



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

**PROGRAM CONTACT**

Ashlie Farmer

Name

ashlie.farmer@cityofclarksville.com

Email Address

931-645-7464

Phone Number

**TECHNICAL CONTACT**

Jeff Bryant

Name

jeff.bryant@cityofclarksville.com

Email Address

931-645-7464

Phone Number

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

**PART II - DESCRIPTION OF STORM SEWER SYSTEM**

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

For a city, town, university, or utility district university or military base:

Provide jurisdiction area within current boundaries 98.95

Provide additional area of urban growth boundary 26.5

For a county:

Provide total area: \_\_\_\_\_

Provide area that is unincorporated \_\_\_\_\_

Provide unincorporated, urbanized area (UA) \_\_\_\_\_

Indicate by checking the appropriate box if the permit will be used to regulate non-UA portions of the county:

- No
- Yes, the entire county (unincorporated)
- Yes, the non-UA portions, as follows: \_\_\_\_\_

**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 267 miles (miles or feet)      Open Ditches 617 miles (miles or feet)

Culverts 23,308      Catch Basins 8,022

Water Quality Treatment Ponds ~120

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

**ITEM C - MAPS**

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 mark the applicable check box and attach an explanation as to why the information has not been submitted:

- |   |                                     |  |                                     |
|---|-------------------------------------|--|-------------------------------------|
| Areas zoned for commercial or industrial activity | <input type="checkbox"/>            | Military Installations                                 | <input type="checkbox"/>            |
| Municipally owned/operated industrial activities  | <input type="checkbox"/>            | State vocational, technical, college or universities   | <input type="checkbox"/>            |
| Municipal or County Wastewater Treatment Plants   | <input type="checkbox"/>            | Federal vocational, technical, college or universities | <input checked="" type="checkbox"/> |
| Municipal Vehicle Fleet Maintenance Centers       | <input type="checkbox"/>            | City Roads   | <input type="checkbox"/>            |
| Municipal Power Plants                            | <input checked="" type="checkbox"/> | County Roads   | <input checked="" type="checkbox"/> |
| Municipal Airports                                | <input type="checkbox"/>            | Streams  | <input type="checkbox"/>            |
| Municipal Landfills                               | <input type="checkbox"/>            | Topography or General Drainage Patterns                | <input type="checkbox"/>            |

**ITEM D - IDENTIFYING STREAMS WITH UNAVAILABLE PARAMETERS or EXCEPTIONAL TENNESSEE WATERS**

Using the GIS mapping tool (<http://www.tn.gov/environment/article/wr-water-resources-data-viewer>) along with the most current 303(d) list (<http://www.tn.gov/environment/article/wr-wq-water-quality-reports-publications>) published on the division's web site, determine whether stormwater from any part of the MS4 discharges into streams with unavailable parameters (previously referred to as impaired streams) for nutrients, pathogens, siltation, or other parameters related to stormwater runoff from urbanized areas or to streams designated as Exceptional Tennessee Waters and list below. For any waterbody with unavailable parameters or Exceptional Tennessee Waters, indicate the waterbody ID#, name of the waterbody and nature of pollution (cause) or Exceptional status.

WATERBODY ID# AND NAME OF WATERBODY	NATURE OF POLLUTANT (CAUSE) OR EXCEPTIONAL
TN05130206034-1000/ Little West Fork	Total Phosphorus, Sedimentation/Siltation, Dissolved Oxygen
TN05130206039_1000/ West Fork Red River	Other anthropogenic substrate alterations, Nitrate/Nitrite, Total Phosphorus, Sedimentation/Siltation
TN05130206039_0100/ Spring Creek	Sedimentation/Siltation, Nitrate/Nitrite, Total Phosphorus
TN05130206039_0150/ Spring Creek	Alteration in stream-side or littoral vegetative covers, Sedimentation/Siltation, Nitrate/Nitrite, Total Phosphorus
TN05130206002_1000/ Red River	Nutrient/Eutrophication Biological Indicators, Sedimentation/Siltation, Other anthropogenic substrate alterations, Escherichia coli
TN05130206002_2000/ Red River	Nitrate/Nitrite, Nitrates
TN05130206002_0700/ Seven Springs	Sedimentation/Siltation, Escherichia coli, Nitrate/Nitrite
TN05130206002_0100/ Dunbar Cave Creek	Physical substrate habitat alterations, Sedimentation/Siltation
TN05130205015T_1100/ Wall Branch	Sedimentation/Siltation, Nitrate/Nitrite

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



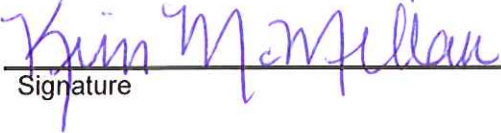
Phase II Stormwater Permit Notice of Intent (NOI)  
Phase II Municipal Separate Storm Sewer Systems (MS4)

**PART IV - SIGNATURE OF RESPONSIBLE CORPORATE OFFICER**

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

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

I certify under penalty of law that this document and all attachments were prepared by me, or under my direction or supervision. The submitted information is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury."

 _____ Signature	Mayor / City of Clarksville _____ Title/Municipality	1/24/17 _____ Date
_____ Signature	_____ Title/Municipality	_____ Date
_____ Signature	_____ Title/Municipality	_____ Date
_____ Signature	_____ Title/Municipality	_____ Date
_____ Signature	_____ Title/Municipality	_____ Date
_____ Signature	_____ Title/Municipality	_____ Date
_____ Signature	_____ Title/Municipality	_____ Date

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

**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 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. 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, instream 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:

The following list of brochures covering topics such as water quality, stormwater impacts, pollution prevention, green infrastructure, low impact development, water quality buffers, sink holes, native vegetation and Erosion Prevention Sediment Control (EPSC) practices have been distributed to homeowners, homebuilders, developers, teachers, business owners, contractors, engineers and students during the last permit cycle. This material was distributed in "teaching packets" for educators, at community events, workshops and festivals, at meetings and at presentations for local schools. Copies of these materials are also available to the public and can be found in our office displayed along the wall at the front desk.

Understanding the Water Quality Buffer

Water is Everyone's Business

After the Storm

Tennessee Homeowners Guide to Cleaner Water

Tennessee Construction Guide to Cleaner Water

Sinkholes and Water Quality in the Red River Watershed

Common Upland Hardwoods of Tennessee

Useful Native Perennial Plants for Conservation Buffers in Tennessee

The following list of booklets covering topics such as composting, green infrastructure, low impact development, rain barrels, water quality, soils, stormwater impacts, and pollution prevention, have been distributed to homeowners, teachers, homebuilders, developers, engineers, business owners, church members and students during the last permit cycle. This material was distributed in "teaching packets" for educators, at community events, workshops and festivals, at meetings and at presentations for local schools and churches. Copies of these materials are also available to the public and can be found in our office displayed along the wall at the front desk.

Discover the Waters of Tennessee

Rainwater: Your Liquid Asset A Home Stormwater Exercise

Composting Yard Garden and Food Wastes at Home

Rain Barrels Make Good Sense

The Adventures of Sammy Soil

The following list of letters covering topics such as regulatory compliance, local ordinance and regulatory updates, water quality, stormwater impacts, pollution prevention, low impact development, green infrastructure, water quality buffers, storm water legislation and EPSC practices have been distributed to homebuilders, developers, contractors, engineers, business owners, State Senators, State Representatives and municipal staff during the last permit cycle. This material was distributed in person at meetings or presentations, by email and some were posted online through Facebook and the City of Clarksville website.

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

Storm Water Management Manual Updates  
Storm Water Manufactured Treatment Devices  
EPSC Small Lot Form

Low Impact Development Requirements

Guidance Letter regarding Construction General Permit coverage

HB1892 Opposition Letter to Representative Jay Reedy

HB1892 and SB1830 Opposition Letter to Senator Mark Green, Speaker Pro Tem Curtis Johnson, Representative Joe Pitts and Representative Jay Reedy

Letter to Senator Southerland requesting the opportunity to address the Senate Energy, Agriculture and Natural Resources Committee in opposition to SB1830

The following flyer covers the topics of water quality, stormwater impacts and pollution prevention, and has been distributed to homeowners, homebuilders, business owners, teachers and students during the last permit cycle. Noticed Your Friendly Neighborhood Storm Drains Lately? Copies of this material is also available to the public and can be found in our office displayed along the wall at the front desk.

The following list of posters covering topics such as water quality, stormwater impacts, pollution prevention, water quality buffers, watersheds and EPSC practices have been distributed to homeowners, teachers, students and business owners during the last permit cycle. Copies of these materials are also available to the public and can be found in our office displayed along the wall at the front desk.

Clean Water Begins at Home

Your Hometown Clean Water Tour

A Guide to Traveling Tennessee's Watersheds.

Yes  No

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:

The following Community Workshops were offered throughout the last permit cycle:

Clarksville Montgomery County Rain Barrel Workshops have been organized and promoted by the Clarksville Street Department and Montgomery County Building and Codes. These workshops, led by the Cumberland River Compact, gave instructions on how rain barrels are made and explained how water harvesting can benefit the environment. This event has been offered to the general public in our community for the past two years (2015 and 2016). We intend for this workshop to become an annual event. In 2015, a total of 21 people signed up and attended the workshop. In 2016, a total of 20 people signed attended the workshop.

In 2015, the Clarksville Street Department held a Low Impact Development (LID) workshop to educate developers, builders and realtors on the new requirements associated with LID methods. Amec Foster Wheeler consultants led the workshop and provided each attendee with a binder containing all presentation materials. A total of 20 people attended the workshop.

The following Professional Training opportunities were offered throughout the last permit cycle:

A Level 1 Fundamentals of Erosion Prevention and Sediment Control for Construction Sites class was held for the first time in Clarksville in 2015. A group of 48 local contractors, engineers and municipal staff became certified.

A Level 1 Fundamentals of Erosion Prevention and Sediment Control for Construction Sites Re-certification class was held for the first time in Clarksville in 2016. A group of 37 local contractors, engineers and municipal staff became certified. Since we had great participation for both classes, we have arranged with UT Water Resources to offer additional classes in the future. Going forward, the Level 1 and Re-certification classes will be offered on alternating years.

The Clarksville Montgomery County School System offers an annual Science Technology Engineering and Mathematics (STEM) Externship program for teachers. This program allows teachers to spend a week with a local business to learn about their daily operations and gain insight to job related challenges, responsibilities and experiences. This experience will enable teachers to bring "real world" knowledge to the classroom and integrate it into their STEM teaching curriculum. The Clarksville Street Department has participated in this program in 2014, 2015,

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

and 2016 by hosting 2-3 teachers each year. The teachers were trained both in the office and in the field on topics such as street sign manufacturing, map designing, stream sampling, macroinvertebrate identification, surveying, traffic signal operation, construction site inspection and roadway paving.

In 2015 the City of Clarksville and Montgomery County partnered with the Clarksville Montgomery County Home Builders Association (HBA) to offer a professional training session focused on the requirements of the General NPDES Permit for Discharges of Storm Water Associated with Construction Activities (CGP). The training was led by Mr. John Chlarson, P.E. and was held during a regular HBA member meeting. In addition, several TDEC staff members attended the meeting and answered questions relating to the CGP requirements. A total of 61 engineers, developers, builders and guests attended the training session.

The following Stormwater Management Meeting was held during the last permit cycle:

In 2015, a group of 12 citizens were appointed as members of the Stormwater Advisory Committee (SWAC). The goal of the SWAC was to discuss stormwater flooding and water quality issues and ultimately develop a set of recommendations for the Mayor and City Council regarding the City's stormwater program. Through an intensive and methodical process, the SWAC performed an assessment of the existing stormwater program and made recommendations for improvements, including alternative funding sources. The SWAC overwhelmingly agreed that there is a need for stable, adequate and equitable funding for the stormwater program. Two primary funding options were discussed in detail: general funds (property taxes) and a stormwater user fee. A total of three SWAC meetings were held and a Stormwater Program Advisory Committee Summary Report was produced.

The following Professional Meetings were held throughout the last permit cycle:

A meeting to explain and discuss revisions to the Clarksville Storm Water Management Manual (SWMM) was held in 2014. A group of 40 engineers, developers, contractors, and home builders attended the meeting.

A meeting with 6 board members of the Home Builders Association to discuss and answer specific questions regarding how the SWMM revisions may affect the building community was also held in 2014.

In 2016, the City of Clarksville and Montgomery County hosted the Middle Tennessee Stormwater Group monthly meeting for July. These meetings provide an opportunity for the stormwater community to network and help each other by discussing current and ongoing issues. Guest speaker Michelle Newell, Clarksville Montgomery County Green Certification Manager, discussed the local Green Certification program. Discussion of the EPA comments regarding the new Tennessee Municipal Separate Storm Sewer System (MS4) permit and discussion of pending stormwater legislation also took place. A total of 15 people attended the meeting. Attendees included stormwater professionals from 5 surrounding counties, as well as, several environmental consultants.

In 2016, the Clarksville Street Department was contacted by the Director of Amare Montessori School. The Director inquired about public education tools and opportunities we provided to the community. We met to discuss several upcoming events and some past events, as well as, the possibility of having an onsite program at the school. The Street Department also provided the school with a large bag of water quality related educational materials.

The following Presentations were given throughout the last permit cycle:

In 2013, an Engineering 101 presentation was given to the entire 8<sup>th</sup> grade class at Richview Middle School. Topics including surveying, plans review, traffic lighting, water quality, stormwater impacts and pollution prevention were discussed.

Karst Topography and Sinkhole presentation given to the 7<sup>th</sup> grade class (approximately 250 students) and staff at Montgomery Central Middle School in 2014.

In 2014 a water quality presentation was given to 20 children in grades K-5 attending the aftercare program at Hilldale Church of Christ. Living macroinvertebrates were shown to the students and we discussed how insects and other animals, including humans, are affected by pollution caused by stormwater runoff.

In 2015 a presentation was given at a Clarksville-Montgomery County Green Certification workshop. The presentation addressed water quality issues in Clarksville and reviewed the City's MS4 permit requirements. Attendees of the workshop represented the second group to complete the Green Certification Program in 2015.



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

In 2015 the Clarksville Street Department and the Triangular Silt Dike Company worked together to set up a field demonstration of a different type of erosion and sediment control product that is not typically seen or used in Clarksville. Three local developers/builders volunteered lots for the demonstration. A total of 25 local builders, contractors and engineers attended the onsite field demonstration.

In 2016, the Clarksville Street Department gave a rain barrel presentation to the Garden Club at Minglewood Elementary. The Garden Club was a group of teachers and students in 3rd, 4th and 5th grades. A total of 17 people attended the presentation and learned how rain barrels work and the benefits to using them. The members of the Garden Club had built a garden and pond area in an outdoor common area of the school. The Clarksville Street Department donated a rain barrel to the Minglewood Elementary Garden Club to assist the students in their water conservation efforts.

The following Volunteer Opportunities were offered throughout the last permit cycle:

50K Tree Day is an annual event sponsored by the Tennessee Environmental Council and has the goal of planting as many trees as possible across the state in a single day. The Clarksville Street Department has promoted and participated in this event in 2015 and 2016. In 2015, a total of 70 volunteers, including Girl Scouts, Master Gardeners, UT Ag Extension Office and City and County employees volunteered their time and were able to plant 548 trees in three local parks (Valleybrook, Billy Dunlop and Rotary Parks). In 2016, a total of 15 volunteers, including Master Gardeners, UT Ag Extension Office, City and County employees came and were able to plant 200 trees in Valleybrook Park.

The following Community Events and Festivals were attended throughout the last permit cycle:

The Clarksville Riverfest event is held annually. The Clarksville Street Department participated in the 2014, 2015 and 2016 events. A booth was set up with informational brochures, posters and booklets on the topics of water quality, stormwater impacts, pollution prevention, green infrastructure, low impact development, water quality buffers, sink holes, native vegetation and EPSC practices. These educational materials, along with a "hands on" activity, were used as tools to educate the general public about water quality, stormwater impacts and pollution prevention. Other items like pencils, stickers, fishing bobbers, magnifying glasses, reusable grocery bags, seed packets and small notebooks were also given away during these events.

In 2015 the Clarksville Street Department set up a booth at the Clarksville Chamber of Commerce Home and Garden Show. Over the course of two days, we spoke to approximately 150 homeowners, business owners and other citizens. We talked about things people could do at home and in the community to reduce stormwater runoff and described how to make and use a rain barrel at home.

The Clarksville Rivers and Spires Festival is a 3 day event held annually. The Clarksville Street Department participated in the 2015 and 2016 events. A table was set up with informational brochures, posters and booklets on the topics of water quality, stormwater impacts, pollution prevention, green infrastructure, low impact development, water quality buffers, sink holes, native vegetation and EPSC practices. These educational materials, along with a "hands on" activity, were used as tools to educate the general public about water quality, stormwater impacts and pollution prevention. Other items like pencils, stickers, fishing bobbers, magnifying glasses, reusable grocery bags, seed packets and small notebooks were also given away during these events.

In 2016, the Street Department set up a booth and participated in the Jostens Fall + Eco Fest. This is an annual event for Jostens employees and their families. A table was set up with informational brochures, posters and booklets on the topics of water quality, stormwater impacts, pollution prevention, green infrastructure, low impact development, water quality buffers, sink holes, native vegetation and EPSC practices. Buttons, carabiners and pencils were also given away. We spoke to several hundred people throughout the day. In addition, as part of a cooperative effort, the Street Department, Bi-County and Habitat Restore collected survey information from the attendees regarding their demographics, current sustainability knowledge and the future sustainability needs of our community. We were able to collect survey responses from 59 people. These responses will be included as part of the Clarksville Montgomery County Sustainability Report.

In 2016, the Clarksville Street Department participated in the Earth Day Clarksville event. This community festival featured a variety of exhibits focused on educating the general public about things they can do to protect and preserve the Earth. A table was set up with informational brochures and booklets on the topics of water quality, stormwater impacts, pollution prevention, green infrastructure and low impact development. Reusable grocery bags and pencils were also given away.

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

Yes  No

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: The public is notified of meetings, reports, volunteer opportunities and local ordinance and regulatory revisions through local news media outlets, City of Clarksville and other event calendars, online postings to the City of Clarksville website, social media sites like Facebook and posting flyers at City and County offices.

Yes  No

**B. Proposed Activities:**

1. 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/or a structure which guides and encourages the public in participation. 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. In both cases, your proposed program should describe how you will accomplish this, along with a time schedule.

PROPOSED BEST MANAGEMENT PRACTICES FOR PUBLIC EDUCATION AND PUBLIC PARTICIPATION		
BMP	Name	DESCRIPTION
1A.	Educational campaigns	Include various educational campaigns addressing, at a minimum, those issues listed in the current MS4 permit
1B.	Educational materials	Obtain new and revise existing printed educational materials to accurately address those issues listed in the current MS4 permit
1C.	Workshops, meetings and training opportunities	Offer additional workshops, meetings and training opportunities addressing, at a minimum, those issues listed in the current MS4 permit
1D.	Website and social media outlets	Utilize the City website and social media outlets to encourage public involvement and participation in the local stormwater program as required in the MS4 permit

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

2. What specific groups will be targeted (e.g., service industries such as carpet cleaning, lawn care, civic groups, schools, church groups) if applicable: trash collection services, home owner associations, restaurants, nurseries, engineers, developers, builders, municipal employees, chemical applicators, automotive community

**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
Ashlie Farmer-Clarksville Street Department	NPDES Coordinator

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

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

OTHER DEPARTMENT(S)	ROLE
Building and Codes	Participation in water quality meetings, workshops and/or training opportunities Providing printed water quality educational materials
Gas and Water	Participation in water quality meetings, workshops and/or training opportunities Providing printed water quality educational materials
Parks and Recreation	Organization of and participation in water quality related community events

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
Montgomery County	Participation and organization of water quality workshops, meetings and/or training opportunities

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

**SECTION 2 - ILLICIT DISCHARGE DETECTION AND ELIMINATION**

**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.

1. Does the municipality currently have a storm sewer system map that shows the location of system outfalls where the municipal storm sewer system discharges into receiving waters or conveyances owned or operated by another MS4? The map must also show: the names and location of waters that receive discharges from those outfalls; 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

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

Yes  No  Page Number Title 12 Paragraph Number Section 309

3. 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 authorized or unauthorized non-stormwater discharges?

Yes  No

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

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

Yes  No

5. Does the ordinance or regulatory mechanism prohibit dumping?

Yes  No

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

Yes  No  Page Number Title 12 Paragraph Number Section 309

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

Yes  No  Maximum Penalty \$5,000/day Page Number Title 12 Paragraph Number Section 330

8. Does the municipality presently have personnel and procedures in place to detect, identify and eliminate non-stormwater discharges? If yes, describe and indicate percentage of system inspected: A portion of the outfalls are scheduled for inspection every year by Street Department personnel. Gas and Water personnel, as well as Building and Codes personnel also perform inspections relating to site compliance and complaints. If a non-stormwater discharge is identified by any of the above personnel, the discharge is documented, investigated and eliminated as required by the Stormwater Management Ordinance and Manual.

Yes  No

9. Does the municipality presently have procedures and personnel in place for enforcement of violations of the illicit discharge ordinance? If yes, describe: The Director of Streets has the authority to stop or prevent illicit discharges by denying utility services, blocking the discharge, assessing penalties and/or corrective actions.

Yes  No

10. Describe how enforcement actions are documented: Enforcement actions are documented through inspection forms, complaint forms, Notice of Violation forms, Stop Work Order forms, inspector notes and photos.

11. Has the municipality defined "hot spots" for non-stormwater discharge screening and inspection purposes? If yes, describe and provide a map of illicit discharge screening hot spots: The City of Clarksville Stormwater Management Manual defines "Hot Spot" as land uses include the following:

- (1) Restaurants;
- (2) Car maintenance facilities;
- (3) Gas stations;
- (4) Car washes;
- (5) Lawn care companies;
- (6) Commercial nurseries;
- (7) Dry cleaning companies;
- (8) New or used car sales; and
- (9) Other land uses where the potential for storm water pollution is high, as determined by the director of streets.

Yes  No

12. 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 yes, provide brief description: responsible departments, personnel, steps followed: Non-stormwater discharge complaints are received in various ways. They can be received through email, phone call, in person or through the online service request form. The complaint information is recorded by the NPDES Coordinator, Inspectors and/or administrative staff on a complaint form either electronically or written. A desktop review is performed by the NPDES Coordinator, Inspectors and/or administrative staff to

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

determine if the complaint is within the jurisdiction of the City and if other department(s) such as Gas and Water or Building and Codes should be notified. If needed, the site in question is then investigated.

Yes  No

**B. Proposed Activities:**

1. List the 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.	Enforcement Response Plan (ERP) revisions	Review and revise existing ordinance, policies and procedures relating to the ERP to reflect requirements of the current MS4 permit
2B.	Illicit Discharge Detection and Elimination (IDDE) revisions	Review and revise existing ordinance, policies and procedures relating to the IDDE program to reflect requirements of the current MS4 permit
2C.	Website updates	Utilize the City website to provide IDDE information to staff, businesses and the general public
2D.	IDDE procedures	Provide IDDE identification and reporting procedures to municipal staff

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

2. What specific groups will be targeted, if applicable? Homeowners, nurserys, restaurants, trash removal services

**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
Ashlie Farmer	NPDES Coordinator

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

OTHER DEPARTMENT(S)	ROLE
Building and Codes	IDDE assistance through investigation and reporting and/or refusing to issue or withdrawing a building permit or a Certificate of Occupancy for non-compliance
Gas and Water	IDDE assistance through investigation and reporting and/or withholding or terminating service for non-compliance

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
Montgomery County	Water quality workshops, meetings, training opportunities

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

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

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.

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: The City of Clarksville has posted MS4 Annual Reports along with other stormwater related information on the City website and on the Facebook page of the Clarksville Street Department. Public meetings have also been held to receive public input and review proposed changes to the City Stormwater Management Manual.

Yes  No

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

Yes  No  Page Number Title 12 Paragraph Number Section 304 and 308

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 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  Page Number Title 12 Paragraph Number Section 305

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

6. Do those technical standards meet or exceed the current effective Tennessee Construction General Permit (TNR100000) requirements for design storm and special conditions for waterbodies with unavailable parameters or Exceptional Tennessee Waters?

Yes  No

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

Yes  No

8. 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

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

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

Yes  No

10. Does the review process include a requirement for pre-construction meeting between the municipality and site developer, for priority construction sites?

Yes  No

11. If there is a review process, provide a brief narrative or a flow chart of the process, describing the process steps, responsible personnel, and criteria used for evaluation of information or plans that are submitted: Administrative support staff of the Street Department receives permit applications and conducts an initial completeness review within 5 working days to determine if all basic information is included. If information is missing, the application is returned with a request for additional information. Once a complete application is received, the support staff logs them into a datasheet by date received and the application is assigned a permit number. Once assigned, the permit number shall be used on all correspondence and resubmittals. Administrative support staff then notifies department technical staff (Engineers, NPDES Coordinator and Construction Manager) that an application has been received. Technical staff will then perform a technical evaluation based on criteria outlined in the City Stormwater Management Manual. If technical staff determine the application is complete and satisfactory, the application is approved and a pre-construction meeting is held with the appropriate Construction Inspector and permittee or their representative. After the preconstruction meeting has concluded, a grading permit will be issued.

12. Does the municipality presently have procedures in place for receipt and consideration of information and complaints submitted by the public? If yes, provide a brief narrative of the receipt process and procedures, describing process steps, responsible departments, personnel (by title).

Yes  No

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

Yes  No

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

Yes  No

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

Yes  No

16. Does the municipality use a Stop Work or similar order to enforce compliance with construction site policies and requirements?

Yes  No

17. How are enforcement actions documented? Enforcement actions are documented through inspection forms, Notice of Violation forms, Stop work Order forms, inspector notes and photos.

18. Have MS4 inspectors who conduct inspections of construction sites received certification under the Tennessee Fundamentals of Erosion Prevention and Sediment Control, Level 1, and construction site plan reviewers a certificate of completion from the Tennessee Erosion Prevention and Sediment Control Design Course, Level 2?

Yes  No

**B. Proposed Activities:**

1. List the 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.

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

PROPOSED BEST MANAGEMENT PRACTICES FOR CONSTRUCTION SITE RUNOFF PROGRAM		
BMP	Name	DESCRIPTION
3A.	EPSC Best Management Practices (BMP) revisions	Review and revise existing ordinance, policies and procedures relating to EPSC BMPs and ensure they are consistent with those outlined in the TDEC EPSC Handbook and CGP
3B.	Inspection and compliance revisions	Review and revise existing ordinance, policies and procedures relating to construction site inspection and compliance enforcement to ensure they are consistent with those outlined in the CGP and MS4 permits
3C.	Enforcement revisions	Review and revise existing procedures for inspectors to evaluate and document construction site compliance, including specific enforcement steps taken to ensure compliance with the City's construction program requirements
3D.	Construction waste revisions	Review and revise existing ordinance, policies and procedures for construction site operators to control waste at construction sites within the City

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

2. Describe specific groups that will be targeted, if applicable: staff, developers, homebuilders, contractors

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
Ashlie Farmer	NPDES Coordinator

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

OTHER DEPARTMENT(S)	ROLE
Building and Codes	Participation in water quality meetings and workshops Collecting EPSC Small Lot forms prior to issuing building permits Providing printed water quality educational materials

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

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

**SECTION 4 - PERMANENT STORMWATER MANAGEMENT AT NEW DEVELOPMENT AND REDEVELOPMENT**



**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 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.

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 pollutant removal controls; stormwater detention or storage; practices that infiltrate stormwater; vegetative practices.

Yes  No

If yes, 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): Chapter 3 of the attached Storm Water Management Manual lists in detail, all information required for approval of grading permits. The Storm Water Management Manual includes structural and non-structural strategies, approved BMP's and technical guidance, as well as, responsible departments and personnel.

2. 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 and paragraph number. If no, proceed to the next section on permanent stormwater management plans review.

Yes  No  Page Number Title 12 Paragraph Number Sections 303, 305 (1), 310, 320 (2)

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

Yes  No  Page Number Title 12 Paragraph Number Section 305 (1)

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

Yes  No  Page Number Title 12 Paragraph Number Section 305 (2) and (3)

5. Does the ordinance or regulatory mechanism contain or reference technical standards for water quality controls? If yes, note page number and paragraph number.

Yes  No  Page Number Title 12 Paragraph Number Sections 312 (2), 313 (3) and 314 (3)

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

Yes  No  Page Number Title 12 Paragraph Number Sections 304 (3) 313 and 319

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

Yes  No  Page Number Title 12 Paragraph Number Section 313 (1)

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

8. 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, note page number and paragraph number.

Yes  No  Page Number SWMM Paragraph Number Section 4.7.4  
Page 68

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

Yes  No  Page Number Title 12 Paragraph Number Section 330

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

Yes  No  Page Number Title 12 Paragraph Number Sections 314  
(6), 322 and 323 (3)

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

Yes  No

12. 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: The review process is outlined in section 4.7 of the attached Stormwater Management Manual.

**B. Proposed Activities:**

List the BMPs that you will implement in the area of the Permanent Stormwater Management Plans Review. These should be based on a set of priorities that you have identified in the area of the Permanent Stormwater Management Plans Review. 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 PLANS REVIEW		
BMP	Name	DESCRIPTION
4A.	Update SCM review procedures	Review and revise existing ordinance, policies and procedures relating to construction site plan approval procedures, focusing on permanent stormwater control measure review, inspection and maintenance to ensure they are consistent with the requirements of the MS4 permit.
4B.	Revise site modifications, limitations and resubmittal process	Review and revise existing ordinance, policies and procedures relating to construction site plan review and approval procedures, focusing on site modifications requiring re-submittal and site limitations to ensure they are consistent with the requirements of the MS4 permit.
4C.	Improve departmental communication	Review and make improvements to departmental communication procedures during the construction site plan review and approval procedures.
4D.	Off-site mitigation and/or public stormwater fund	Consider the development of an off-site mitigation plan and/or a public stormwater fund as an option for sites with limitations that do not allow for the full treatment of the entire WQTV as outlined in the MS4 permit.

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

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

Describe the specific groups that will be targeted, if applicable? staff, local engineers, developers, builders, contractors

**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
Jeff Bryant	Engineer

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

OTHER DEPARTMENT(S)	ROLE

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

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

<b>SECTION 5 - POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS</b>
--

**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. Each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

1. Does the municipality's current Pollution Prevention/Good Housekeeping program provide annual training for employees responsible for municipal operations at facilities within the jurisdiction of the permittee that handle, generate and/or store materials which constitute a potential pollutant of concern for MS4s? Examples of these materials may include, but are not limited to, lubricants, fuels, sand, gravel, soil, salt, pesticide, fertilizer, garbage, trash, clippings, vehicles, equipment, and other wastes.

Yes  No

2. Are training activities documented? If yes, describe training and method of record-keeping: Annual Pollution Prevention/Good Housekeeping training is provided to municipal staff. All sign-in sheets, as well as, copies of testing materials for all municipal employees are kept on file at the Street Department.

Yes  No

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

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

Yes  No  Permit Numbers(s) TNR05 TNR05 TNR0 \_\_\_\_\_  
6421 6418 56417

4. List municipal operations or facilities that have a potential for contaminating stormwater runoff such as the following: streets, roads, highways, municipal parking lots, maintenance and storage yards, fleet or maintenance shops with outdoor storage areas, salt/sand storage locations, snow disposal areas operated by the MS4, and waste disposal, storage, and transfer stations. If there is more than one facility for a given type of operation; give the number of such facilities. Indicate if an operation and maintenance plan, which includes maintenance activities, schedules and the proper disposal of waste from related structural and non-structural stormwater controls, has been implemented for each facility or operation.

FACILITY OR TYPE OF OPERATION	NUMBER OF FACILITIES	OPERATION AND MAINTENANCE PLAN IMPLEMENTED?
Garage	1	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
CTS	1	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Sewer Treatment Plant	1	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Street Department	1	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Salt Sheds	2	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Golf Courses	2	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
		Yes <input type="checkbox"/> No <input type="checkbox"/>
		Yes <input type="checkbox"/> No <input type="checkbox"/>
		Yes <input type="checkbox"/> No <input type="checkbox"/>
		Yes <input type="checkbox"/> No <input type="checkbox"/>
		Yes <input type="checkbox"/> No <input type="checkbox"/>
		Yes <input type="checkbox"/> No <input type="checkbox"/>
		Yes <input type="checkbox"/> No <input type="checkbox"/>
		Yes <input type="checkbox"/> No <input type="checkbox"/>

**B. Proposed Activities:**

List the BMPs that you will implement in the area of the Pollution Prevention and Good Housekeeping Program. These should be based on a set of priorities that you have identified in the area of the Pollution Prevention and Good 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.

PROPOSED BEST MANAGEMENT PRACTICES FOR POLLUTION PREVENTION AND HOUSEKEEPING		
BMP	Name	DESCRIPTION
5A.	Training program revisions	Revise existing pollution prevention/good housekeeping training program in order to provide training to new employees within six months of their employment or movement into an applicable job category as required in the MS4 permit.
5B.	O&M plan review	Review existing O&M plans for municipal operations and revise and/or develop new plans as required in the MS4 permit.
5C.	Municipal operation review	Assist City departments by reviewing municipal operations to ensure appropriate pollution prevention practices are being employed.
5D.	Educational materials	Review existing and if necessary, obtain new pollution prevention/good housekeeping printed educational materials and provide this material to all City departments.

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

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

Provide specific groups that will be targeted, if applicable: 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
Ashlie Farmer	NPDES Coordinator

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

OTHER DEPARTMENT(S)	ROLE
Golf Courses	Continue turf management program to limit the use of fertilizers
Human Resources	Include printed pollution prevention/good housekeeping materials in employment package for new or transferred employees

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
Montgomery County	Participation in water quality workshops, meetings, training opportunities

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

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

**ADDENDUM TO SMALL MS4 NPDES PERMIT NOI - 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, 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.

<b>BEST MANAGEMENT PRACTICES FOR PUBLIC EDUCATION AND PUBLIC PARTICIPATION</b>	
<b>BMP 1A</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Include various educational campaigns addressing, at a minimum, those issues listed in the current MS4 permit.
Milestone Year 1	Provide letters and/or flyers to the general public, municipal employees and professional community targeting those issues listed in the current MS4 permit. The effectiveness of this goal will be monitored by tracking number of letters/flyers sent or handed out and number of people reached.
Milestone Year 2	Continue to provide letters and/or flyers to the general public, municipal employees and professional community targeting those issues listed in the current MS4 permit. The effectiveness of this goal will be monitored by tracking number of letters/flyers sent or handed out and number of people reached.
Milestone Year 3	Continue to provide letters and/or flyers to the general public, municipal employees and professional community targeting those issues listed in the current MS4 permit. The effectiveness of this goal will be monitored by tracking number of letters/flyers sent or handed out and number of people reached.
Milestone Year 4	Continue to provide letters and/or flyers to the general public, municipal employees and professional community targeting those issues listed in the current MS4 permit. The effectiveness of this goal will be monitored by tracking number of letters/flyers sent or handed out and number of people reached.
Milestone Year 5	Continue to provide letters and/or flyers to the general public, municipal employees and professional community targeting those issues listed in the current MS4 permit. The effectiveness of this goal will be monitored by tracking number of letters/flyers sent or handed out and number of people reached.
<b>BMP 1B</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Obtain new and revise existing printed educational materials to accurately address those issues listed in the current MS4 permit.
Milestone Year 1	Maintain a selection of printed educational materials that cover, at a minimum, those issues listed in the current MS4 permit. Make revisions to existing printed materials as necessary. The effectiveness of this goal will be monitored by tracking number of materials used throughout the year.
Milestone Year 2	Maintain a selection of printed educational materials that cover, at a minimum, those issues listed in the current MS4 permit. Make revisions to existing printed materials as necessary. The effectiveness of this goal will be monitored by tracking number of materials used throughout the year.
Milestone Year 3	Maintain a selection of printed educational materials that cover, at a minimum, those issues listed in the current MS4 permit. Make revisions to existing printed materials as necessary. The effectiveness of this goal will be monitored by tracking number of materials used throughout the year.
Milestone Year 4	Maintain a selection of printed educational materials that cover, at a minimum, those issues listed in the current MS4 permit. Make revisions to existing printed materials as necessary. The effectiveness of this goal will be monitored by tracking number of

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

	materials used throughout the year.
Milestone Year 5	Maintain a selection of printed educational materials that cover, at a minimum, those issues listed in the current MS4 permit. Make revisions to existing printed materials as necessary. The effectiveness of this goal will be monitored by tracking number of materials used throughout the year.

<b>BMP 1C</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Offer additional workshops, meetings and training opportunities addressing, at a minimum, those issues listed in the current MS4 permit.
Milestone Year 1	Provide a minimum of one workshop, meeting and/or training opportunity to the general public, municipal employees and professional community targeting, at a minimum, those issues listed in the current MS4 permit. The effectiveness of this goal will be monitored by tracking number of attendees and/or utilizing surveys and/or taking photographs of activities.
Milestone Year 2	Provide a minimum of one workshop, meeting and/or training opportunity to the general public, municipal employees and professional community targeting, at a minimum, those issues listed in the current MS4 permit. The effectiveness of this goal will be monitored by tracking number of attendees and/or utilizing surveys and/or taking photographs of activities.
Milestone Year 3	Provide a minimum of one workshop, meeting and/or training opportunity to the general public, municipal employees and professional community targeting, at a minimum, those issues listed in the current MS4 permit. The effectiveness of this goal will be monitored by tracking number of attendees and/or utilizing surveys and/or taking photographs of activities.
Milestone Year 4	Provide a minimum of one workshop, meeting and/or training opportunity to the general public, municipal employees and professional community targeting, at a minimum, those issues listed in the current MS4 permit. The effectiveness of this goal will be monitored by tracking number of attendees and/or utilizing surveys and/or taking photographs of activities.
Milestone Year 5	Provide a minimum of one workshop, meeting and/or training opportunity to the general public, municipal employees and professional community targeting, at a minimum, those issues listed in the current MS4 permit. The effectiveness of this goal will be monitored by tracking number of attendees and/or utilizing surveys and/or taking photographs of activities.

<b>BMP 1D</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Utilize the City website and social media outlets to encourage public involvement and participation in the local stormwater program as required in the MS4 permit.
Milestone Year 1	Continue to update and utilize the City website and social media outlets to encourage public participation by posting information about MS4 related meetings, volunteer opportunities, community events and illicit discharge detection. The effectiveness of this goal can be monitored by utilizing surveys and/or using a hit counter to track the number of times a website has been visited.
Milestone Year 2	Continue to update and utilize the City website and social media outlets to encourage public participation by posting information about MS4 related meetings, volunteer opportunities, community events and illicit discharge detection. The effectiveness of this goal can be monitored by utilizing surveys and/or using a hit counter to track the number of times a website has been visited.
Milestone Year 3	Continue to update and utilize the City website and social media outlets to encourage public participation by posting information about MS4 related meetings, volunteer opportunities, community events and illicit discharge detection. The effectiveness of this goal can be monitored by utilizing surveys and/or using a hit counter to track the number of times a website has been visited.
Milestone Year 4	Continue to update and utilize the City website and social media outlets to encourage public participation by posting information about MS4 related meetings, volunteer opportunities, community events and illicit discharge detection. The effectiveness of this goal can be monitored by utilizing surveys and/or using a hit counter to track the number of times a website has been visited.
Milestone Year 5	Continue to update and utilize the City website and social media outlets to encourage

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

	public participation by posting information about MS4 related meetings, volunteer opportunities, community events and illicit discharge detection. The effectiveness of this goal can be monitored by utilizing surveys and/or using a hit counter to track the number of times a website has been visited.
--	---

<b>BEST MANAGEMENT PRACTICES FOR ILLICIT DISCHARGE DETECTION AND ELIMINATION</b>	
--	--

<b>BMP 2A</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Review and revise existing ordinance, policies and procedures relating to the ERP to reflect the requirements of the current MS4 permit.
Milestone Year 1	Continue to review and revise existing ordinance, policies and procedures relating to the ERP to reflect the requirements of the current MS4 permit. The effectiveness of this goal can be monitored by tracking the number of illicit discharges reported and the number eliminated.
Milestone Year 2	Continue to review and revise existing ordinance, policies and procedures relating to the ERP to reflect the requirements of the current MS4 permit. The effectiveness of this goal can be monitored by tracking the number of illicit discharges reported and the number eliminated.
Milestone Year 3	Continue to review and revise existing policies and procedures relating to the ERP to reflect the requirements of the current MS4 permit. The effectiveness of this goal can be monitored by tracking the number of illicit discharges reported and the number eliminated.
Milestone Year 4	Continue to review and revise existing policies and procedures relating to the ERP to reflect the requirements of the current MS4 permit. The effectiveness of this goal can be monitored by tracking the number of illicit discharges reported and the number eliminated.
Milestone Year 5	Continue to review and revise existing policies and procedures relating to the ERP to reflect the requirements of the current MS4 permit. The effectiveness of this goal can be monitored by tracking the number of illicit discharges reported and the number eliminated.

<b>BMP 2B</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Review and revise existing ordinance, policies and procedures relating to the IDDE program to reflect the requirements of the current MS4 permit.
Milestone Year 1	Continue to review and revise existing ordinance, policies and procedures relating to the IDDE program to reflect the requirements of the current MS4 permit. The effectiveness of this goal can be monitored by tracking the number of illicit discharges reported and the number eliminated.
Milestone Year 2	Continue to review and revise existing ordinance, policies and procedures relating to the IDDE program to reflect the requirements of the current MS4 permit. The effectiveness of this goal can be monitored by tracking the number of illicit discharges reported and the number eliminated.
Milestone Year 3	Continue to review and revise existing policies and procedures relating to the IDDE program to reflect the requirements of the current MS4 permit. The effectiveness of this goal can be monitored by tracking the number of illicit discharges reported and the number eliminated.
Milestone Year 4	Continue to review and revise existing policies and procedures relating to the IDDE program to reflect the requirements of the current MS4 permit. The effectiveness of this goal can be monitored by tracking the number of illicit discharges reported and the number eliminated.
Milestone Year 5	Continue to review and revise existing policies and procedures relating to the IDDE program to reflect the requirements of the current MS4 permit. The effectiveness of this goal can be monitored by tracking the number of illicit discharges reported and the number eliminated.

<b>BMP 2C</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Utilize the City website to provide IDDE information to staff, businesses and the general public.
Milestone Year 1	Provide public access to website links and/or documents relating to the IDDE program



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

	on the City website. The effectiveness of this goal can be monitored by utilizing surveys and/or using a hit counter to track the number of times a website has been visited.
Milestone Year 2	Provide public access to website links and/or documents relating to the IDDE program on the City website. The effectiveness of this goal can be monitored by utilizing surveys and/or using a hit counter to track the number of times a website has been visited.
Milestone Year 3	Provide public access to website links and/or documents relating to the IDDE program on the City website. The effectiveness of this goal can be monitored by utilizing surveys and/or using a hit counter to track the number of times a website has been visited.
Milestone Year 4	Provide public access to website links and/or documents relating to the IDDE program on the City website. The effectiveness of this goal can be monitored by utilizing surveys and/or using a hit counter to track the number of times a website has been visited.
Milestone Year 5	Provide public access to website links and/or documents relating to the IDDE program on the City website. The effectiveness of this goal can be monitored by utilizing surveys and/or using a hit counter to track the number of times a website has been visited.
<b>BMP 2D</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Provide IDDE identification and reporting procedures to municipal staff.
Milestone Year 1	Continue to provide IDDE identification and reporting procedures to municipal staff. The effectiveness of this goal can be monitored by tracking the number of illicit discharges reported and the number eliminated.
Milestone Year 2	Continue to provide IDDE identification and reporting procedures to municipal staff. The effectiveness of this goal can be monitored by tracking the number of illicit discharges reported and the number eliminated.
Milestone Year 3	Continue to provide IDDE identification and reporting procedures to municipal staff. The effectiveness of this goal can be monitored by tracking the number of illicit discharges reported and the number eliminated.
Milestone Year 4	Continue to provide IDDE identification and reporting procedures to municipal staff. The effectiveness of this goal can be monitored by tracking the number of illicit discharges reported and the number eliminated.
Milestone Year 5	Continue to provide IDDE identification and reporting procedures to municipal staff. The effectiveness of this goal can be monitored by tracking the number of illicit discharges reported and the number eliminated.

<b>BEST MANAGEMENT PRACTICES FOR CONSTRUCTION SITE RUNOFF PROGRAM</b>	
<b>BMP 3A</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Review and revise existing ordinance, policies and procedures relating to EPSC BMPs and ensure they are consistent with those outlined in the TDEC EPSC Handbook and CGP.
Milestone Year 1	Continue to review and revise existing policies and procedures relating to EPSC BMPs and ensure they are consistent with those outlined in the TDEC EPSC Handbook and CGP. The effectiveness of this goal can be monitored by tracking the number of EPSC related complaints received.
Milestone Year 2	Continue to review and revise existing policies and procedures relating to EPSC BMPs and ensure they are consistent with those outlined in the TDEC EPSC Handbook and CGP. The effectiveness of this goal can be monitored by tracking the number of EPSC related complaints received.
Milestone Year 3	Continue to review and revise existing policies and procedures relating to EPSC BMPs and ensure they are consistent with those outlined in the TDEC EPSC Handbook and CGP. The effectiveness of this goal can be monitored by tracking the number of EPSC related complaints received.
Milestone Year 4	Continue to review and revise existing policies and procedures relating to EPSC BMPs and ensure they are consistent with those outlined in the TDEC EPSC Handbook and CGP. The effectiveness of this goal can be monitored by tracking the number of EPSC related complaints received.
Milestone Year 5	Continue to review and revise existing policies and procedures relating to EPSC BMPs and ensure they are consistent with those outlined in the TDEC EPSC Handbook and CGP. The effectiveness of this goal can be monitored by tracking the number of EPSC related complaints received.

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

BMP 3B	MEASURABLE GOALS AND MILESTONES
Goal(s)	Review and revise existing ordinance, policies and procedures relating to construction site inspection and compliance enforcement to ensure they are consistent with those outlined in the current CGP and MS4 permits.
Milestone Year 1	Continue to revise existing ordinance, policies and procedures relating to construction site inspection and compliance enforcement to ensure they are consistent with those outlined in the current CGP and MS4 permits. The effectiveness of this goal can be monitored by tracking the number of construction stormwater related complaints we received and the number of enforcement actions taken by staff.
Milestone Year 2	Continue to revise existing ordinance, policies and procedures relating to construction site inspection and compliance enforcement to ensure they are consistent with those outlined in the current CGP and MS4 permits. The effectiveness of this goal can be monitored by tracking the number of construction stormwater related complaints we received and the number of enforcement actions taken by staff.
Milestone Year 3	Continue to revise existing policies and procedures relating to construction site inspection and compliance enforcement to ensure they are consistent with those outlined in the current CGP and MS4 permits. The effectiveness of this goal can be monitored by tracking the number of construction stormwater related complaints we received and the number of enforcement actions taken by staff.
Milestone Year 4	Continue to revise existing policies and procedures relating to construction site inspection and compliance enforcement to ensure they are consistent with those outlined in the current CGP and MS4 permits. The effectiveness of this goal can be monitored by tracking the number of construction stormwater related complaints we received and the number of enforcement actions taken by staff.
Milestone Year 5	Continue to revise existing policies and procedures relating to construction site inspection and compliance enforcement to ensure they are consistent with those outlined in the current CGP and MS4 permits. . The effectiveness of this goal can be monitored by tracking the number of construction stormwater related complaints we received and the number of enforcement actions taken by staff.

BMP 3C	MEASURABLE GOALS AND MILESTONES
Goal(s)	Review and revise existing procedures for inspectors to evaluate and document construction site compliance, including specific enforcement steps taken to ensure compliance with the City's construction program requirements.
Milestone Year 1	Continue to review and revise existing procedures for inspectors to evaluate and document construction site compliance, including specific enforcement steps taken to ensure compliance with the City's construction program requirements. The effectiveness of this goal can be monitored by tracking the number of construction stormwater related complaints received and the number of enforcement actions taken by staff.
Milestone Year 2	Continue to review and revise existing procedures for inspectors to evaluate and document construction site compliance, including specific enforcement steps taken to ensure compliance with the City's construction program requirements. The effectiveness of this goal can be monitored by tracking the number of construction stormwater related complaints received and the number of enforcement actions taken by staff.
Milestone Year 3	Continue to review and revise existing procedures for inspectors to evaluate and document construction site compliance, including specific enforcement steps taken to ensure compliance with the City's construction program requirements. The effectiveness of this goal can be monitored by tracking the number of construction stormwater related complaints received and the number of enforcement actions taken by staff.
Milestone Year 4	Continue to review and revise existing procedures for inspectors to evaluate and document construction site compliance, including specific enforcement steps taken to ensure compliance with the City's construction program requirements. The effectiveness of this goal can be monitored by tracking the number of construction stormwater related complaints received and the number of enforcement actions taken by staff.

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

Milestone Year 5	Continue to review and revise existing procedures for inspectors to evaluate and document construction site compliance, including specific enforcement steps taken to ensure compliance with the City's construction program requirements. The effectiveness of this goal can be monitored by tracking the number of construction stormwater related complaints we received and the number of enforcement actions taken by staff.
<b>BMP 3D</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Review and revise existing ordinance, policies and procedures for construction site operators to control waste at construction sites within the City.
Milestone Year 1	Continue to review and revise existing ordinance, policies and procedures for construction site operators to control waste at construction sites within the City. The effectiveness of this goal can be monitored by tracking the number of construction waste related complaints received.
Milestone Year 2	Continue to review and revise existing ordinance, policies and procedures for construction site operators to control waste at construction sites within the City. The effectiveness of this goal can be monitored by tracking the number of construction waste related complaints received.
Milestone Year 3	Continue to review and revise existing ordinance, policies and procedures for construction site operators to control waste at construction sites within the City. The effectiveness of this goal can be monitored by tracking the number of construction waste related complaints received.
Milestone Year 4	Continue to review and revise existing ordinance, policies and procedures for construction site operators to control waste at construction sites within the City. The effectiveness of this goal can be monitored by tracking the number of construction waste related complaints received.
Milestone Year 5	Continue to review and revise existing ordinance, policies and procedures for construction site operators to control waste at construction sites within the City. The effectiveness of this goal can be monitored by tracking the number of construction waste related complaints received.

<b>BEST MANAGEMENT PRACTICES FOR PERMANENT (POST-CONSTRUCTION) STORMWATER MANAGEMENT PROGRAM</b>	
<b>BMP 4A</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Review and revise existing ordinance, policies and procedures relating to construction site plan approval procedures, focusing on permanent stormwater control measure review, inspection and maintenance to ensure they are consistent with the requirements of the MS4 permit.
Milestone Year 1	Continue to review and revise existing ordinance, policies and procedures relating to construction site plan approval procedures, focusing on permanent stormwater control measure review, inspection and maintenance to ensure they are consistent with the requirements of the MS4 permit. The effectiveness of this goal can be monitored by tracking the number complaints received that are related to permanent stormwater control measures.
Milestone Year 2	Continue to review and revise existing ordinance, policies and procedures relating to construction site plan approval procedures, focusing on permanent stormwater control measure review, inspection and maintenance to ensure they are consistent with the requirements of the MS4 permit. The effectiveness of this goal can be monitored by tracking the number complaints received that are related to permanent stormwater control measures.
Milestone Year 3	Continue to review and revise existing ordinance, policies and procedures relating to construction site plan approval procedures, focusing on permanent stormwater control measure review, inspection and maintenance to ensure they are consistent with the requirements of the MS4 permit. The effectiveness of this goal can be monitored by tracking the number complaints received that are related to permanent stormwater control measures.
Milestone Year 4	Continue to review and revise existing ordinance, policies and procedures relating to construction site plan approval procedures, focusing on permanent stormwater control measure review, inspection and maintenance to ensure they are consistent with the

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

	requirements of the MS4 permit. The effectiveness of this goal can be monitored by tracking the number complaints received that are related to permanent stormwater control measures.
Milestone Year 5	Continue to review and revise existing ordinance, policies and procedures relating to construction site plan approval procedures, focusing on permanent stormwater control measure review, inspection and maintenance to ensure they are consistent with the requirements of the MS4 permit. The effectiveness of this goal can be monitored by tracking the number complaints received that are related to permanent stormwater control measures.
<b>BMP 4B</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Review and revise existing ordinance, policies and procedures relating to construction site plan review and approval procedures, focusing on site modifications requiring re-submittal and site limitations to ensure they are consistent with the requirements of the MS4 permit.
Milestone Year 1	Continue to review and revise existing ordinance, policies and procedures relating to construction site plan review and approval procedures, focusing on site modifications requiring re-submittal, site limitations and installation verification to ensure they are consistent with the requirements of the MS4 permit. The effectiveness of this goal can be monitored by tracking the number complaints received that are related to permanent stormwater control measures.
Milestone Year 2	Continue to review and revise existing ordinance, policies and procedures relating to construction site plan review and approval procedures, focusing on site modifications requiring re-submittal, site limitations and installation verification to ensure they are consistent with the requirements of the MS4 permit. The effectiveness of this goal can be monitored by tracking the number complaints received that are related to permanent stormwater control measures.
Milestone Year 3	Continue to review and revise existing policies and procedures relating to construction site plan review and approval procedures, focusing on site modifications requiring re-submittal, site limitations and installation verification to ensure they are consistent with the requirements of the MS4 permit. The effectiveness of this goal can be monitored by tracking the number complaints received that are related to permanent stormwater control measures.
Milestone Year 4	Continue to review and revise existing policies and procedures relating to construction site plan review and approval procedures, focusing on site modifications requiring re-submittal, site limitations and installation verification to ensure they are consistent with the requirements of the MS4 permit. The effectiveness of this goal can be monitored by tracking the number complaints received that are related to permanent stormwater control measures.
Milestone Year 5	Continue to review and revise existing policies and procedures relating to construction site plan review and approval procedures, focusing on site modifications requiring re-submittal, site limitations and installation verification to ensure they are consistent with the requirements of the MS4 permit. The effectiveness of this goal can be monitored by tracking the number complaints received that are related to permanent stormwater control measures.

<b>BMP 4C</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Review and make improvements to departmental communication procedures during the construction site plan review and approval procedures.
Milestone Year 1	Continue to make improvements to departmental communication procedures during the construction site plan review and approval procedures. The effectiveness of this goal can be monitored by tracking the number complaints received that are related to site plan review and approval procedures.
Milestone Year 2	Continue to make improvements to departmental communication procedures during the construction site plan review and approval procedures. The effectiveness of this goal can be monitored by tracking the number complaints received that are related to site plan review and approval procedures.
Milestone Year 3	Continue to make improvements to departmental communication procedures during the construction site plan review and approval procedures. The effectiveness of this goal

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

	can be monitored by tracking the number complaints received that are related to site plan review and approval procedures.
Milestone Year 4	Continue to make improvements to departmental communication procedures during the construction site plan review and approval procedures. The effectiveness of this goal can be monitored by tracking the number complaints received that are related to site plan review and approval procedures.
Milestone Year 5	Continue to make improvements to departmental communication procedures during the construction site plan review and approval procedures. The effectiveness of this goal can be monitored by tracking the number complaints received that are related to site plan review and approval procedures.
<b>BMP 4D</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Consider the development of an off-site mitigation plan and/or a public stormwater fund as an option for sites with limitations that do not allow for the full treatment of the entire WQTV as outlined in the MS4 permit.
Milestone Year 1	Continue to discuss and consider the development of an off-site mitigation plan and/or a public stormwater fund as an option for sites with limitations that do not allow for the full treatment of the entire WQTV as outlined in the MS4 permit. The effectiveness of this goal can be monitored by tracking the meetings held to discuss this topic and any steps taken to further the development.
Milestone Year 2	Continue to discuss and consider the development of an off-site mitigation plan and/or a public stormwater fund as an option for sites with limitations that do not allow for the full treatment of the entire WQTV as outlined in the MS4 permit. The effectiveness of this goal can be monitored by tracking the meetings held to discuss this topic and any steps taken to further the development.
Milestone Year 3	Continue to discuss and consider the development of an off-site mitigation plan and/or a public stormwater fund as an option for sites with limitations that do not allow for the full treatment of the entire WQTV as outlined in the MS4 permit. The effectiveness of this goal can be monitored by tracking the meetings held to discuss this topic and any steps taken to further the development.
Milestone Year 4	Continue to discuss and consider the development of an off-site mitigation plan and/or a public stormwater fund as an option for sites with limitations that do not allow for the full treatment of the entire WQTV as outlined in the MS4 permit. The effectiveness of this goal can be monitored by tracking the meetings held to discuss this topic and any steps taken to further the development.
Milestone Year 5	Continue to discuss and consider the development of an off-site mitigation plan and/or a public stormwater fund as an option for sites with limitations that do not allow for the full treatment of the entire WQTV as outlined in the MS4 permit. The effectiveness of this goal can be monitored by tracking the meetings held to discuss this topic and any steps taken to further the development.

<b>BEST MANAGEMENT PRACTICES FOR MUNICIPAL POLLUTION PREVENTION AND GOOD HOUSEKEEPING</b>	
<b>BMP 5A</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Revise existing pollution prevention/good housekeeping training program in order to provide training to new employees within six months of their employment or movement into an applicable job category as required in the MS4 permit.
Milestone Year 1	Continue to provide pollution prevention/good housekeeping training program in order to provide training to new employees within six months of their employment or movement into an applicable job category as required in the MS4 permit. The effectiveness of this goal will be monitored by tracking the number of employees that attend the training classes.
Milestone Year 2	Continue to provide pollution prevention/good housekeeping training program in order to provide training to new employees within six months of their employment or movement into an applicable job category as required in the MS4 permit. The effectiveness of this goal will be monitored by tracking the number of employees that attend the training classes.
Milestone Year 3	Continue to provide pollution prevention/good housekeeping training program in order to provide training to new employees within six months of their employment or

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

	movement into an applicable job category as required in the MS4 permit. The effectiveness of this goal will be monitored by tracking the number of employees that attend the training classes.
Milestone Year 4	Continue to provide pollution prevention/good housekeeping training program in order to provide training to new employees within six months of their employment or movement into an applicable job category as required in the MS4 permit. The effectiveness of this goal will be monitored by tracking the number of employees that attend the training classes.
Milestone Year 5	Continue to provide pollution prevention/good housekeeping training program in order to provide training to new employees within six months of their employment or movement into an applicable job category as required in the MS4 permit. The effectiveness of this goal will be monitored by tracking the number of employees that attend the training classes.

<b>BMP 5B</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Review existing O&M plans for municipal operations and revise and/or develop new plans as required in the MS4 permit.
Milestone Year 1	Continue to review, revise and/or develop O&M plans for municipal operations as required in the MS4 permit. The effectiveness of this goal will be monitored by tracking required documentation.
Milestone Year 2	Continue to review, revise and/or develop O&M plans for municipal operations as required in the MS4 permit. The effectiveness of this goal will be monitored by tracking required documentation.
Milestone Year 3	Continue to review, revise and/or develop O&M plans for municipal operations as required in the MS4 permit. The effectiveness of this goal will be monitored by tracking required documentation.
Milestone Year 4	Continue to review, revise and/or develop O&M plans for municipal operations as required in the MS4 permit. The effectiveness of this goal will be monitored by tracking required documentation.
Milestone Year 5	Continue to review, revise and/or develop O&M plans for municipal operations as required in the MS4 permit. The effectiveness of this goal will be monitored by tracking required documentation.

<b>BMP 5C</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Assist City departments by reviewing municipal operations to ensure appropriate pollution prevention practices are being employed.
Milestone Year 1	Continue to assist City departments by reviewing municipal operations to ensure appropriate pollution prevention practices are being employed. The effectiveness of this goal can be monitored by documenting any assistance provided and revisions made.
Milestone Year 2	Continue to assist City departments by reviewing municipal operations to ensure appropriate pollution prevention practices are being employed. The effectiveness of this goal can be monitored by documenting any assistance provided and revisions made.
Milestone Year 3	Continue to assist City departments by reviewing municipal operations to ensure appropriate pollution prevention practices are being employed. The effectiveness of this goal can be monitored by documenting any assistance provided and revisions made.
Milestone Year 4	Continue to assist City departments by reviewing municipal operations to ensure appropriate pollution prevention practices are being employed. The effectiveness of this goal can be monitored by documenting any assistance provided and revisions made.
Milestone Year 5	Continue to assist City departments by reviewing municipal operations to ensure appropriate pollution prevention practices are being employed. The effectiveness of this goal can be monitored by documenting any assistance provided and revisions made.

<b>BMP 5D</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Review existing and if necessary, obtain new pollution prevention/good housekeeping printed educational materials and provide this material to all City departments.
Milestone Year 1	Continue to review existing and if necessary, obtain new pollution prevention/good housekeeping printed educational materials and provide this material to all City departments as needed. The effectiveness of this goal can be monitored by tracking

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

	the amount of materials obtained and provided to City departments.
Milestone Year 2	Continue to review existing and if necessary, obtain new pollution prevention/good housekeeping printed educational materials and provide this material to all City departments as needed. The effectiveness of this goal can be monitored by tracking the amount of materials obtained and provided to City departments.
Milestone Year 3	Continue to review existing and if necessary, obtain new pollution prevention/good housekeeping printed educational materials and provide this material to all City departments as needed. The effectiveness of this goal can be monitored by tracking the amount of materials obtained and provided to City departments.
Milestone Year 4	Continue to review existing and if necessary, obtain new pollution prevention/good housekeeping printed educational materials and provide this material to all City departments as needed. The effectiveness of this goal can be monitored by tracking the amount of materials obtained and provided to City departments.
Milestone Year 5	Continue to review existing and if necessary, obtain new pollution prevention/good housekeeping printed educational materials and provide this material to all City departments as needed. The effectiveness of this goal can be monitored by tracking the amount of materials obtained and provided to City departments.