City of Millersville

1246 Louisville Highway
Millersville, TN 37072-3613
Phone: (615) 859-0880
Fax: (615) 851-1825

November 10, 2015

Mr. Robert Karesh
Statewide MS4 Coordinator
711 R.S. Gass Boulevard
Nashville, Tennessee 37216

Dear Mr. Karesh:

Pursuant to the NPDES Permit #TNS077887, please find the Draft Annual Report for the City of Millersville.

A public hearing is scheduled for December 20, 2016 and the draft report will be available for public comment until that time. The schedule for reporting was misunderstood because the last page of the report form states "Annual reports must be submitted to the appropriate Environmental Field Office (EFO) by January 31 of each calendar year...". We now understand that this report was to be submitted by September 30 and will be sure that next year's report is submitted on-time.

The City has established goals to significantly improve our stormwater program going forward. With our newly established stormwater utility (effective April 2016), we now have a meaningful source of funding that will allow us to take a more aggressive approach to managing our MS4. Areas of concern that will be of utmost importance and focus for Millersville will be public education and participation, hot spots, illicit discharges, outfall inspections, construction site monitoring and BMP inspections.

Respectfully Submitted,

Caryn Miller, MPA
City Manager

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
(615) 532-0625

Municipal Separate Storm Sewer System (MS4) Annual Report

1. MS4 INFORMATION

City of Millersville — TNS 077887
Name of MS4 — MS4 Permit Number

Caryn Miller, City Manager — CityManager@cityofmillersville.com
Name of Contact Person — Email Address

615.859.0880
Telephone (including area code)

1246 Louisville Highway
Mailing Address

Millersville — TN — 37072
City — State — ZIP code

What is the current population of your MS4? *6,700 (http://www.census.gov/quickfacts/table/PST045215/4748980)*

What is the reporting period for this annual report? *July 1, 2015 to June 30,2016*

2. WATER QUALITY PRIORITIES (SECTION 3.1)

A. Does your MS4 discharge into waters listed as impaired on TN's most current 303(d) list and/or according to the on-line GIS mapping tool? If yes, please attach a list all impaired waters within your jurisdictional area. ■ Yes ☐ No

B. Does your MS4's jurisdictional area contain any waterbodies where a TMDL has been approved for parameters other than pathogens, siltation and habitat alterations? If yes, please attach a list. ☐ Yes ■ No

C. What specific sources of these pollutants of concern are you targeting?
Construction activity, sanitary sewer exfiltration and overflow, residential activity

D. Do you have discharges to any Exceptional TN Waters (ETWs) or Outstanding National Resource Waters (ONRWs)? If yes, please attach a list. ☐ Yes ■ No

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

3. PROTECTION OF STATE OR FEDERALLY LISTED SPECIES (SECTION 3.2.1 General Permit for Phase II MS4s)

A. Are there any state or federally listed species within the MS4's jurisdiction? ■ Yes ☐ No

B. Are any of the MS4 discharges or discharge-related activities likely to jeopardize any state or federally listed species? ☐ Yes ■ No

C. Please attach any authorizations or determinations by U.S. Fish & Wildlife Service on the effect of the MS4 discharges on state or federally listed species.

4. PUBLIC EDUCATION AND PUBLIC PARTICIPATION (SECTION 4.2.1 AND 4.2.2)

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

B. Is your public education program targeting specific pollutants and sources of those pollutants, such as Hot Spots?. ■ Yes ☐ No

C. If yes, what are the specific causes, sources and/or pollutants addressed by your public education program? *Please see attachment*

D. Note specific successful outcome(s) (NOT tasks, events, publications) fully or partially attributable to your public education program during this reporting period. *Please see attachment*

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

F. How do you facilitate, advertise, and publicize public involvement and participation opportunities? *Please see attachment*

G. Do you have a webpage dedicated to your stormwater program? If so, what is the link/URL: *www.cityofmillersville.com/department/index.php?structureid=23* ■ Yes ☐ No

H. Are you tracking and maintaining records of public education, outreach, involvement and participation activities? Please attach a summary of these activities. ☐ Yes ■ No

5. ILLICIT DISCHARGE DETECTION AND ELIMINATION (SECTION 4.2.3)

A. Have you completed a map of all outfalls and receiving waters of your storm sewer system? *Please see attachment* ■ Yes ☐ No

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

C. How many outfalls have you identified in your system? *36*

D. Have any of these outfalls been screened for dry weather discharges? ■ Yes ☐ No

E. What is your frequency for screening outfalls for illicit discharges? *Please see attachment*

F. Do you have an ordinance that effectively prohibits illicit discharges? ■ Yes ☐ No

G. During this reporting period, how many illicit discharges/illegal connections have you discovered (or been reported to you?) *0*

H. Of those illicit discharges/illegal connections that have been discovered or reported, how many have been eliminated? *N/A*

6. CONSTRUCTION SITE STORMWATER RUNOFF (SECTION 4.2.4)

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

Erosion and sediment control requirements?	■ Yes	☐ No
Other construction waste control requirements?	■ Yes	☐ No
Requirement to submit construction plans for review?	■ Yes	☐ No
MS4 enforcement authority?	■ Yes	☐ No

B. How many active construction sites disturbing at least one acre were there in your jurisdiction this reporting period? *1*

C. How many of these active sties did you inspect this reporting period? *1*

D. On average, how many times each, or with what frequency, were these sites inspected (e.g., weekly, monthly, etc.)? *Bi-weekly +/-*

E. Do you prioritize certain construction sites for more frequent inspections? ☐ Yes ■ No
If yes, based on what criteria?

7. PERMANENT STORMWATER CONTROLS (SECTION 4.2.5)

A. Do you have an ordinance or other mechanism to require:

Site plan reviews of all new and redevelopment projects?	■ Yes	☐ No
Maintenance of stormwater management controls?	■ Yes	☐ No
Retrofitting of existing BMPs with green infrastructure BMPs?	☐ Yes	■ No

B. What is the threshold for new/redevelopment stormwater plan review? (e.g., all projects, projects disturbing greater than one acre, etc). *All projects that require site plan approval.*

C. Have you implemented and enforced performance standards for permanent stormwater controls? ■ Yes ☐ No

D. Do these performance standards go beyond the requirements found in Section 4.2.5.2 and require that predevelopment hydrology be met for:

Flow volumes	☐ Yes	■ No
Peak discharge rates	☐ Yes	■ No
Discharge frequency	☐ Yes	■ No
Flow duration	☐ Yes	■ No

E. Please provide the URL/reference where all permanent stormwater management standards can be found.
http://www.cityofmillersville.com/department/index.php?structureid=23

F. How many development and redevelopment project plans were reviewed for this reporting period? *3*

G. How many development and redevelopment project plans were approved? *3*

H. How many permanent stormwater management practices/facilities were inspected? *0*

I. How many were found to have inadequate maintenance? *N/A*

J. Of those, how many were notified and remedied within 30 days? (If window is different than 30 days, please specify.) *N/A*

K. How many enforcement actions were taken that address inadequate maintenance? *0*

L. Do you use an electronic tool (e.g., GIS, database, spreadsheet) to track post-construction BMPs, inspections and maintenance? ☐ Yes ■ No

M. Do all municipal departments and/or staff (as relevant) have access to this tracking system? ☐ Yes ■ No

N. Has the MS4 developed a program to allow for incentive standards for this redeveloped sites? ☐ Yes ■ No

O. How many maintenance agreements has the MS4 approved during the reporting period? *0*

8. Codes and Ordinances Review and Update (Section 4.2.5.3)

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

B. Include status of implementation of code, ordinance and/or policy revisions associated with permanent stormwater management. *No revisions occurred.*

9. Stormwater Management for Municipal Operations (Section 4.2.6)

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

All parks, ball fields and other recreational facilities	■ Yes	☐ No
All municipal turf grass/landscape management activities	■ Yes	☐ No
All municipal vehicle fueling, operation and maintenance activities	■ Yes	☐ No
All municipal maintenance yards	■ Yes	☐ No
All municipal waste handling and disposal areas	■ Yes	☐ No

B. Are stormwater inspections conducted at these facilities? ■ Yes ☐ No

If yes, at what frequency are inspections conducted? *Monthly*

C. Have standard operating procedures or BMP's been developed for all MS4 field activities? (e.g, road repairs, catch basin cleaning, landscape management, etc). ■ Yes ☐ No

D. Do you have a prioritization system for storm sewer system and permanent BMP inspections? ■ Yes ☐ No

E. On average, how frequently are catch basins and other inline treatment systems inspected? *Annually and upon notification of needed maintenance.*

F. On average, how frequently are catch basins and other inline treatment system cleaned out/maintained? *As needed.*

G. Do municipal employees in all relevant positions and departments receive comprehensive training on stormwater management? ■ Yes ☐ No

H. If yes, do you also provide regular updates and refreshers? ■ Yes ☐ No

If so, how frequently and/or under what circumstances? *Annually and for new hires.*

10. Stormwater Management Program Update (Section 4.4)

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

Changes adding (but not subtracting or replacing) components, controls or other requirements (Section 4.4.2.a). *N/A*

Changes to replace an ineffective or unfeasible BMP (Section4.4.2b) *N/A*

Information (eg. additional acreage, outfalls, BMP's) on program area expansion based on annexation or newly urbanized areas. *N/A*

Changes to the program as required by the division (Section 4.4.3). *N/A*

11. Evaluating/Measuring Progress

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

Indicator	Began Tracking (year)	Frequency	Number of Locations
Example: E. coli	2003	Weekly April–September	20

B. Provide a summary of data (e.g., water quality information, performance data, modeling) collected in order to evaluate the performance of permanent stormwater controls installed throughout the system. This evaluation may include a comparison of current and past permanent stormwater

12. ENFORCEMENT

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

Action	Construction	Permanent Stormwater Controls	Illicit Discharge	Authority?	
Notice of violation	# 2	#_____	#_____	■ Yes	☐ No
Administrative fines	#_____	#_____	#_____	■ Yes	☐ No
Stop Work Orders	#_____	#_____	#_____	■ Yes	☐ No
Civil penalties	#_____	#_____	#_____	■ Yes	☐ No
Criminal actions	#_____	#_____	#_____	■ Yes	☐ No
Administrative orders	#_____	#_____	#_____	■ Yes	☐ No
Other	#	#	#		

B. Do you use an electronic tool (e.g., GIS, data base, spreadsheet) to track the locations, inspection results, and enforcement actions in your jurisdiction? ☐ Yes ■ No

C. What are the 3 most common types of violations documented during this reporting period? *Please see attachment*

13. PROGRAM RESOURCES (OPTIONAL)

A. What was your annual expenditure to implement the requirements of your MS4 NPDES permit and SWMP this past reporting period? *$30,743*

B. What is next year's budget for implementing the requirements of your MS4 NPDES permit and SWMP? *$198,894*

C. Do you have an independent financing mechanism for your stormwater program? ■ Yes ☐ No

D. If so, what is it/are they (e.g., stormwater fees), and what is the annual revenue derived from this mechanism?

Source: *Stormwater Utility* Amount $ *165,000*

Source: Amount $

E. How many full time employees does your municipality devote to the stormwater program (specifically for implementing the stormwater program vs. municipal employees with other primary responsibilities that dovetail with stormwater issues)? *None, Please see attachment*

F. Do you share program implementation responsibilities with any other entities? ☐ Yes ■ No

Entity	Activity/Task/Responsibility	Your Oversight/Accountability Mechanism

G. Please attach a copy of your Organizational Chart

Small Municipal Separate Storm Sewer System (MS4) Annual Report

APPENDIX

This report must be signed by a ranking elected official or by a duly authorized representative of that person. See signatory requirements in sub-part 6.7.2 of the permit.

"I certify under penalty of law that this document and all attachments were prepared 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."

Caryn Miller, City Manager		11/10/2016
Printed Name and Title	Signature	Date

Annual reports must be submitted in accordance with the requirements of subpart 5.4. (Reporting) of the permit. Annual reports must be submitted to the appropriate Environmental Field Office (EFO) by January 31 of each calendar year, as shown in the table below:

EFO	Street Address	City	Zip Code	Telephone
Chattanooga	1301 Riverfront Parkway, Ste 206	Chattanooga	37402	(423) 634-5745
Columbia	1421 Hampshire Pike	Columbia	38401	(931) 380-3371
Cookeville	1221 South Willow Ave.	Cookeville	38506	(931) 432-4015
Jackson	1625 Hollywood Drive	Jackson	38305	(731) 512-1300
Johnson City	2305 Silverdale Road	Johnson City	37601	(423) 854-5400
Knoxville	3711 Middlebrook Pike	Knoxville	37921	(865) 594-6035
Memphis	8383 Wolf Lake Drive	Bartlett	38133	(901) 371-3000
Nashville	711 R S Gass Boulevard	Nashville	37216	(615) 687-7000

2. Water Quality Priorities (Section 3.1)

A. Per the "Year 2014 303(d) List" dated May 2016: Impaired waters: Both are listed in the Cheatham Reservoir Watershed.

- TN05130202 220-1000 Manskers Creek
  Loss of biological integrity due to siltation
- TN05130202 220-2000 Manskers Creek
  Loss of biological integrity due to siltation, Low dissolved oxygen
- TN05130202 220-0300 Slaters Creek
  Loss of biological integrity due to siltation

4. Public Education and Public Participation (Section 4.2.1 and 4.2.2)

C. Petroleum-Based Products, Roof-top Runoff, Pesticides, Chemicals, Soil Erosion, Fertilizers, Household cleaners, E. coli, Trash and Debris, Illegal Dumping, Grass and other yard debris, Grease and other food waste

D. We continue to receive comments from citizens about the creeks being cleaner and wildlife sightings. Additionally, we have noticed increased participation in community clean up events. There have been less instances of notices of violations, which can be partially attributed to better awareness of stormwater protection.

E. The cities of Millersville and Goodlettsville have teamed up to provide an expanded opportunity for local citizens to participate in a water quality improvement program.

The Stream Watch program was established as a means of opportunity for concerned citizens to meet on a regular basis to report and discuss water quality issues regarding their local streams and waterways. Volunteers monitor the local streams in various capacities including: trash pickup, illegal dumping, excessive siltation, recognizing unhealthy aquatic life, measuring Dissolved Oxygen, pH (acidity), turbidity (clarity), and water temperature.

Participants have a hands-on opportunity to assist with stream clean-ups, environmentally-based festivals, water testing, reporting illegal dumping, etc. – all in an effort to help clean up, keep clean and restore health to our local waters.

F. Advertisements are placed on the city's website, local cable channel, and sewer bills. Postcards are sent to citizens in the local area. Large signs are posted on-site in advance of clean up events.

G. http://www.cityofmillersville.com/department/index.php?structureid=23

H. Tracking of participation has been performed in the past, but unfortunately limited records of participation and outreach has been logged for this reporting period. Currently, we are developing and implementing a streamlined process for maintaining better records for these activities.

5. Illicit Discharge Detection and Elimination (Section 4.2.3)

A. The City has paper maps of outfalls, culverts, and storm drains in the City. However, the age and accuracy is unknown. We are currently in the process of remapping the City's stormwater features, utilizing GIS technology. For this reporting period, we mapped a total of 17 outfalls along Mansker Creek.

C. Old records have indicated that there are 36 outfalls within the system, however it is believed this number may be inaccurate. We will update the total once all outfall mapping has been completed.

D. The 17 outfalls that were mapped during this period were also inspected. Inspection reports were completed and no dry weather discharges were observed.

E. It is our goal to inspect each outfall annually.

11. Evaluating/Measuring Progress

Monitoring of Dissolved Oxygen, Turbidity, Water Temperature, and pH began in 2008; macro-invertebrate monitoring began in 2010. However, these programs have not continued since the departure of our full-time stormwater coordinator. It is our goal to reinstate these monitoring activities in the coming year.

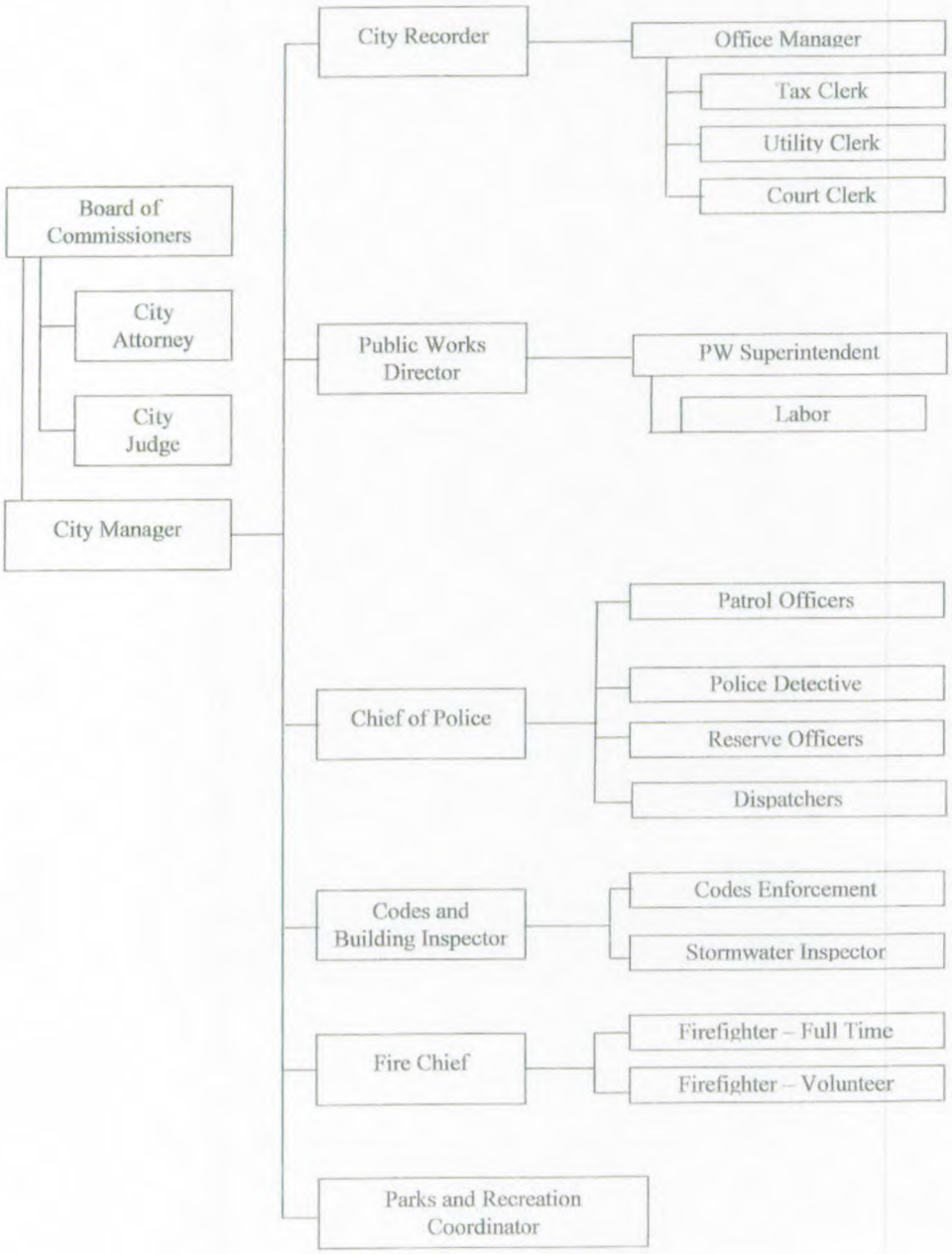
12. Enforcement

C. Silt from development sites, pipes leading to stream, Maintenance of BMPs

13. Program Resources (Optional)

C. Stormwater Utility has been established and became effective in April 2016. This new source of revenue should allow for more resource allocation for implementation and advancement of the City's stormwater program.

E. No full time employees are currently primarily responsible for stormwater. The Codes Enforcement officer and the recently hired Development Services Coordinator will be responsible for implementing the program, and will work closely with our engineering consultant for technical assistance.

G.

Millersville Employee Organizational Chart as of 6/1/2015