requirements.

3. Does the review process include a requirement for pre-construction meeting between the municipality and site developer, for priority construction sites, including at a minimum those construction activities discharging directly into, or immediately upstream of, waters the state recognizes as impaired or exceptional?

Yes

No

4. If there is a review process, provide a brief narrative or a flow chart of the process, describing the process steps, responsible personnel (by department, title and contact person), and criteria used for evaluation of information or plans that are submitted.

Comment: A site plan and departmental check-off list is required to be submitted for all development projects. Each city department must review and approve the plan relating to stormwater, including, but not limited to grading, erosion/sediment control, permanent reclamation, buffers, storm detention and protection of adjacent properties/streams. Criteria used to evaluate site plans include best management practices as described in City Erosion Control and Storm Water Management Ordinance. Deficiencies or omissions in the construction site plans are required to be addressed before approval. The review process will be amended to address MS4 General Permit requirements.

RESPONDING TO PUBLIC INPUT AND COMPLAINTS

1. Does the municipality presently have procedures in place for receipt and consideration of information and complaints submitted by the public?

Yes

No

If Yes, please provide a brief narrative of the receipt process and procedures, describing process steps, responsible departments, and personnel (by title). If available, provide information on complaint tracking, documentation, etc:

Comment: Construction site stormwater runoff complaints are received by phone or e-mail communication through several city departments and are referred to the City Engineer for investigation and action.

ENFORCEMENT AND INSPECTION PROCEDURES

1. Does the municipality presently have personnel and procedures in place for construction site runoff inspection?

Yes

No

2. Does the program provide for pre-construction meeting and monthly inspection of priority sites?

Yes

No

3. Does the municipality presently have procedures and personnel in place for enforcement to the maximum extend for violations of construction site requirements?

Yes

No

Comment: City Erosion Control and Storm Water Management Ordinance Section 9-443, Violations Unlawful, page 14

4. Does the municipality use a STOP WORK order to enforce non-compliance with construction site policies and requirements?

Yes

No

Comment: STOP WORK orders are used in practice, but Ordinance amendments are needed to fully comply with General Permit requirements.

5. How are enforcement actions documented?

Comment: Enforcement actions are documented in inspector's diary and project file for all construction projects.

TRAINING AND EDUCATION

1. Does the municipality presently make construction site runoff control training/information available to the public, developers, engineers, and contractors? (Be aware that the state of Tennessee regularly conducts erosion prevention and sediment control classes across the state. Local governments are encouraged to refer developers and contractors to these classes).

Yes

No

2. Has municipal staff completed state-sponsored training, including the Tennessee Fundamentals of Erosion Prevention and Sediment Control; and the Erosion Prevention and Sediment Control Design Course?

Yes

No

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Comment: Two construction site inspectors have completed the TN EPSC Level 1 Fundamentals course and are EPSC certified.

B. Proposed Activities:

List the best management practices (BMPs) that you will implement in the area of Construction Site Runoff Program. These should be based on a set of priorities that you have identified in the area of Construction Site Runoff Program. Provide a short descriptive name to the BMP in the left column and more description in the right column.

PROPOSED BEST MANAGEMENT PRACTICES FOR CONSTRUCTION SITE RUNOFF PROGRAM		
BMP	Name	DESCRIPTION
3A.	Storm Water Ordinance	Evaluate existing Erosion Control and Stormwater Management Ordinance for amendments to meet requirements of MS4 regulations on BMPs for construction site runoff.
3B.	Site Plan Review	Evaluate the existing site plan review process and implement procedures that address erosion, sediment and construction waste control measures as identified in General Permit.
3C.	Site Inspection and Enforcement	Establish a construction site inspection and enforcement program including site tracking & staff training.
3D.	Public Input and Complaints	Review and modify the current procedures for receiving and documenting public input/ complaints for construction site runoff. Set up a citizen hot line and complaint tracking system via INFOR asset management system as previously discussed in Part V Section 2 - Public Education and Public Participation.

If you have additional BMPs to list, please include in a separate attachment.

What specific groups will be targeted, if applicable?

Developers, contractors, property owners.

C. Measurable Goals and Implementation Milestones

Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

D. Administrative Information

ADMINISTRATIVE INFORMATION FOR CONSTRUCTION SITE RUNOFF PROGRAM	
PRIMARY CONTACT	POSITION OR TITLE
Steven R. Byrd, P.E.	Public Works Department, City Engineer

Identify other Department(s) that will be involved and their role.

OTHER DEPARTMENT(S)	ROLE
Community Development	Site plan review and approval, code enforcement, inspection on private properties and public rights-of-way.
Park and Recreation	Plan approval and oversight of park and trail improvement projects.

Identify if you will partner with another MS4 Operator, or with another institution (e.g. Chamber of Commerce, Environmental interest organizations, civic groups) in order to carry out the chosen BMPs.

ENTITY	BMP
N/A	

Will another governmental entity be responsible for implementing one or more chosen BMPs? If so, identify the entity and which BMP(s) it will implement. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.

ENTITY	BMP
N/A	

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SECTION 4
PERMANENT (POST-CONSTRUCTION) STORMWATER MANAGEMENT IN
NEW DEVELOPMENT AND REDEVELOPMENT PROGRAM

A. Current Activities

The following is a set of questions on your current Permanent Stormwater Management in New Development and Redevelopment Program. These questions are intended to highlight minimum program requirements under the MS4 permit. For MS4s who have not been previously covered under an MS4 permit, each element not currently performed must be implemented by the dates identified in Sub-part 4.1.1. of the permit. Thus, each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

STRUCTURAL AND NON-STRUCTURAL STRATEGIES

1. Does the municipality currently have in place mechanisms or strategies to address permanent stormwater runoff management from new development or redevelopment projects that result in land disturbance of one acre or more? For example, land use planning requirements, zoning directives, site-based local controls such as riparian buffer zone protection; storage or detention of stormwater prior to release to streams; practices to cause stormwater to percolate the soil rather than runoff immediately; vegetative practices.

Yes No

If Yes, please provide a brief narrative of - and/or references to - the structural and non-structural strategies, describing strategies implemented, Best Management Practices allowed, technical guidance, responsible departments, and personnel (by title).

PERMANENT STORMWATER CONTROLS SITE MANAGEMENT ORDINANCE

1. Do you currently have an ordinance or regulatory mechanism that addresses permanent stormwater runoff management from new development and redevelopment projects? If yes, reference the page number in your ordinance. If No, proceed to the next section on permanent stormwater management plans review.

Yes No Page Number _____ Paragraph Number _____

Comment: Existing city Erosion Control and Storm Water Management Ordinance (Section 9-420d, Page 9) and existing Standard Construction Requirements and Details (Section 4.0 & 10.0) addresses post construction, but not to the extent of the MS-4 requirements.

2. Does the ordinance or regulatory mechanism require controls to mitigate pollutants in stormwater runoff? If yes, note page number and paragraph number.

Yes No Page Number _____ Paragraph Number _____

3. Does the ordinance or regulatory mechanism require (explicitly or implicitly) that controls be implemented for any new development or redevelopment projects greater than or equal to one acre, including projects less than one acre that are part of a large common plan of development or sale, that discharge into your small MS4? If yes, note page number and paragraph number.

Yes No Page Number _____ Paragraph Number _____

4. Does the ordinance or regulatory mechanism contain or reference technical standards for water quality controls (e.g., design of detention basins)? If yes, note page number and paragraph number.

Yes No Page Number _____ Paragraph Number _____

5. Does the ordinance or regulatory mechanism clearly define the criteria for submittal -who must submit - of permanent stormwater management design information or plans? If yes, note page number and paragraph number.

Yes No Page Number _____ Paragraph Number _____

6. Does the ordinance or regulatory mechanism require approval prior to construction of permanent stormwater management controls? If yes, note page number and paragraph number.

Yes No Page Number _____ Paragraph Number _____

7. Does the ordinance or regulatory mechanism require re-submittal of permanent stormwater management design information or plans if site plans change after the initial design has been approved? If yes, please note page number and paragraph number.

Yes No Page Number _____ Paragraph Number _____

8. Does the ordinance or regulatory mechanism give the MS4 owner/operator the authority to penalize the owner of permanent stormwater management controls for violations? If yes, note page number and paragraph number.

Yes No Page Number _____ Paragraph Number _____

9. Does the ordinance or regulatory mechanism allow the municipality right-of-entry on property where permanent stormwater

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management controls are installed for inspections? If yes, please note page number and paragraph number.

Yes No _____ Page Number _____ Paragraph Number

10. Does the ordinance or regulatory mechanism require that permanent stormwater management controls have adequate and long-term operation and maintenance? If yes, please note page number and paragraph number. If no, how does the MS4 owner/operator maintain permanent stormwater management controls?

Yes

Section 9-442 (b), page 13, Correction by the City/Collection of Costs in the City Erosion Control and Storm Water Ordinance addresses existing unstable or eroding soil conditions. Additional regulations to meet the MS4 General Permit requirements will be included in the City stormwater program.

No

11. Does the ordinance or regulatory mechanism require establishment and maintenance of water quality buffers in areas of new development and redevelopment?

Yes

No

Comment: Section 9-420 (b), page 9, Performance Criteria in the City Erosion Control and Storm Water Ordinance addresses buffers. Additional regulations to meet the MS4 General Permit requirements will be included in the City stormwater program.

PERMANENT STORMWATER MANAGEMENT PLANS REVIEW

1. Does the municipality presently have in place a technical review process (i.e. engineering department, planning department, zoning board) that evaluates new development and redevelopment with regard to the impact that permanent stormwater runoff will have on receiving streams?

Yes

No

If Yes, provide a brief narrative or a flow chart of the review process, describing the process steps, responsible personnel (by department, title and contact person), and criteria used for evaluation of information or plans that are submitted.

B. Proposed Activities:

List the best management practices (BMPs) that you will implement in the area of the Permanent Stormwater Management Plans Review Program. These should be based on a set of priorities that you have identified in the area of the Permanent Stormwater Management Plans Review Program. Provide a short descriptive name to the BMP in the left column and more description in the right column.

PROPOSED BEST MANAGEMENT PRACTICES FOR PERMANENT STORMWATER MANAGEMENT PLANS REVIEW		
BMP	Name	DESCRIPTION
4A.	Ordinance Adoption	Review/amend existing Erosion Control & Storm Water Management ordinance and/or other regulatory mechanism to address requirements of the General Permit for BMPs on permanent stormwater management.
4B.	Site Plan Approval	Review/amend existing criteria on post construction runoff BMPs; amend criteria to address site plan requirements that better reflects the intent of the General Permit requirements for permanent stormwater management.
4C.	Post-Construction Inspection	Establish an inspection and enforcement program for permanent stormwater BMPs.
4D.		

If you have additional BMPs to list, please include in a separate attachment.

What specific groups will be targeted, if applicable?

Contractors, developers, property owners.

C. Measurable Goals and Implementation Milestones

Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

D. Administrative Information

ADMINISTRATIVE INFORMATION FOR PERMANENT STORMWATER MANAGEMENT PLANS REVIEW

PRIMARY CONTACT	POSITION OR TITLE
Steven R. Byrd, P.E.	Public Works Department, City Engineer

Identify other Department(s) that will be involved and their role.

OTHER DEPARTMENT(S)	ROLE
Community Development	Code Enforcement inspection; review of plans

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Identify if you will partner with another MS4 Operator, or with another institution (e.g. Chamber of Commerce, Environmental interest organizations, civic groups) in order to carry out the chosen BMPs.

ENTITY	BMP
N/A	

Will another governmental entity be responsible for implementing one or more chosen BMPs? If so, identify the entity and which BMP(s) it will implement. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.

ENTITY	BMP
N/A	

**SECTION 5
POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS**

A. Current Activities

The following is a set of questions on your current Pollution Prevention/Good Housekeeping for Municipal Operations Program. These questions are intended to highlight minimum program requirements under the MS4 permit. For MS4s who have not been previously covered under an MS4 permit, each element not currently performed must be implemented by the dates identified in Sub-part 4.1.1. of the permit. Thus, each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

STAFF EDUCATION AND TRAINING

1. Does the municipality's current operation and maintenance program provide annual training for staff on preventing and reducing stormwater pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance?

Yes No

2. Are training activities documented? If yes, please describe training and method of record-keeping.

Yes
No

MUNICIPAL OPERATIONS POLLUTION PREVENTION

1. Does the municipality's operations and maintenance program have policies and procedures in place that address pollution prevention? If yes, please describe procedures. Consider the following in your response: maintenance activities, maintenance schedules; long term inspection procedures for structural and non-structural stormwater controls to reduce floatables and other pollutants; controls for reducing or eliminating the discharge of pollutants from streets, roads, highways; controls for reducing or eliminating pollutants from municipal parking lots, maintenance and storage yards, fleet or maintenance areas with outdoor storage areas, salt/sand storage areas, snow disposal areas, waste transfer stations; disposal of waste removed from storm sewers and the areas listed above; and assessment of impacts on water quality from new flood management projects.

Yes
No

Comment: The City sweeps streets twice a year, once after fall leaf pickup and once after spring trash/brush pickup. Two vehicle wash basins with separators, one at vehicle maintenance center and one at vehicle fueling center.

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MUNICIPAL INDUSTRIAL ACTIVITIES

1. Has the MS4 owner/operator obtained a Tennessee Multi-Sector General Permit or a no-exposure waiver for all qualifying municipal industrial activities? If yes, please give permit numbers or attach copies of the No-Exposure Certification form.

Yes No _____ Permit Numbers(s)

2. List municipally-owned or operated facilities that have a notable potential for contaminating runoff: for example - vehicle maintenance garages; waste transfer operations; golf courses; salt or other materials storage; landfill. If more than one facility for a given type of operation; give the number of such facilities. Indicate if any of these are covered by an NPDES permit. Is there a documented pollution prevention plan in place for these facilities?

FACILITY OR TYPE OF OPERATION	NUMBER OF FACILITIES	IS ACTIVITY COVERED BY NPDES PERMIT?	IS A POLLUTION PREVENTION PLAN IN EFFECT?
Central Services Complex – Vehicle Maintenance	1	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Centennial Golf Course	1	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Big Turtle Wastewater Treatment Plant	1	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
		Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>

B. Proposed Activities:

List the best management practices (BMPs) that you will implement in the area of the Pollution Prevention and Housekeeping Program. These should be based on a set of priorities that you have identified in the area of the Pollution Prevention and Housekeeping Program. Provide a short descriptive name to the BMP in the left column and more description in the right column.

In addition to considering industrial-type operations, you must also consider municipal infrastructure, and related maintenance activities, maintenance schedules and long-term inspection procedures for structural controls and the proper disposal of waste from storm sewers/catch basins, etc. Also included in this program area is discharge of pollutants from roads and parking lots

PROPOSED BEST MANAGEMENT PRACTICES FOR POLLUTION PREVENTION AND HOUSEKEEPING		
BMP	Name	DESCRIPTION
5A.	Training Employees	Education and training for city employees concerning stormwater pollution prevention.
5B.	Policy and Procedure	Develop a policy and procedure manual on pollution prevention, infrastructure maintenance & good housekeeping.
5C.	In-House Inspection	Inspection of city facilities to ensure the proper use of pollution prevention measures.
5D.		

If you have additional BMPs to list, please include in a separate attachment.

What specific groups will be targeted, if applicable?

City Employees

C. Measurable Goals and Implementation Milestones

Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

D. Administrative Information

ADMINISTRATIVE INFORMATION FOR POLLUTION PREVENTION AND HOUSEKEEPING	
PRIMARY CONTACT	POSITION OR TITLE
Steven R. Byrd, P.E.	Public Works Department, City Engineer

Identify other Department(s) that will be involved and their role.

OTHER DEPARTMENT(S)	ROLE
Parks and Recreation	Education, training and inspection
Electric	Education, training and inspection
Schools	Education, training and inspection

Identify if you will partner with another MS4 Operator, or with another institution (e.g. Chamber of Commerce, Environmental interest organizations, civic groups) in order to carry out the chosen BMPs.

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ENTITY	BMP
N/A	

Will another governmental entity be responsible for implementing one or more chosen BMPs? If so, identify the entity and which BMP(s) it will implement. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.

ENTITY	BMP
N/A	

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**ADDENDUM TO SMALL MS4 NPDES PERMIT NOTICE OF INTENT
BEST MANAGEMENT PRACTICES (BMPs) MEASURABLE GOALS AND MILESTONES**

The purpose of this addendum is to record the measurable goals for each BMP, and the dates (month and year) by which interim actions are to be accomplished. Space is given for four BMPs for each of the six minimum measures. If necessary, please attach additional BMP MEASURABLE GOALS AND MILESTONES as a separate attachment.

Measurable goals are BMP design objectives, or goals that will quantify the progress of implementing the actions or performance of a BMP. They are ways to measure activities or effects of a BMP. For each of the six minimum measures and for each BMP, define the measurable goal you will use to monitor effectiveness of this BMP. The BMPs you list here should match exactly those given in Part V., 1-5 of this NOI. For purposes of this NOI, the Public Education and Outreach and Public Involvement/Participation minimum measures have been combined.

For each BMP, establish milestones for implementation. These tables are set up for once/year milestones. You may change the milestone dates to time frames less than one year.

BEST MANAGEMENT PRACTICES FOR PUBLIC EDUCATION AND PUBLIC PARTICIPATION	
BMP 1A	MEASURABLE GOALS AND MILESTONES
Goal(s)	Public communication through updates on existing City website page on stormwater program.
Milestone Year 1	Update the existing web page for current stormwater program information within 180 days of permit coverage.
Milestone Year 2	Maintain/update the website for current information.
Milestone Year 3	Maintain/update the website for current information.
Milestone Year 4	Maintain/update the website for current information.
Milestone Year 5	Maintain/update the website for current information.
BMP 1B	MEASURABLE GOALS AND MILESTONES
Goal(s)	Distribute literature to the public that describes the stormwater program and its benefits.
Milestone Year 1	Develop a minimum of two different brochures that identifies specific aspects of the program that impacts residents and businesses.
Milestone Year 2	Distribute brochures to the public through mailings or other communication means.
Milestone Year 3	Distribute brochures to the public through mailings or other communication means.
Milestone Year 4	Distribute brochures to the public through mailings or other communication means.
Milestone Year 5	Develop new brochures for communication to different stakeholder groups.
BMP 1C	MEASURABLE GOALS AND MILESTONES
Goal(s)	Use public service announcements on the local TV channel to educate and keep the public updated on the program.
Milestone Year 1	Develop presentation on water quality education and program updates.
Milestone Year 2	Present presentation through public service announcements on TV for water quality education and program updates, document feedback.
Milestone Year 3	Amend presentation and provide public service announcements on TV for water quality education and program updates, document feedback.
Milestone Year 4	Amend presentation and provide public service announcements on TV for water quality education and program updates, document feedback.
Milestone Year 5	Amend presentation and provide public service announcements on TV for water quality education and program updates, document feedback.
BMP 1D	MEASURABLE GOALS AND MILESTONES
Goal(s)	Consider a school contest and/or project for school aged children on stormwater related issues.
Milestone Year 1	Work with schools to develop contest guidelines and awards.
Milestone Year 2	Implement the contest and provide website update and newspaper coverage of the contest winner.
Milestone Year 3	Evaluate and consider additional contests.
Milestone Year 4	Evaluate and consider additional contests.
Milestone Year 5	Evaluate and consider additional contests.
BMP 1E	MEASURABLE GOALS AND MILESTONES
Goal(s)	Develop a stormwater requirement for manufacture stenciling of new & replacement junction box lids & catch basin grates.
Milestone Year 1	Develop the program and draft changes to current regulations.

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Milestone Year 2	Adopt changes and implement requirements for stenciling.
Milestone Year 3	Evaluate effectiveness and consider continue the program.
Milestone Year 4	Evaluate effectiveness and consider continue the program.
Milestone Year 5	Evaluate effectiveness and consider continue the program.
BMP 1F	MEASURABLE GOALS AND MILESTONES
Goal(s)	Set up a citizen hotline and complaint tracking system for the receipt of public input and concerns.
Milestone Year 1	Establish a phone number with announcement on city web site and consider additional communication through Facebook, Tweeter and other social media means.
Milestone Year 2	Evaluate tracking system and consider other means of communication with public.
Milestone Year 3	Evaluate tracking system and consider other means of communication with public.
Milestone Year 4	Evaluate tracking system and consider other means of communication with public.
Milestone Year 5	Evaluate tracking system and consider other means of communication with public.
BMP 1G	MEASURABLE GOALS AND MILESTONES
Goal(s)	Develop a Public Information and Education Plan (PIE).
Milestone Year 1	Develop a PIE plan by end of first year; include in year 1 annual report.
Milestone Year 2	Evaluate effectiveness of specific goals and public information events/activities.
Milestone Year 3	Evaluate effectiveness of specific goals and public information events/activities.
Milestone Year 4	Make amendment as needed.
Milestone Year 5	Consider additional events/activities.

BEST MANAGEMENT PRACTICES FOR ILLICIT DISCHARGE DETECTION AND ELIMINATION

BMP 2A	MEASURABLE GOALS AND MILESTONES
Goal(s)	Review/amend/adopt ordinance or other regulatory mechanism to address requirements of the General Permit.
Milestone Year 1	Review and draft amendments to existing ordinance or other regulations mechanism to address requirements of the General Permit.
Milestone Year 2	Implement ordinance or other regulatory mechanism within 18 months of permit coverage. Develop an Enforcement Response Plan (ERP) within 18 months of permit coverage.
Milestone Year 3	Make adopted ordinance/ERP/or other regulatory mechanism known in various public forums; evaluate effectiveness and need for changes; implement changes.
Milestone Year 4	Make adopted ordinance/ERP/or other regulatory mechanism known in various public forums; evaluate effectiveness and need for changes; implement changes.
Milestone Year 5	Make adopted ordinance/ERP/or other regulatory mechanism known in various public forums; evaluate effectiveness and need for changes; implement changes.
BMP 2B	MEASURABLE GOALS AND MILESTONES
Goal(s)	Establish GIS storm sewer map and database program to identify outfall locations of the U. S. water.
Milestone Year 1	Develop program budget/staffing for inventory of stormwater features for incorporation into a GIS; begin mapping.
Milestone Year 2	Complete system inventory, continue GIS mapping and develop information database system.
Milestone Year 3	Maintain GIS storm sewer map and database system.
Milestone Year 4	Maintain GIS storm sewer map and database system.
Milestone Year 5	Maintain GIS storm sewer map and database system.
BMP 2C	MEASURABLE GOALS AND MILESTONES
Goal(s)	Develop stormwater management guide to meet the needs of susceptible businesses and residents.
Milestone Year 1	Identify businesses susceptible to producing illicit discharge.
Milestone Year 2	Develop a stormwater management guide to be distributed to susceptible businesses and residents; distribute guide and other educational material.
Milestone Year 3	Continue distribution guide and other educational material to new businesses and residents.
Milestone Year 4	Continue distribution guide and other educational material to new businesses and residents.
Milestone Year 5	Evaluate effectiveness and consider need for changes to management guide.
BMP 2D	MEASURABLE GOALS AND MILESTONES
Goal(s)	Develop & implement a plan to detect, identify & eliminate non-stormwater discharges.
Milestone Year 1	Establish screening protocols, and equipment/database needs; establish citizen hot line and City web page information for citizens to identify illicit discharges.

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Milestone Year 2	Purchase equipment and implement detection screening program within 18 months of coverage under the permit. Screen 10% of outfalls.
Milestone Year 3	Screen 20% of outfalls; investigate and document reports of illicit discharges.
Milestone Year 4	Screen 30% of outfalls; investigate and document reports of illicit discharges.
Milestone Year 5	Screen remaining outfalls; investigate and document reports of illicit discharges.
BEST MANAGEMENT PRACTICES FOR CONSTRUCTION SITE RUNOFF PROGRAM	
BMP 3A	MEASURABLE GOALS AND MILESTONES
Goal(s)	Evaluate existing Erosion Control and Stormwater Management Ordinance for amendments to meet requirements of MS4 regulations on BMPs for construction site runoff.
Milestone Year 1	Review and draft amendments to the existing Erosion Control and Stormwater Management Ordinance and/or other regulatory mechanism to meet the requirements of MS4 regulations on construction site runoff.
Milestone Year 2	Adopt and implement the amended Erosion Control and Stormwater Management Ordinance and/or other regulatory mechanism within 24 months of coverage under the General Permit.
Milestone Year 3	Make Ordinance and/or other regulatory mechanism known through various forms.
Milestone Year 4	Review effectiveness and evaluate Ordinance and/or other regulatory mechanism for needed changes.
Milestone Year 5	Review effectiveness and evaluate Ordinance and/or other regulatory mechanism for needed changes.
BMP 3B	MEASURABLE GOALS AND MILESTONES
Goal(s)	Evaluate the existing site plan review process and implement procedures that addresses erosion, sediment and construction waste control measures as identified in General Permit.
Milestone Year 1	Evaluate existing site plan review process and developer's check list to better address site plan elements to meet requirements of construction site runoff.
Milestone Year 2	Implement necessary changes to site plan review process and to the developer's check list.
Milestone Year 3	Review effectiveness of the site plan review process and check list and modify as needed.
Milestone Year 4	Review effectiveness of the site plan review process and check list and modify as needed.
Milestone Year 5	Review effectiveness of the site plan review process and check list and modify as needed.
BMP 3C	MEASURABLE GOALS AND MILESTONES
Goal(s)	Establish a construction site inspection and enforcement program.
Milestone Year 1	Develop and implement site inspection check list and pre-construction meeting check list.
Milestone Year 2	Develop educational requirements for staff training as required in General Permit; begin training; incorporate into ERP as mentioned in BMP 2A milestones.
Milestone Year 3	Continue training.
Milestone Year 4	Evaluate inspection and enforcement program for needed changes and maintain require training certifications.
Milestone Year 5	Evaluate inspection and enforcement program for needed changes and maintain require training certifications.
BMP 3D	MEASURABLE GOALS AND MILESTONES
Goal(s)	Review and modify the current procedures for receiving and documenting public input/ complaints for construction site runoff. Set up a citizen hotline and complaint tracking system via INFOR asset management system as previously discussed in Part V Section 2 - Public Education and Public Participation.
Milestone Year 1	Inventory all active public and private construction sites.
Milestone Year 2	Input citizen complaints and construction site inventory into INFOR stormwater asset management system within 24 months of coverage under the General Permit.
Milestone Year 3	Review the effectiveness of the complaint tracking system for needed changes. Maintain construction site inventory.
Milestone Year 4	Review the effectiveness of the complaint tracking system for needed changes. Maintain construction site inventory.
Milestone Year 5	Review the effectiveness of the complaint tracking system for needed changes. Maintain construction site inventory.
BEST MANAGEMENT PRACTICES FOR PERMANENT (POST-CONSTRUCTION) STORMWATER MANAGEMENT PROGRAM	
BMP 4A	MEASURABLE GOALS AND MILESTONES
Goal(s)	Review/amend existing ordinance and/or other regulatory mechanism to address requirements of the General permit for BMPs on permanent stormwater management.
Milestone Year 1	Review existing ordinances and/or other regulatory mechanism using EPA Water Quality Scorecard; submit scorecard within first year annual report. For new and redevelopment projects, develop inventory and tracking system within 180 days from coverage of General Permit.

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Milestone Year 2	Draft necessary changes to existing ordinance and/or other regulatory mechanism to address the MS4 General Permit requirements not already covered under existing documents.
Milestone Year 3	Present draft ordinance and/or other regulatory mechanism to City Council for approval.
Milestone Year 4	Implement ordinance and/or other regulatory mechanism within 4 years of coverage under the General Permit.
Milestone Year 5	Review effectiveness of changes.
BMP 4B	MEASURABLE GOALS AND MILESTONES
Goal(s)	Review/amend existing criteria on post construction runoff BMPs; amend criteria to address site plan requirements that reflect the intent of the General Permit requirements for permanent stormwater management.
Milestone Year 1	Review existing criteria on post construction runoff BMPs; seek input from stakeholders on procedures.
Milestone Year 2	Amend existing criteria/adopt new criteria procedures on post construction runoff BMPs.
Milestone Year 3	Evaluate implemented procedures for necessary changes.
Milestone Year 4	Evaluate implemented procedures for necessary changes.
Milestone Year 5	Evaluate implemented procedures for necessary changes.
BMP 4C	MEASURABLE GOALS AND MILESTONES
Goal(s)	Establish an inspection and enforcement program for permanent stormwater BMPs.
Milestone Year 1	Evaluate existing inspection and enforcement program to assure measures are undertaken under existing legal authority to require permanent stormwater BMPs.
Milestone Year 2	Proposed necessary changes to meet the intent of the General permit requirements; seek input from stakeholders; incorporate into ERP.
Milestone Year 3	Implement the inspection and enforcement program.
Milestone Year 4	Evaluate effectiveness of the inspection and enforcement program for needed changes.
Milestone Year 5	Evaluate effectiveness of the inspection and enforcement program for needed changes.
BMP 4D	MEASURABLE GOALS AND MILESTONES
Goal(s)	
Milestone Year 1	
Milestone Year 2	
Milestone Year 3	
Milestone Year 4	
Milestone Year 5	
BEST MANAGEMENT PRACTICES FOR MUNICIPAL POLLUTION PREVENTION AND GOOD HOUSEKEEPING	
BMP 5A	MEASURABLE GOALS AND MILESTONES
Goal(s)	Education and training for city employees concerning stormwater pollution prevention.
Milestone Year 1	Draft an education and training plan for city employees.
Milestone Year 2	Present the draft plan in a public forum and receive comments.
Milestone Year 3	Finalize plan and implement education and training.
Milestone Year 4	Review effectiveness and revise program as necessary.
Milestone Year 5	Review effectiveness and revise program as necessary.
BMP 5B	MEASURABLE GOALS AND MILESTONES
Goal(s)	Develop a policy and procedure manual on pollution prevention and good housekeeping.
Milestone Year 1	Develop a written document describing proper pollution prevention and good housekeeping.
Milestone Year 2	Develop draft manual that addresses procedure for pollution prevention and good housekeeping for city employees.
Milestone Year 3	Review procedure with city employees for comments and implement procedure.
Milestone Year 4	Review effectiveness and revise procedure as necessary.
Milestone Year 5	Review effectiveness and revise procedure as necessary.
BMP 5C	MEASURABLE GOALS AND MILESTONES
Goal(s)	Inspection of city facilities to ensure the proper use of pollution prevention measures.
Milestone Year 1	Draft an inspection plan for appropriate city employees.
Milestone Year 2	Present the draft inspection plan to city employees for comment; implement plan.
Milestone Year 3	Evaluate inspection plan for necessary changes.

Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)

Milestone Year 4	Evaluate inspection plan for necessary changes.
Milestone Year 5	Evaluate inspection plan for necessary changes.
BMP 5D	MEASURABLE GOALS AND MILESTONES
Goal(s)	
Milestone Year 1	
Milestone Year 2	
Milestone Year 3	
Milestone Year 4	
Milestone Year 5	