Tennessee Department of Environment and Conservation
Division of Water Pollution Control
L & C Tower Annex, 6th Floor
401 Church Street
Nashville, Tennessee 37243

RECEIVED
DEC 28 2010
JOHNSON CITY ENVIRONMENTAL ASSISTANCE CENTER

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: City of Bristol Tennessee

Margaret Feierabend — Responsible Elected Official or Officer
Mayor — Title

801 Anderson Street — Street Address
Bristol — City
TN — State
37620 — Zip Code

PROGRAM CONTACT	TECHNICAL CONTACT
William L. Sorah	Timothy H. Beavers, PE
Name	Name
bsorah@bristoltn.org	tbeavers@bristoltn.org
Email Address	Email Address
(423) 989-5565	(423) 989-5566
Phone Number	Phone Number

☒ Attach an organizational chart that shows the different departments involved in stormwater management.

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 32.69

If city, town, university, or utility district: Give additional area of urban growth boundary 31.63

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

If county, indicate by checking the appropriate box if the permit will be used to regulate non-UA portions of your county:

Entire county (unincorporated) ☐ Non-UA portions, as follows (describe below) ☐

_____

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	66 (miles)	Open Ditches	71.8 (miles)
Culverts	3433 total, 250 road culverts (estimate)	Catch Basins	1870
Retention Basins	0	Detention Basins	0

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:

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

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/wpc/publications/#wqassessment), 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
Beaver Creek 042-1000	Nitrates E-coli	Discharges from Watershed Pasture Grazing
Beaver Creek 042-2000	Habitat loss due to alteration in stream-side or littoral vegetative cover Nitrates Loss of Biological integrity due to siltation E-coli	Channelization Pasture Grazing Discharges from Watershed Sources Outside State Borders
Cedar Creek 042-0500	Nitrates Loss of biological integrity due to siltation Other Anthropogenic Habitat Alterations E-coli	Discharges from Watershed Land Development
Little Creek 042-0400	E-coli Phosphorus Loss of biological integrity due to siltation Physical Substrate Habitat Alteration Alteration in stream-side or littoral vegetative cover	Discharges from Watershed Sources Outside State Borders
Paperville (Sinking) Creek 041-0100	Loss of biological integrity due to siltation	Land Development
Back Creek (042-0200)	Loss of biological integrity due to siltation E-coli Physical substrate habitat alterations Nitrates	Discharges from Watershed Unrestricted Cattle Access Pasture Grazing Channelization

ITEM E
HAS THE STATE OR EPA ISSUED A TDML 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/wpc/tmdl/approved.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
Beaver Creek 042-2000	Siltation/Habitat Alteration, E-coli
Cedar Creek 042-0500	Siltation/Habitat Alteration, E-coli
Back Creek 042-0200	Siltation/Habitat Alteration, E-coli

Beaver Creek 042-1000	E-coli
Little Creek 042-0400	E-coli

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

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.

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 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."

Signature	Title/Municipality	Date
Margaret Feinchel	Mayor, City of Bristol Tennessee	12-23-10

(Go to next page.)

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 ☐

The City participates in the TNSA public service announcements on water quality and pollution prevention via radio. The City uses PSAs from WaterWorks! on its public TV channel. The City distributes an EPA publication entitled "Thirstin's Wacky Water Adventure" to third graders within the public school system.

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 ☐

The City provides public notices as required by law for development activities. The City participates in the Beaver Creek Watershed Alliance, Tennessee Stormwater Association and Boone Watershed Partnership. As part of these partnerships the City participates in annual stream and lake litter collection by providing refuse containers and disposal of the litter and debris collected during the cleanups. The City also participates in the South Holston Lake watershed cleanup. The City provides opportunities for public reports of illegal dumping and illicit discharges via a telephone number listed on its website. The City posts advertisements for the TDEC sponsored household hazardous waste collection day.

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 ☐

Notices of public hearings for comments on ordinances to be considered by City Council are published in the local newspaper prior to consideration by the governing body. In addition, public notification is placed on the City's website.

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.	Continue Public Outreach and	Continue current public outreach and education program as required/defined by the first Small MS4 Permit and described in the City's latest Annual Report. Changes to the program will be

	Education Program	made throughout the permit period as required by the current Small MS4 Permit and as indicated by the BMPs in this NOI.
1B.	PIE Plan	Create PIE Plan, which focuses on priority areas, groups, and pollutants and includes specific goals and public information events and activities. In accordance with the plan, implement public information events and activities. In accordance with permit requirements, PIE implementation will include outreach targeted at specific stream impairments within Bristol watersheds and IDDE outreach (inform public employees, businesses and general public of hazards associated with illegal discharges and improper disposal of waste).
1C.	Website	Implement a website to inform citizens of public outreach and involvement opportunities and provide basic information on stormwater pollution and pollution prevention.

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

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

School children will be targeted as part of the school outreach. Developers, engineers and contractors to be targeted as part of impaired stream outreach for awareness of siltation impairments in specific watersheds. Other target groups are to be determined as part of PIE Plan development.

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
William L. Sorah	Deputy City Manager – Public Works

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

OTHER DEPARTMENT(S)	ROLE
None	

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
None	

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
None	

SECTION 2
ILLICIT DISCHARGE DETECTION AND ELIMINATION

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

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

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

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.

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 ☐

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 ☐ CD74:46 – CD74:50 Page Number Chap 74, Article VI Ordinance Section Number

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 ☐ CD74:48 Page Number 74-373 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 ☐ $5,000 Maximum Penalty CD74:49 Page Number 74-388 & 74-390 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 ☐

The City has personnel that perform dry weather screening at all City outfalls. This activity is performed by the Public Works Department's staff. The screening is performed in accordance with the City's SOPs. Documentation is kept in the Public Works Department's central filing system. One-hundred percent (100%) of the City's outfalls have been screened.

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 ☒

The City has personnel that can issue NOVs of the illicit discharge ordinance and follow-up on enforcement

No ☐ actions in accordance with the authority of the City as stated in the ordinance. There is currently no formally documented procedure for enforcement.

3. How are enforcement actions documented?

Enforcement actions are documented through the NOV process. Written correspondence is used for issuance of an NOV. These are filed in the City's NPDES files. When an NOV is issued, the violation and required corrective actions are documented on the NOV. The NOV is closed upon implementation of the corrective action(s). Inspection logs document that corrective actions have been completed (or not) and such logs are kept in the City's NPDES files, according to Permit Year.

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 ☐

Hotspots are defined in the City's post-construction ordinance (Chap 74, Art VII). The City has the authority to screen and inspect hotspot areas. Historically, the City has screened all outfalls and used the screening as an indicator of issues in the watershed.

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 ☒
No ☐

Non-stormwater discharge complaints/information are routed to staff within the Public Works Department, who take responsibility for complaint response, investigation and elimination (if needed). This is performed in accordance with the City's IDDE procedure. Codes Enforcement officials are responsible for progressive enforcement if required. Documentation is kept by the Public Works Department's staff in the City's NPDES files.

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 ☐

The City uses public service announcements (PSAs) created by Waterworks for this education. The PSAs are distributed via television and radio and focus on education of the general public. Topics include: keeping grass clippings out of waterways, limiting soil erosion, the importance of vehicle maintenance and used oil recycling.

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.	Continue current IDDE program	The City will continue to implement the IDDE program, as required/defined by the first Small MS4 General NPDES Permit and as described in the City's latest Annual Reports. Changes to the program will be made throughout the permit period as required by the current Small MS4 General NPDES Permit and as indicated by the BMPs in this NOI.
2B.	Storm sewer system map maintenance	The storm sewer system map will be updated on an annual basis to reflect the addition or elimination of any system outfalls or inputs.
2C.	Outfall dry weather screening	The City will continue screening all stormwater outfalls located within the small MS4 in accordance with the City's procedures for illicit discharge detection and elimination. The screening will be used as an indicator of issues in the watershed and documented in accordance with standard City procedure. Non-stormwater discharges identified during dry weather screening/inspections will be investigated in accordance with the City's investigation procedures and illicit discharge ordinance.
2D.	Enforcement Response Plan	An Enforcement Response Plan (ERP) for the City's illicit discharge detection and elimination program will be developed and implemented.

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

What specific groups will be targeted, if applicable?

The general public, residents, and businesses

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
Timothy Beavers, PE	City Engineer

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

OTHER DEPARTMENT(S)	ROLE
Fire Department	The Fire Department responds for discharges/dumping of hazardous materials, and to assist with elimination/clean up of spills as necessary (e.g., petroleum spills).
Community Development	Community Development is involved in enforcement activities for activities that do not immediately comply with NOVs.

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
None	

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
None	

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 ☒ No ☐

All ordinances and regulations must be formally adopted by the Bristol, TN City Council during a meeting of the City Council, which is open to the general public. The ordinance/regulation is included on the agenda for the City Council meeting, and the agenda is available to the public. The meeting is advertised on the City website. The public has the opportunity to comment on the ordinance/regulation during the City Council meeting.

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 ☐ CD74:37 – CD74:46 Page Number Chap 74, Article V Paragraph Number

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 ☐ CD74:40 Page Number 7-284 (b) and (c) 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 ☐ CD74:40 – CD74:43 Page Number 74-296 thru 74-300 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 ☐ CD74:40 Page Number 74-284 (b) and 74-285 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 ☐ C74:40 Page Number 74-284 (b) 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 ☐ CD74:44 Page Number 74-327 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 ☐ CD74:45 Page Number 74-329 (a) and (b) 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 ☐ CD74:45 Page Number 74-329 (c) and 74-330 (b) Paragraph Number

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 ☐

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.

All site plans are submitted to the Department of Community Development, which distributes copies to all relevant City departments. The Public Works Department reviews stormwater aspects of the plans (erosion and sediment control, post-construction water quality) for conformance with City and TN-CGP requirements. The Public Works Department then comments on the site plan and gives an indication of compliance or noncompliance back to the Department of Community Development. The Department of Community Development handles discussions/issue resolution with the developer and design professional.

The Public Works Department reviews revisions to the site plan as often as needed until the plan is acceptable. The Department of Community Development will approve the site plan once all relevant department comments are resolved.

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:

Information and complaints regarding construction site runoff are handled by the staff in the Engineering Division of the Public Works Department. Public Works staff responds to the complaint as appropriate. On-site investigation is the typical response to determine complaint validity and any required corrective actions. Investigations are documented and placed in the City's NPDES files.

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 ☐

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

Yes ☒ No ☐

5. How are enforcement actions documented?

Enforcement actions are documented through the NOV process. Written correspondence is used for issuance of an NOV. These are placed in the City's NPDES files. When an NOV is issued, the violation and required corrective actions are documented on the NOV. The NOV is closed upon implementation of the corrective action(s). Inspection logs document that corrective actions have been completed (or not) and such logs are kept in the City's NPDES files, according to Permit Year.

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 ☐

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.	Continue the current construction site runoff management program	The City will continue to implement the Construction Site Runoff management program, as required/defined by the first Small MS4 General NPDES Permit and as described in the City's latest Annual Reports. Changes to the program will be made throughout the permit period as required by the current Small MS4 General NPDES Permit and as indicated by the BMPs in this NOI.
3B.	Construction site runoff ordinance	The City's existing erosion and sediment control ordinance will be reviewed in light of the requirements of the small MS4 General NPDES Permit and the Tennessee Construction General

	update	Permit. Revisions will be made to correct any deficiencies identified during the review.
3C.	Construction site inventory	The City will develop and maintain an inventory of all active public and private construction sites that result in a total land disturbance as defined in section 4.2.4 of the small MS4 General NPDES Permit. The inventory will contain relevant information for each construction site as defined in section 4.2.4.d of the small MS4 General NPDES Permit.
3D.	Enforcement Response Plan	An Enforcement Response Plan (ERP) for the City's construction site stormwater runoff control program will be developed and implemented.

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

What specific groups will be targeted, if applicable?

Construction site owners and operators, City construction site inspectors, and City construction site plan reviewers

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
Timothy Beavers, PE	City Engineer

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

OTHER DEPARTMENT(S)	ROLE
Codes Enforcement Division	The Codes Enforcement Division handles implementation of the small lot requirements contained in the City's erosion control ordinance. This division also must get involved in enforcement actions that have progressed to the court system.
Department of Community Development	The Department of Community Development facilitates and oversees the City plan review process. This department is responsible for getting site plans to the City Engineer and seeing that comments are resolved before issuing an approval for a site plan.

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
None	

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
None	

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).

The City of Bristol addresses permanent stormwater runoff management from new development or redevelopment projects that result in land disturbance of one acre or more through an ordinance that requires the implementation of water quality BMPs on each site. Each site is required to capture and treat a defined volume of water (called the water quality volume or WQv) to an 80% TSS removal standard. A Water Quality BMP Manual has been developed and implemented to support the requirements of the ordinance by defining the WQv and 80% TSS removal standard, providing detailed design requirements and calculation guidance, and providing detailed inspection and maintenance guidance/checklists for the BMP owner. The 80% removal standard is a presumptive standard, in that compliance with the standard is presumed to be achieved if the BMP is designed, constructed and maintained in accordance with the requirements and guidance of the ordinance and manual. The City provides compliance oversight of the 80% TSS removal standard at various key stages of the life of the BMP. Design compliance reviews are performed through City review and approval of stormwater BMP design plans, construction compliance reviews are performed through City inspection of stormwater (post-construction) BMPs on construction sites and through City approval of record drawings (i.e., as-built drawings) that are developed after construction is complete. Finally, maintenance compliance reviews are performed through regular inspection of each water quality BMP by City staff. The City's ordinance includes the authority to require BMP maintenance.

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 ☐ CD74:50 – CD74:56 Page Number Chap 74, Article VII Paragraph Number

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 ☐ CD74:52 Page Number 74-411 (a) 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 ☐ CD74:52 Page Number 74-411 (a) and 74-412 (a) 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 ☐ CD74:53 Page Number 74-413 (a) 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 ☐ CD74:52 Page Number 74-411(a) and 74-412 (a) 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 ☐ CD74:52 Page Number 74-411 (a) 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 ☐ CD74:53 Page Number 74-414 (e) 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 ☐ CD74:55 – CD74:56 Page Number 74-434 and 74-435 Paragraph Number

9. Does the ordinance or regulatory mechanism allow the municipality right-of-entry on property where permanent stormwater management controls are installed for inspections? If yes, please note page number and paragraph number.

Yes ☒ No ☐ CD74:55 Page Number 74-432 (a) 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 ☒
No ☐

74-431 entire section, CD74:55

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

Yes ☒ No ☐

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.

All site plans are submitted to the Department of Community Development, which distributes copies to all relevant City departments. The Public Works Department reviews stormwater aspects of the plans (erosion and sediment control, post-construction water quality) for conformance with City and TN-CGP requirements. The Public Works Department then comments on the site plan and an indication of compliance or noncompliance by the Public Works Department are given back to the Department of Community Development. The Department of Community Development handles discussions/issue resolution with the developer and design professional. The Public Works Department reviews revisions to the site plan as often as needed until the plan is acceptable. The Department of Community Development will approve the plan once all relevant department comments are resolved.

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.	Continue permanent stormwater management program	The City will continue to implement the permanent (post-construction) stormwater management program, as required/defined by the first Small MS4 General NPDES Permit and as described in the City's latest Annual Reports. Changes to the program will be made throughout the permit period as required by the current Small MS4 General NPDES Permit and as indicated by the BMPs in this NOI.
4B.	Update the water quality buffer requirement	The City will review the current City water quality buffer requirement in light of the requirements of the small MS4 General NPDES Permit. The City's requirement will be modified where necessary to align it with the conditions of the permit.
4C.	Update the permanent	The City will update the current City performance standards, as defined in the post-construction ordinance and Water Quality BMP Manual, to include site design standards to meet the Runoff

	stormwater management performance standards and program tools	Reduction requirement of the Small MS4 General NPDES Permit. Standards for off-site mitigation and/or payment into a public stormwater project fund may or may not be included, as will be determined by the City during the course of the five year permit period. Other supporting elements of the City's program, such as project plan review and approval process, construction site/post-construction BMP inspections, owner/operator inspections and BMP maintenance tools will be modified as necessary to support the additional performance standards and requirements.
4D.	Enforcement Response Plan	An Enforcement Response Plan (ERP) for the City's permanent stormwater management program will be developed and implemented.

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

What specific groups will be targeted, if applicable?

Developers, Design Professionals and Water Quality BMP 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
Timothy Beavers, PE	City Engineer

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

OTHER DEPARTMENT(S)	ROLE
Department of Community Development	The Department of Community Development facilitates and oversees the City plan review process. The department is responsible for providing site plans to the City Engineer and ensuring design issues are resolved before issuing an approval for the site plan.

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
None	

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
None	

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 ☐

Annual training is provided for pertinent staff and covers illicit discharge detection and elimination, pollution prevention and good housekeeping, and erosion and sediment control. The training is documented through a sign-in sheet.

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 ☐

The City performs litter pick up on major roadways and in commercial areas. All streets are swept as needed, with the streets in commercial areas swept five times per week. Additional sweeping is conducted upon request and following special events. The City has a City Vehicle Cleaning and Washing Policy requiring that vehicles be washed at the indoor wash facility or the covered outdoor wash facility. Both the municipal garage and wastewater treatment facility are inspected once per quarter to identify any deficiencies in good housekeeping procedures. The wastewater treatment facility is inspected daily as part of routine procedures. Spill prevention and response BMPs have been implemented at the municipal garage.

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 ☐ Municipal Garage - *TNR056416* Bristol WWTP- *TNR0546415* _____ 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?
Demolition landfill	1	Yes ☐ No ☒	Yes ☒ No ☐
Municipal Waste Water Treatment Plant	1	Yes ☒ No ☐	Yes ☒ No ☐
Municipal Garage at City Operations Facility	1	Yes ☐ No ☒	Yes ☒ No ☐
Municipally Owned 9-Hole Golf Course (18 Little Lane)	1	Yes ☐ No ☒	Yes ☐ No ☒
Auxiliary Salt Shed (1120 Vance Drive)	1	Yes ☐ No ☒	Yes ☐ No ☒

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.	Continue Pollution Prevention and good housekeeping	The City will continue to implement its pollution prevention and good housekeeping program as required/defined by the first Small MS4 NPDES Permit and as described in the City's latest Annual Reports. The City will conduct a review of its facilities and activities to assess the effectiveness of current good housekeeping program and proximity to impaired waters. For gaps discovered during

	Program	the review the City will implement necessary procedures and structures to prevent stormwater pollution. Changes to the program will be made throughout the permit period as required by the current Small MS4 Permit and as indicated by the BMPs in this NOI.
5B.	New Facilities	The City will ensure that new facilities and projects for which the City is the owner comply with City construction and permanent stormwater control ordinances.
5C.	Flood Control Projects	The City does not have any planned flood control structures or facilities and thus cannot assess water quality impacts of flood control projects. One Army Corps of Engineers flood control project for Bristol, TN and Bristol, VA is planned and water quality impacts are assumed to be analyzed by the Corps for this project.

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

What specific groups will be targeted, if applicable?

City Staff

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
William L Sorah	Deputy City Manager - Public Works

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

OTHER DEPARTMENT(S)	ROLE
Parks and Recreation	Department staff will be responsible for implementing SWPPPs and good housekeeping in their respective facilities and activities. Staff will participate in good housekeeping training.

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
None	

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
None	

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)	Continue Public Outreach and Education Program.
Milestone Year 1	Continue program as described in BMP1A.
Milestone Year 2	Implement program under BMP1B.
Milestone Year 3	Implement program under BMP1B.
Milestone Year 4	Implement program under BMP1B.
Milestone Year 5	Implement program under BMP1B.
BMP 1B	MEASURABLE GOALS AND MILESTONES
Goal(s)	PIE Plan Creation and Implementation.
Milestone Year 1	Develop PIE Plan.
Milestone Year 2	Implement PIE Plan.
Milestone Year 3	Continue.
Milestone Year 4	Continue.
Milestone Year 5	Continue.
BMP 1C	MEASURABLE GOALS AND MILESTONES
Goal(s)	Website.
Milestone Year 1	Within 30 days of coverage, implement website to inform citizens of public outreach and involvement opportunities and provide basic information on stormwater pollution and pollution prevention.
Milestone Year 2	Update website.
Milestone Year 3	Update website.
Milestone Year 4	Update website.
Milestone Year 5	Update website.

BEST MANAGEMENT PRACTICES FOR ILLICIT DISCHARGE DETECTION AND ELIMINATION	
BMP 2A	MEASURABLE GOALS AND MILESTONES
Goal(s)	Detect and take steps to eliminate illicit discharges located within the MS4 by continuing the City's IDDE program.
Milestone Year 1	Continue.
Milestone Year 2	Continue.
Milestone Year 3	Continue.
Milestone Year 4	Continue.
Milestone Year 5	Continue.

BMP 2B	MEASURABLE GOALS AND MILESTONES
Goal(s)	Maintain the City storm sewer system map on an annual basis.
Milestone Year 1	Update storm sewer system map.
Milestone Year 2	Update storm sewer system map.
Milestone Year 3	Update storm sewer system map.
Milestone Year 4	Update storm sewer system map.
Milestone Year 5	Update storm sewer system map.

BMP 2C	MEASURABLE GOALS AND MILESTONES
Goal(s)	Perform dry weather screening for all outfalls such that all City outfalls are screened at least once during the five year permit period. Investigate and take steps to eliminate non-stormwater discharges found during screening.
Milestone Year 1	Screen a portion of City outfalls.
Milestone Year 2	Screen a portion of City outfalls.
Milestone Year 3	Screen a portion of City outfalls.
Milestone Year 4	Screen a portion of City outfalls.
Milestone Year 5	Screen a portion of City outfalls.

BMP 2D	MEASURABLE GOALS AND MILESTONES
Goal(s)	1. Develop an Enforcement Response Plan for the City's IDDE program. 2. Implement the IDDE ERP.
Milestone Year 1	No action.
Milestone Year 2	Develop ERP within 18 months of coverage under the small MS4 General NPDES Permit.
Milestone Year 3	Implement ERP.
Milestone Year 4	Implement ERP.
Milestone Year 5	Implement ERP.

BEST MANAGEMENT PRACTICES FOR CONSTRUCTION SITE RUNOFF PROGRAM	
BMP 3A	MEASURABLE GOALS AND MILESTONES
Goal(s)	Continue to implement the City's construction site management program under the authority of the City's erosion prevention and sediment control ordinance.
Milestone Year 1	Continue.
Milestone Year 2	Continue.
Milestone Year 3	Continue.
Milestone Year 4	Continue.
Milestone Year 5	Continue.

BMP 3B	MEASURABLE GOALS AND MILESTONES
Goal(s)	Revise the City's existing erosion control ordinance to align it with the requirements of the small MS4 General NPDES Permit and the Tennessee Construction General Permit. *Timing of the goal assumes timely input from TDEC on its vision of a model Erosion and Sediment Control Ordinance.
Milestone Year 1	Continue EPSC program using current City ordinance.
Milestone Year 2	Review and modify the ordinance. Adopt the revised ordinance.
Milestone Year 3	Continue EPSC program using revised City ordinance.
Milestone Year 4	Continue EPSC program using revised City ordinance.
Milestone Year 5	Continue EPSC program using revised City ordinance.

BMP 3C	MEASURABLE GOALS AND MILESTONES
Goal(s)	Develop and implement the construction site inventory.

Milestone Year 1	Develop the construction site inventory. Implement the construction site inventory within 12 months of coverage under the small MS4 General NPDES Permit.
Milestone Year 2	Update the inventory as new construction sites are permitted and are completed.
Milestone Year 3	Update the inventory as new construction sites are permitted and are completed.
Milestone Year 4	Update the inventory as new construction sites are permitted and are completed.
Milestone Year 5	Update the inventory as new construction sites are permitted and are completed.

BMP 3D	MEASURABLE GOALS AND MILESTONES
Goal(s)	1. Develop an Enforcement Response Plan for the City's construction site stormwater runoff program. 2. Implement the construction site stormwater runoff ERP.
Milestone Year 1	No action.
Milestone Year 2	Develop ERP within 18 months of coverage under the small MS4 General NPDES Permit.
Milestone Year 3	Implement ERP.
Milestone Year 4	Implement ERP.
Milestone Year 5	Implement ERP.

BEST MANAGEMENT PRACTICES FOR PERMANENT (POST-CONSTRUCTION) STORMWATER MANAGEMENT PROGRAM	
BMP 4A	MEASURABLE GOALS AND MILESTONES
Goal(s)	Continue to implement the City's permanent stormwater management program under the authority of the City's post-construction ordinance and with the guidance of the Water Quality BMP Manual.
Milestone Year 1	Continue.
Milestone Year 2	Continue.
Milestone Year 3	Continue.
Milestone Year 4	Continue.
Milestone Year 5	Continue.

BMP 4B	MEASURABLE GOALS AND MILESTONES
Goal(s)	Revise the current water quality buffer requirements to comply with section 4.2.5.1 of the Small MS4 General NPDES Permit.
Milestone Year 1	No action.
Milestone Year 2	No action.
Milestone Year 3	No action.
Milestone Year 4	No action.
Milestone Year 5	Revise post-construction ordinance and implement new requirements.

BMP 4C	MEASURABLE GOALS AND MILESTONES
Goal(s)	1. Update the City's current permanent stormwater management program to include requirements for Runoff Reduction. 2. Review and update other elements of the City's program as necessary to support new requirements for runoff reduction. Other elements include plans review and approval, construction site inspections, record drawing requirements, BMP owner inspections, MS4 post-construction inspections, and maintenance requirements.
Milestone Year 1	No action.
Milestone Year 2	No action.
Milestone Year 3	No action.
Milestone Year 4	No action.
Milestone Year 5	Update City program to fully include and support Runoff Reduction requirements.

BMP 4D	MEASURABLE GOALS AND MILESTONES
Goal(s)	1. Develop an Enforcement Response Plan for the City's permanent stormwater management program.

	2. Implement the permanent stormwater management ERP.
Milestone Year 1	No action.
Milestone Year 2	Develop ERP within 18 months of coverage under the small MS4 General NPDES Permit.
Milestone Year 3	Implement ERP.
Milestone Year 4	Implement ERP.
Milestone Year 5	Review and revise ERP as deemed necessary to support program updates as indicated in BMPs 4A through 4F. Continue to implement ERP.

BEST MANAGEMENT PRACTICES FOR MUNICIPAL POLLUTION PREVENTION AND GOOD HOUSEKEEPING	
BMP 5A	MEASURABLE GOALS AND MILESTONES
Goal(s)	Continue pollution prevention and good housekeeping Program.
Milestone Year 1	Review City facilities and activities to assess the effectiveness of the current good housekeeping program. The program will be revised if necessary to address any issues identified in the assessment.
Milestone Year 2	Continue program.
Milestone Year 3	Continue program.
Milestone Year 4	Continue program.
Milestone Year 5	Continue program.
BMP 5B	MEASURABLE GOALS AND MILESTONES
Goal(s)	New Facilities
Milestone Year 1	Ensure that new facilities and projects for which the City is the owner comply with construction and permanent stormwater control ordinances.
Milestone Year 2	Continue program.
Milestone Year 3	Continue program.
Milestone Year 4	Continue program.
Milestone Year 5	Continue program.
BMP 5C	MEASURABLE GOALS AND MILESTONES
Goal(s)	Flood Control Projects
Milestone Year 1	For any new proposed flood control project, calculate water quality impacts as compared to the requirements of its permanent stormwater control ordinance.
Milestone Year 2	Continue, as applicable.
Milestone Year 3	Continue, as applicable.
Milestone Year 4	Continue, as applicable.
Milestone Year 5	Continue, as applicable.

SECTION 2: ILLICIT DISCHARGE DETECTION AND ELIMINATION

Additional BMPs

BMP	Name	DESCRIPTION
2E	IDDE procedures assessment and update	All existing City procedures pertaining to illicit discharge detection and elimination will be assessed in light of the requirements of the small MS4 General NPDES Permit. Such procedures will be updated, if warranted, to eliminate any deficiencies identified during the assessment.

BMP 2E	MEASURABLE GOALS AND MILESTONES
Goal(s)	1. Assess existing City procedures pertaining to the IDDE program. 2. Revise procedures to align them with the requirements of the Small MS4 General NPDES Permit.
Milestone Year 1	Continue existing IDDE program using current City IDDE procedures.
Milestone Year 2	Continue existing IDDE program using current City IDDE procedures. Assess and revise City IDDE procedures.
Milestone Year 3	Continue IDDE program using revised City IDDE procedures.
Milestone Year 4	Continue IDDE program using revised City IDDE procedures.
Milestone Year 5	Continue IDDE program using revised City IDDE procedures.

SECTION 3: CONSTRUCTION SITE STORMWATER RUNOFF PROGRAM

Additional BMPs

BMP	Name	DESCRIPTION
3E	MS4 staff training	City inspectors will maintain certification under the Tennessee Fundamentals of Erosion Prevention and Sediment Control Course (Level 1). City construction site plan reviewers will maintain certification from the Tennessee Erosion Prevention and Sediment Control Design Course (Level 2). These courses will be taken by City staff at the frequency required to maintain certifications.

BMP 3E	MEASURABLE GOALS AND MILESTONES
Goal(s)	1. Maintain Level 1 certification for all City construction site inspectors responsible for erosion prevention and sediment control inspections. 2. Maintain Level 2 certification for all City construction plan reviewers that are responsible for reviewing stormwater and erosion prevention and sediment control designs.
Milestone Year 1	Maintain staff certifications.
Milestone Year 2	Maintain staff certifications.
Milestone Year 3	Maintain staff certifications.

Milestone Year 4	Maintain staff certifications.
Milestone Year 5	Maintain staff certifications.

SECTION 4: PERMANENT STORMWATER MANAGEMENT PROGRAM

Additional BMPs

BMP	Name	DESCRIPTION
4E	BMP Inventory	An inventory for permanent stormwater management BMPs will be developed in accordance with the requirements of section 4.2.5.6 of the Small MS4 General NPDES Permit. The inventory will be updated on an annual basis, or as development/redevelopment and inspections occur, whichever is determined more appropriate for the City's land development and post-construction inspection processes.
4F	Codes and Ordinances Review and Update	Local codes and ordinances will be reviewed using the EPA Water Quality Scorecard. Based on the outcome of the review, codes and ordinances will be updated within 4 years of coverage under the Small MS4 General NPDES Permit.

BMP 4E	MEASURABLE GOALS AND MILESTONES
Goal(s)	1. Develop the BMP inventory within 180 days of coverage under the Small MS4 General NPDES Permit. 2. Maintain the inventory on an annual basis.
Milestone Year 1	Develop BMP inventory.
Milestone Year 2	Maintain inventory.
Milestone Year 3	Maintain inventory.
Milestone Year 4	Maintain inventory.
Milestone Year 5	Maintain inventory.
BMP 4F	**MEASURABLE GOALS AND MILESTONES**
Goal(s)	1. Review local codes and ordinances using the EPA Water Quality Scorecard within one year of obtaining coverage under the Small MS4 General NPDES Permit. 3. Update local codes and ordinances as appropriate and identified during the review within 4 years of obtaining coverage under the Small MS4 General NPDES Permit.
Milestone Year 1	No action.
Milestone Year 2	Complete EPA Water Quality Scorecard within one year of permit coverage (approximately January 2012). Submit a completed copy of the EPA Water Quality Scorecard with the Permit Year 2 Annual Report.
Milestone Year 3	No action unless otherwise specified by the results of the codes and ordinances review.
Milestone Year 4	No action unless otherwise specified by the results of the codes and ordinances review.

Milestone Year 5	Have local codes and ordinances fully updated as deemed appropriate based on the codes and ordinances review within four years of permit coverage (approximately January 2015).