



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
 1-888-891-8332 (TDEC)

Phase II Small Municipal Separate Storm Sewer System (MS4) Annual Report

1. MS4 Information

Name of MS4: City of Goodlettsville		MS4 Permit Number: TNS075345
Contact Person: Warren Garrett		Email Address: wgarrett@goodlettsville.gov
Telephone: (615) 859-2740		MS4 Program Web Address: www.goodlettsville.gov
Mailing Address: 105 S. Main Street		
City: Goodlettsville	State: Tennessee	ZIP code: 37072

What is the current population of your MS4? 16,950

What is the reporting period for this annual report? July 1 2017 to June 30 2018

2. Discharges to Waterbodies with Unavailable Parameters or Exceptional Tennessee Waters (Section 3.1)

- A. Does your MS4 discharge into waters with unavailable parameters (previously referred to as impaired) for pathogens, nutrients, siltation or other parameters related to stormwater runoff from urbanized areas as listed on TN's most current 303(d) list and/or according to the on-line state GIS mapping tool (tdeconline.tn.gov/dwr/)? If yes, attach a list. Yes No
- B. Are there established and approved TMDLs (<http://www.tn.gov/environment/article/wrws-tennessees-total-maximum-daily-load-tmdl-program>) with waste load allocations for MS4 discharges in your jurisdiction? If yes, attach a list. Yes No
- C. Does your MS4 discharge to any Exceptional Tennessee Waters (ETWs - http://environment-online.tn.gov:8080/pls/enf_reports/f?p=9034:34304:4880790061142)? If yes, attach a list. Yes No
- D. Are you implementing specific Best Management Practices (BMPs) to control pollutant discharges to waterbodies with unavailable parameters or ETWs? If yes, describe the specific practices: We are implementing an annual stream assessment with graphs coordinated through Western Kentucky University, we will also contract with the University to provide bi-annual WQ testing. Our goal is to track and monitor all pollutants that enter our streams and pinpoint where the pollutants come from. This data will be provided to TDEC on an annual basis for analysis and will be detailed in our end of permit report. This is in addition to our 6 minimum measures as required, and our public works infrastructure maintenance program. Yes No

3. Public Education/Outreach and Involvement/Participation (Sections 4.2.1 and 4.2.2)

- A. Have you developed a Public Information and Education plan (PIE)? Yes No

- B. Is your public education program targeting specific pollutants and sources, such as Hot Spots? If yes, describe the specific pollutants and/or sources targeted by your public education program: Our target audiences have been addressed in a broad sense on our website which allows us to provide information to virtually all of our citizens. Although we provide this information, we know only a certain number of population will read it or research certain concerns. We are now providing information via mail directly to residents for good housekeeping via a flyer "Residents Guide to Clean Water". We also provide verbal education to landscapers regarding grass clipping removal or mulching. We provide the following on an annual basis. Hotspots are tracked by the Inspector through quarterly reports received from targeted businesses. we also installed an Oil Recycling facility at public works to help inform the public of proper recycling and avoidance of oil dumping. Yes No
- C. Do you have a webpage dedicated to your stormwater program? If yes, provide a link/URL: www.goodlettsville.gov Yes No
- D. Summarize how you advertise and publicize your public education, outreach, involvement and participation opportunities: Website, Facebook, Email, Notify Me Program, TAB, Tailgate Wrap.
- E. Summarize the public education, outreach, involvement and participation activities you completed during this reporting period:
1. Mid Tennessee Stormwater Group
 2. Waterfest via Cumberland River Compact.
 3. Businesss Educational Literature mailed.
 4. Residential Educational Literature mailed.
 5. TNSA Urban Runoff 5K
 6. Lego Leauge/WKU Stormwater Education
 7. Walk Across Sumner Event
 8. Stormwater Tailgate wrap for education and hotline #
 9. Online Water Education Video.
 10. TAB program
 11. Community Advisory Panel
 12. Stormwater Citizens Academy
 13. Community Stream Cleanup Events.
 14. 250K Tree Day
 15. Adopt-A-Street Program

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F. Summarize any specific successful outcome(s) (e.g., citizen involvement, pollutant reduction, water quality improvement, etc.) fully or partially attributable to your public education and participation program during this reporting period: September 9, 2017--Stream Cleanup Event Totals:

Williamson Road/Mansker Creek (Millersville)

25 full bags of trash and debris, Sleeper sofa, Cabinet doors, Mountain bike , Balled up barbed wire

Wheel and tire, Plastic lawn furniture, Old igloo cooler TOTAL----- 550 lbs.

Dry Creek/Gateway (Goodlettsville)

Bagged litter, pallet, carpet, grille, bike, vegetation TOTAL-----360 lbs.

Dry Creek/Old Dickerson (Goodlettsville)

Wood, wire, propane tank, metal lid and 5 bags litter removed from creek. TOTAL----- 250 lbs.

Slaters Creek (Millersville)

20 plus foot of a telephone pole under a private driveway bridge. Plastic roll around mechanic style tool box, 19 full bags of trash and debris, 2x4 sheet of metal roofing material, 5- 10 ft. pieces of old discarded bridge decking

Aquatic life--Large snapping turtle and several snakes □ TOTAL-----500 lbs.

Dickerson Pike North (Goodlettsville)

11 bags litter. TOTAL-----110 lbs.

Two Mile Pike/Hollywood St./Drake St. (Goodlettsville)

6,000 lbs. brush and vegetation removal from wet weather

conveyances/tributaries. TOTAL-----6,000 lbs.

TOTAL OF COMBINED LOCATIONS-----7,770 lbs.

June 9, 2018--Stream Cleanup Event Totals:

Slaters Creek (Millersville)

6 car tires, Misc. car parts, 1 car battery, broken house furniture, Misc. lumber, 2 bikes, childrens toys, house siding and lots of plastic trash bags. TOTAL----- 345 lbs.

Dry Creek Tributary @ Hasty Ln. (Goodlettsville)

Brush Debris and dead fall removal, Plastic PVC Pipe, 2 bags litter TOTAL-----2,030 lbs.

Mansker Creek @ Northcreek (Goodlettsville)

Metal beach chair, Rug, Plastic PVC Pipe, Trash Can, Brush and Debris, 200 Gallon Plastic Tank, Wood Fence Frame, 5 Car Tires, 22 Trash Bags, Concrete Post, 2 Metal Wheels TOTAL-----400 lbs.

TOTAL OF COMBINED LOCATIONS-----2,775 lbs.

4. Illicit Discharge Detection and Elimination (Section 4.2.3)

- A. Have you developed and do you continue to update a storm sewer system map that shows the location of system outfalls where the municipal storm sewer system discharges into waters of the state or conveyances owned or operated by another MS4? Yes No
- B. If yes, does the map include inputs into the storm sewer collection system, such as the inlets, catch basins, drop structures or other defined contributing points to the sewershed of that outfall, and general direction of stormwater flow? Yes No
- C. How many outfalls have you identified in your storm sewer system? 131 Outfalls from previous data. We are currently updating a new GIS system Web Based and will provide more accurate data in 2018-19.

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D. Do you have an ordinance, or other regulatory mechanism, that prohibits non-stormwater discharges into your storm sewer system?

Yes

No

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E. Have you implemented a plan to detect, identify and eliminate non-stormwater discharges, including illegal disposal, throughout the storm sewer system? If yes, provide a summary: 18-309. Illicit discharges.

(1) Scope. This section shall apply to all water generated on developed or undeveloped land entering the city's separate storm sewer system.

(2) Prohibition of illicit discharges. No person shall introduce or cause to be introduced into the municipal separate storm sewer system any discharge that is not composed entirely of stormwater or any discharge that flows from stormwater facility that is not inspected in accordance with § 16-506 shall be an illicit discharge. Non-stormwater discharges shall include, but shall not be limited to, sanitary wastewater, commercial car wash wastewater, lawn mowing debris, lawn care chemicals, grease, soap, cleaning chemicals, radiator flushing disposal, spills from vehicle accidents, carpet cleaning wastewater, effluent from septic tanks, improper oil disposal, laundry wastewater/gray water, improper disposal of auto and household toxics. The commencement, conduct or continuance of any non-stormwater discharge to the municipal separate storm sewer system is prohibited except as described as follows:

(a) Uncontaminated discharges from the following sources:

(i) Water line flushing or other potable water sources;

(ii) Landscape irrigation or lawn watering with potable water;

(iii) Diverted stream flows;

(iv) Rising ground water;

(v) Groundwater infiltration to storm drains;

(vi) Pumped groundwater; (vii) Foundation or footing drains;

(viii) Crawl space pumps;

(ix) Air conditioning condensation;

(x) Springs; (xi) Non-commercial washing of vehicles;

(xii) Natural riparian habitat or wetland flows;

(xiii) Swimming pools (if dechlorinated - typically less than one (1) PPM chlorine);

(xiv) Firefighting activities;

(xv) Any other uncontaminated water source.

(b) Discharges specified in writing by the city as being necessary to protect public health and safety.

(c) Dye testing is an allowable discharge if the city has so specified in writing.

(d) Discharges authorized by the Construction General Permit (CGP), which comply with section 3.5.9 of the same:

(i) Dewatering of work areas of collected stormwater and ground water (filtering or chemical treatment may be necessary prior to discharge);

(ii) Waters used to wash vehicles (of dust and soil, not process materials such as oils, asphalt or concrete) where detergents are not used and detention and/or filtering is provided before the water leaves site; (iii) Water used to control dust in accordance with CGP section 3.5.5;

(iv) Potable water sources including waterline flushings from which chlorine has been removed to the maximum extent practicable;

(v) Routine external building washdown that does not use detergents or other chemicals;

(vi) Uncontaminated groundwater or spring water; and

Yes

No

- (vii) Foundation or footing drains where flows are not contaminated with pollutants (process materials such as solvents, heavy metals, etc.).
- (3) Prohibition of illicit connections. The construction, use, maintenance or continued existence of illicit connections to the municipal separate storm sewer system is prohibited. This prohibition expressly includes, without limitation, illicit connections made in the past, regardless of whether the connection was permissible under law or practices applicable or prevailing at the time of connection.
- (4) Reduction of stormwater pollutants by the use of best management practices. Any person responsible for a property or premises, which is, or may be, the source of an illicit discharge, may be required to implement, at the person's expense, the BMPs necessary to prevent the further discharge of pollutants to the municipal separate storm sewer system. Compliance with all terms and conditions of a valid NPDES permit authorizing the discharge of stormwater associated with industrial activity, to the extent practicable, shall be deemed in compliance with the provisions of this section. Discharges from existing BMPs that have not been maintained and/or inspected in accordance with this ordinance shall be regarded as illicit.
- (5) Notification of spills. Notwithstanding other requirements of law, as soon as any person responsible for a facility or operation, or responsible for emergency response for a facility or operation has information of any known or suspected release of materials which are resulting in, or may result in, illicit discharges or pollutants discharging into, the municipal separate storm sewer system, the person shall take all necessary steps to ensure the discovery, containment, and cleanup of such release. In the event of such a release of hazardous materials the person shall immediately notify emergency response agencies of the occurrence via emergency dispatch services. In the event of a release of non-hazardous materials, the person shall notify the city in person or by telephone, fax, or email, no later than the next business day. Notifications in person or by telephone shall be confirmed by written notice addressed and mailed to the city within three (3) business days of the telephone notice. If the discharge of prohibited materials emanates from a commercial or industrial establishment, the owner or operator of such establishment shall also retain an on-site written record of the discharge and the actions taken to prevent its recurrence. Such records shall be retained for at least three (3) years.
- (6) No illegal dumping allowed. No person shall dump or otherwise deposit outside an authorized landfill, convenience center or other authorized garbage or trash collection point, any trash or garbage of any kind or description on any private or public property, occupied or unoccupied, inside the city.
- (7) Hot spots. The administrator is authorized to regulate hot spots. Upon written notification by the administrator, the property owner or designated facility manager of a hot spot area shall, at their expense, implement necessary controls and/or best management practices to prevent discharge of contaminated stormwater to the municipal separate storm sewer system. The administrator may require the facility to maintain inspection logs or other records to document compliance with this paragraph. (Ord. #04-651, Jan. 2005, as replaced by Ord. #15-830, Feb. 2015)
- F. How many illicit discharge related complaints were received this reporting period? 14
- G. How many illicit discharge investigations were performed this reporting period? 14
- H. Of those investigations performed, how many resulted in valid illicit discharges that were addressed and/or eliminated? 14

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5. Construction Site Stormwater Runoff Pollutant Control (Section 4.2.4)

- A. Do you have an ordinance or other regulatory mechanism requiring:
- Construction site operators to implement appropriate erosion prevention and sediment control BMPs consistent with those described in the TDEC EPSC Handbook? Yes No
- Construction site operators to control wastes such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste? Yes No
- Design storm and special conditions for unavailable parameters waters or Exceptional Tennessee Waters consistent with those of the current Tennessee Construction General Permit (TNR100000)? Yes No
- B. Do you have specific procedures for construction site plan (including erosion prevention and sediment BMPs) review and approval? Yes No
- C. Do you have sanctions to enforce compliance? Yes No
- D. Do you hold pre-construction meetings with operators of priority construction activities and inspect priority construction sites at least monthly? Yes No
- E. How many construction sites disturbing at least one acre or greater were active in your jurisdiction this reporting period? 8
- F. How many active priority and non-priority construction sites were inspected this reporting period? 84
- G. How many construction related complaints were received this reporting period? Copper Creek II phase V, Copper Creek I Phase II, Dry Creek Rd.

6. Permanent Stormwater Management at New Development and Redevelopment Projects (Section 4.2.5)

- A. Do you have a regulatory mechanism (e.g. ordinance) requiring permanent stormwater pollutant removal for development and redevelopment projects? If no, have you submitted an Implementation Plan to the Division? Yes No
 Yes No
- B. Do you have an ordinance or other regulatory mechanism requiring:
- Site plan review and approval of new and re-development projects? Yes No
- A process to ensure stormwater control measures (SCMs) are properly installed and maintained? Yes No

Permanent water quality riparian buffers? If yes, specify requirements: 18-306. Buffer zones. The goal of the water quality buffer is to preserve undisturbed vegetation that is native to the streamside habitat in the area of the project. Vegetated, preferably native, water quality buffers protect water bodies by providing structural integrity and canopy cover, as well as stormwater infiltration, filtration and evapotranspiration. Buffer width depends on the size of a drainage area. Streams or other waters with drainage areas less than one (1) square mile will require buffer widths of thirty feet (30') minimum. Streams or other waters with drainage areas greater than one (1) square mile will require buffer widths of sixty feet (60') minimum. The sixty feet (60') criterion for the width of the buffer zone can be established on an average width basis at a project, as long as the minimum width of the buffer zone is more than thirty feet (30') at any measured location. The MS4 must develop and apply criteria for determining the circumstances under which these averages will be available. A determination that standards cannot be met may not be based solely on the difficulty or cost associated with implementation. Every attempt should be made for development and redevelopment activities not to take place within the buffer zone. If water quality buffer widths as defined above cannot be fully accomplished on-site, the MS4 must develop and apply criteria for determining the circumstances under which alternative buffer widths will be available. A determination that water quality buffer widths cannot be met on site may not be based solely on the difficulty or cost of implementing measures, but must include multiple criteria, such as: type of project, existing land use and physical conditions that preclude use of these practices.

Buffer zone requirements:

(1) "Construction" applies to all streams adjacent to construction sites, with an exception for streams designated as impaired or Exceptional Tennessee waters, as designated by the Tennessee Department of Environment and Conservation. A thirty foot (30') foot natural riparian buffer zone adjacent to all streams at the construction site shall be preserved, to the maximum extent practicable, during construction activities at the site. The water quality buffer zone is required to protect waters of the state located within or immediately adjacent to the boundaries of the project, as identified using methodology from standard operating procedures for hydrologic determinations (see rules to implement a certification program for qualified hydrologic professionals, Tennessee Rules chapter 0400-40-17). Buffer zones are not primary sediment control measures and should not be relied on as such. Rehabilitation and enhancement of a natural buffer zone is allowed, if necessary, for improvement of its effectiveness of protection of the waters of the state. The buffer zone requirement only applies to new construction sites. The riparian buffer zone should be preserved between the top of stream bank and the disturbed construction area. The thirty (30) feet criterion for the width of the buffer zone can be established on an average width basis at a project, as long as the minimum width of the buffer zone is more than fifteen feet (15') at any measured location.

Yes

No

Buffer zone requirements for discharges into impaired or high quality waters: A sixty foot (60') natural riparian buffer zone adjacent to the receiving stream designated as impaired or high quality waters shall be preserved, to the maximum extent practicable, during construction activities at the site. The water quality buffer zone is required to protect waters of the state (e.g., perennial and intermittent streams, rivers, lakes, wetlands) located within or immediately adjacent to the boundaries of the project, as identified on a 7.5-minute USGS quadrangle map, or as determined by the director. Buffer zones are not sediment control measures and should not be relied upon as primary sediment control measures. Rehabilitation and enhancement of a natural buffer zone is allowed, if necessary, for improvement of its effectiveness of protection of the

waters of the state. The buffer zone requirement only applies to new construction sites. The riparian buffer zone should be established between the top of stream bank and the disturbed construction area. The sixty feet (60') criterion for the width of the buffer zone can be established on an average width basis at a project, as long as the minimum width of the buffer zone is more than twenty-five (25') at any measured location.

(2) "Permanent" new development and significant redevelopment sites are required to preserve water quality buffers along waters within the MS4. Buffers shall be clearly marked on site development plans, grading permit applications, and/or concept plans. Buffer width depends on the size of a drainage area. Streams or other waters with drainage areas less than one (1) square mile will require buffer widths of thirty feet (30') minimum. Streams or other waters with drainage areas greater than 1 square mile will require buffer widths of sixty feet (60') minimum. The sixty feet (60') criterion for the width of the buffer zone can be established on an average width basis at a project, as long as the minimum width of the buffer zone is more than thirty feet (30') at any measured location. (Ord. #04-651, Jan. 2005, as replaced by Ord. #15-830, Feb. 2015)

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- C. What is the threshold for development and redevelopment project plans plan review (e.g., all projects, projects disturbing greater than one acre, etc.)? 18-305. Stormwater system design: construction and permanent stormwater management performance standards. (1) Applicability. This section shall be applicable to all land development, including, but not limited to, site plan applications, subdivision applications, land disturbance applications and grading applications. The requirements in this section shall apply to any new development or redevelopment site that meets one or more of the following criteria:
- (a) One (1) acre or more:
 - (i) New development that involves land disturbance activities of one (1) acre or more;
 - (ii) Redevelopment that involves other land disturbance activity of one (1) acre or more;
 - (b) Developments and redevelopments less than one acre of total land disturbance may also be required to obtain authorization under this ordinance if:
 - (i) The administrator has determined that the stormwater discharge from a site is causing, contributing to, or is likely to contribute to a violation of a state water quality standard;
 - (ii) The administrator has determined that the stormwater discharge is, or is likely to be a significant contributor of pollutants to waters of the state; or
 - (iii) Any new development or redevelopment, regardless of size, that is defined by the administrator to be a hotspot land use.
 - (c) Other options:
 - i) Change in elevation of property.
 - (ii) Any land disturbance that requires coverage under a TDEC construction general permit. (iii) Any disturbance that requires coverage under a TDEC ARAP.
- (2) General requirements. Stormwater at applicable developments and redevelopments shall be managed in accordance with the requirements contained within this section.
- (a) Any discharge of stormwater or other fluid to an improved sinkhole or other injection well, as defined, must be authorized by permit or rule as a Class V underground injection well under the provisions of Tennessee Department of Environment and Conservation (TDEC) Rules, chapter 1200-4-6.
 - (b) Stormwater design or BMP manuals.
 - (i) Adoption. The city adopts as its MS4 stormwater design and Best Management Practices (BMP) manuals for stormwater management, construction and permanent, the following publications, which are incorporated by reference in this ordinance as if fully set out herein:
 - (A) TDEC Erosion Prevention and Sediment Control Handbook; most current edition.
 - (B) Tennessee Permanent Stormwater Management and Design Guidance Manual; most current edition. (C) Metro Nashville Stormwater Management Manual Volume 5, Low Impact Development
 - (D) And/or a collection of city approved BMPs.
 - (ii) The publications listed above include a list of acceptable BMPs including the specific design performance criteria and operation and maintenance requirements. These include city approved BMPs for permanent stormwater management including green infrastructure BMPs.
 - (iii) Stormwater facilities that are designed, constructed and maintained in accordance with these publications will be presumed to meet the minimum water quality performance standards.
 - (c) Submittal of a copy of the NOC, SWPPP and NOT to the local MS4
 - (i) Permittees who discharge stormwater through an NPDES-permitted Municipal Separate Storm Sewer System (MS4) who are not exempted in section 1.4.5 (permit coverage through qualifying local program) of TDEC's Construction General Permit (CGP) must provide proof of coverage under the Construction General Permit (CGP); submit a copy of the Stormwater Pollution Prevention Plan (SWPPP); and at project completion, a copy of the signed Notice of Termination (NOT) to the administrator. Permitting status of all permittees covered (or

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previously covered) under this general permit as well as the most current list of all MS4 permits is available at the TDEC's data viewer web site.

(ii) Copies of additional applicable local, state or federal permits (i.e.: ARAP, etc.) must also be provided upon request.

(iii) If requested by the city, these permits must be provided before the issuance of any land disturbance permit or the equivalent.

- D. How many development and redevelopment project plans were reviewed for this reporting period? 8
- E. How many development and redevelopment project plans were approved? 8
- F. How many permanent stormwater related complaints were received this reporting period? Copper Creek I Phase II
- G. How many enforcement actions were taken to address improper installation or maintenance? 1
- H. Do you have a system to inventory and track the status of all public and private SCMs installed on development and redevelopment projects? Yes No
- I. Does your program include an off-site stormwater mitigation or payment into public stormwater fund? If yes, specify. Off Site Stormwater Mitigation Yes No

7. Stormwater Management for Municipal Operations (Section 4.2.6)

- A. As applicable, have stormwater related operation and maintenance plans that include information related to maintenance activities, schedules and the proper disposal of waste from structural and non-structural stormwater controls been developed and implemented at the following municipal operations:

- Streets, roads, highways? Yes No
- Municipal parking lots? Yes No
- Maintenance and storage yards? Yes No
- Fleet or maintenance shops with outdoor storage areas? Yes No
- Salt and storage locations? Yes No
- Snow disposal areas? Yes No
- Waste disposal, storage, and transfer stations? Yes No

- B. Do you have a training program for employees responsible for municipal operations at facilities within the jurisdiction that handle, generate and/or store materials which constitute a potential pollutant of concern for MS4s? Yes No

If yes, are new applicable employees trained within six months, and existing applicable employees trained and/or retrained within the permit term? Yes No

8. Reviewing and Updating Stormwater Management Programs (Section 4.4)

- A. Describe any revisions to your program implemented during this reporting period including but not limited to:

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Modifications or replacement of an ineffective activity/control measure. TAB will be replaced with a more efficient program, one that will meet the States standard. We are currently modifying our tracking method of Inspection and Maintenance Agreements, this will now include a civil penalty if report is not received within 2 weeks of due date. We will no longer provide a courtesy letter. The WET program will continue, but may need to be modified in the future if measurable results are not improved.

Changes to the program as required by the division to satisfy permit requirements. Update of SOP and SWPPP Information (e.g. additional acreage, outfalls, BMPs) on newly annexed areas and any resulting updates to your program. Currently remapping infrastrucure and outfalls with GIS, includes new annexation at Allen Rd.

- B. In preparation for this annual report, have you performed an overall assessment of your stormwater management program effectiveness? If yes, summarize the assessment results, and any modifications and improvements scheduled to be implemented in the next reporting period. SUMMARY - STORMWATER PROGRAM - CITY OF GOODLETTSVILLE

CITY OF GOODLETTSVILLE Fiscal Year 2017/18

BMP (Event) & Responsible Party Summary of Results Effective

(1=0%)

(5=100%)

PUBLIC EDUCATION & OUTREACH -- Estimated Population: 16,000

Mid-Tennessee Stormwater Group 5

Cumberland River Compact Waterfest 4

Commercial Business Education through Literature Mail 4

Residential Landscape Education 5

Yes No

TNSA Urban 5K Runoff 4

Lego League Stormwater Education 5

W.E.T. Program Event 3

Walk Across Sumner 5

Western Kentucky University Stormwater Education 5

Tailgate Advertisement Wrap 5

Watershed Education Video 5

T.A.B. Program 1

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85% 51

PUBLIC PARTICIPATION

Community Advisory Panel 5

Citizens Academy 5

Stream Cleanups 5

250k Tree Day 4

Adopt a Street 3

88% 22

CONSTRUCTION SITE RUNOFF CONTROL

Ordinance or other Regulatory Mechanism 5

Construction Sites Residential/Commercial 5

Pre-Con 4

Enforcement Procedures NOV's 4

90% 18

POST-CONSTRUCTION STORMWATER MANAGEMENT

Inspection & Maintenance Agreements 1

Post Inspection Received 1

Enforcement Procedure letters/Civil Penalty 4

40% 6

ILLCIT DISCHARGE DETECTION & ELIMINATION

IDDE Reports/ Letters 5

100% 5

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TOTAL PROGRAM EFFECTIVENESS

Employee Training/ Conferences 5

SOP - Facility Inspections 5

SOP - Standard Operating Procedures 5

SWMP - Storm Water Management Plan 5

PIE - Public Information Education 5

ERP - Enforcement Response Plan 5

100% 30

TOTAL PROGRAM EFFECTIVENESS SCORE 132 of 155 85%

9. Enforcement Response Plan (Section 4.5)

- A. Have you implemented an enforcement response plan that includes progressive enforcement actions to address non-compliance, and allows the maximum penalties specified in TCA 68-221-1106? If no, explain.

Enforcement Response Plan (ERP)

City of Goodlettsville's Stormwater Program

Purpose

The intent of this document is to provide guidance in enforcing the City's existing stormwater management ordinance and to help eliminate illicit discharges to the City's stormwater system.

Documentation

Stormwater ordinances in place are 18-309 and 18-310.

Construction sites that have not issued a Notice of Termination (N.O.T.) are inspected on a routine basis by both the City and the developer. The City's Inspector is the main contact in charge of routine inspections. The City documents construction site inquiry calls to the office. This is documented within the Call Center software database program.

Construction sites that have issued an N.O.T. are required to submit an annual post-construction long-term maintenance agreement report to the City by July 1. The Inspector maintains these files.

Hot Spot/Priority Areas are chosen based on review utilizing the EPA's Hot Spot Site Investigation Form and are required to conduct quarterly inspections and submit those reports to the Inspector. Hot Spot locations are provided with their self-inspection checklist, a suggested list of Best Management Practices (BMPs) and a letter from the Inspector briefly explaining the process.

Yes

No

Citizens are able to report illicit discharges to the Public Works offices via the hotline, website, email, or telephone call to the office. Once received, they are entered into the Call Center database program and emailed to the appropriate personnel for investigation. Personnel have up to seven (7) days to respond to the inquiry.

Drainage infrastructure Information is placed within the GIS system and maps are created identifying potential areas of concern.

Dumping activities are entered into the Call Center database program and are responded to by the Public Works Department. If possible, waste is gone through to determine person(s) responsible for dumping. Should person(s) responsible be prosecuted, prosecution could fall underneath penalties for violating the stormwater ordinance.

When a complaint is received, the inspector and/or public works supervisor or assigned employee checks on the complaint and addresses it accordingly within seven (7) days. Notes are taken and if the information is within Call Center, the follow-up documentation is entered into the system and/or noted completion.

Site Plan Review

Planning Dept. procedure for submittal of Site Plan/Preliminary Master Plan/Final Master Plan

1. Receipt by Planning Dept. of document from specified project engineering company for review and consideration at the published date of the next Planning Commission meeting.

2. A copy of the document/attachment is forwarded to Public Works, Codes, Engineer and Public Works for review.
3. Remaining copies of the document are distributed to staff for review:
 - a. Planning Director
 - b. City Engineer (receives the original stormwater documents attached to document)
 - c. Public Works Director
 - d. Fire Chief
 - e. Codes Director
4. Upon receipt of engineering comments, a staff review meeting is scheduled to discuss outstanding issues of the document relating to all departments.
5. Corrected comments are prepared by the Planning Director and sent to the specified project engineer with a date for resubmittal of the corrected document to the Planning Dept. for final review.
6. Upon receipt of corrected document, the Planning Director will conduct a final review to determine if all outstanding issues have been addressed in accordance with the Goodlettsville Zoning Ordinance and Subdivision Regulations.
7. Copies of the document, any attachments and a staff review report will be delivered to members of the Planning Commission for review prior to the published date of the Planning Commission meeting.

Investigation Procedure

Once City personnel receive an inquiry, they have up to seven (7) days to respond. The inquiry is physically inspected to determine the possible nature of the event. Photographs and a report of the event should be kept on file.

Hot Spot/Priority Area determinations occur routinely and on an as-needed basis. Initially, hot spot/priority areas were determined utilizing the EPA's Hot Spot Identification checklist form. Once an area is deemed a hot spot/priority area, they are notified via a letter and/or meeting with the City advising them of such and explaining the procedure to comply. Hot Spot/Priority Areas are to self-inspect quarterly utilizing a checklist provided to them by the City. The Inspector follows up on the documentation submitted. If documentation raises concerns, the Inspector inspects the property. If the site does not comply, enforcement actions from the stormwater ordinance are in effect.

Dry Weather Screenings occur routinely and on an as-needed basis, photos are taken, and data is entered into the GIS system.

If the City deems necessary, the enforcement section of the stormwater ordinance goes into effect. Follow-up inspections are encouraged to keep tabs on the illicit discharge. Documentation and test results of investigations should include the location(s), date, inspector's name(s), time, parameter(s), sampling result(s), source of flow, etc. As much information that can be obtained should be and be in writing and kept within the Inspector's office.

Should clean-up be required, personnel will advise appropriate City department(s) to assist with clean-up. Hazmat related clean-ups can be handled by (1) the City's fire department, (2) a local environmental clean-up company, and/or (3) TEMA (Tennessee Emergency Management Agency). If materials must be tested, an appropriate testing lab will be consulted. If the source of the illicit discharge can be determined, the responsible party/ies is/are contacted by the City.

Hazardous spills are directed to the City of Goodlettsville Fire Department and they handle the haz-mat emergency per their policy.

Enforcement

Under the authority provided in Tennessee Code Annotated 68-221-1106 it is declared that any person violating the provisions of this article may be assessed a civil penalty by the City of Goodlettsville of not less than fifty dollars (\$50.00) and not more than five thousand dollars (\$5,000.00) per day for each day of violation. Each day of violation shall constitute a separate offense.

Written Notification

The first step in resolving an issue is to provide written notification via a warning letter or email. Within ten (10) days of the receipt date of the notice, an explanation of the violation and a plan for the satisfactory correction and prevention therefore, to include specific required actions, shall be submitted to the Public Works Department. Submission of a plan does not relieve the discharger of any liability for any violations occurring before, during, or after receipt of the notice of violation.

Consent Order

The Administrator is empowered to enter into consent orders, assurances of voluntary compliance or other similar documents establishing an agreement with the person responsible for non-compliance. Such orders will include specific action to be taken by the person to correct the non-compliance within a specific time frame. Consent orders shall have the same force and effect as either Compliance Orders or Cease and Desist Orders.

Show Cause Hearing

The Administrator may order any violator to show cause why a proposed enforcement action should not be taken. Notice shall be served on the person(s) which specifies the time and place for the meeting, the proposed enforcement action, the reason(s) for such action, and a request that the violator show cause why this proposed enforcement action should not be taken. The notice of the meeting shall be served at least ten (10) days prior to the hearing.

Compliance Order

The Administrator may issue an order to the violator directing that, following a specific time period, adequate structures, devices, etc. be installed or procedures implemented and properly operated. Orders may also contain such other requirements as might be necessary and appropriate to address the non-compliance issue.

Cease and Desist Orders/Enforcement Escalation

The Administrator may issue an order to cease and desist all such violations and direct those persons in non-compliance to (1) comply forthwith or (2) take such appropriate remedial or preventive action as may be needed to properly addresses a continuing or threatened violation, including halting operations and terminating the discharge.

Penalties

Any persons committing any act declared unlawful under the City's stormwater ordinance or who fails to comply with any lawful communication or notice to abate or take corrective action by the City of Goodlettsville shall be guilty of a civil offense.

Under the authority provided in Tennessee Code Annotated 68-221-1106 it is declared that any person violating the provisions of this article may be assessed a civil penalty by the City of Goodlettsville of not less than fifty dollars (\$50.00) and not more than five

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thousand dollars (\$5,000.00) per day for each day of violation. Each day of violation shall constitute a separate offense.

When measuring civil penalties, the Administrator may consider (a) the harm done to the public health or environment (b) whether the civil penalty imposed will be a substantial economic deterrent to the illegal activity (c) the economic benefit gained by the violator (d) the effectiveness of action taken by the violator to cease the violation (e) any unusual or extraordinary enforcement costs incurred by the City of Goodlettsville (f) any equities of the situation which outweigh the benefit of imposing any penalty or damage assessment

In addition to the civil penalty, the City of Goodlettsville may recover (a) all damages proximately caused by the violator to the municipality, which may include any reasonable expenses incurred in investigating violations of, and enforcing compliance with, this article, or any other actual damages caused by the violation (b) the cost of the municipality's maintenance of stormwater facilities when the owner of such facilities fails to maintain them as required.

Appeals

Any person(s) aggrieved by the imposition of a civil penalty or damage assessment as provided by the above-listed enforcements, may appeal said penalty or damage assessment.

Upon issuance of a citation or notice of violation it shall be conclusive and final unless the accused violator submits a written notice of appeal to the Administrator within ten (10) days of the violation notice being served. If the Administrator does not issue a decision within ten (10) days of the written notice of the appeal, the violation is considered upheld. If the Administration does not reverse the decision, the aggrieved party may appeal to the City of Goodlettsville's Hearing Authority by filing a written request for hearing within ten (10) days of the Administrator's decision on the appeal. The request for hearing shall state the specific reasons why the decision of the Administrator is alleged to be in error.

City of Goodlettsville Hearing Authority is established under Title 18, Chapter 2, Section 18-207 of the Goodlettsville Municipal Code.

- B. As applicable, identify which of the following types of enforcement actions (or their equivalent) were used during this reporting period; indicate the number of actions, the minimum measure (e.g., construction, illicit discharge, permanent stormwater management), and note those for which you do not have authority:

<u>Action</u>	<u>Construction</u>	<u>Permanent Stormwater</u>	<u>Illicit Discharge</u>	<u>In Your ERP?</u>	
Verbal warnings	# <u>24</u>	# <u>1</u>	# <u>0</u>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Written notices	# <u>12</u>	# <u>0</u>	# <u>14</u>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Citations with administrative penalties	# <u>2</u>	# <u>0</u>	# <u>0</u>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Stop work orders	# <u>9</u>	# <u>0</u>	# <u>0</u>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Withholding of plan approvals or other authorizations	# <u>0</u>	# <u>0</u>	# <u>0</u>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Additional Measures	# <u>1</u>	# <u>0</u>	# <u>1</u>	Describe: <u>Required cleanup of paint discharge within 72 hours</u>	

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- C. Do you track instances of non-compliance and related enforcement documentation? Yes No
- D. What were the most common types of non-compliance instances documented during this reporting period?
Erosion and Sediment

10. Monitoring, Recordkeeping and reporting (Section 5)

- A. Summarize any analytical monitoring activities (e.g., planning, collection, evaluation of results) performed during this reporting period. None
- B. Summarize any non-analytical monitoring activities (e.g., planning, collection, evaluation of results) performed during this reporting period. None
- C. If applicable, are monitoring records for activities performed during this reporting period submitted with this report. Yes No

11. Certification

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

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Tim Ellis (City Manager)
 Printed Name and Title


 Signature

7/18/2018
 Date

Annual reports must be submitted by September 30 of each calendar year (Section 5.4) to the appropriate Environmental Field Office (EFO), identified in the table below:

EFO	Street Address	City	Zip Code	Telephone
Chattanooga	1301 Riverfront Pkwy, Suite 206	Chattanooga	37402	(423) 634-5745
Columbia	1421 Hampshire Pike	Columbia	38401	(931) 380-3371
Cookeville	1221 South Willow Ave.	Cookeville	38506	(931) 520-6688
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

