



## **NOTICE OF PUBLIC HEARING**

The City of Millersville Board of Commissioners will conduct a Public Hearing on Tuesday, September 17, 2019 at 5:30 P.M. in the Commission Chambers at City Hall, 1246 Louisville Highway, Millersville, TN to consider the following:

1. Acceptance of the Phase II Small Municipal Separate Storm Sewer System (MS4) Annual Report for 2018-2019 (DRAFT of Report follows)

All interested parties are invited to attend this meeting and make their views known.



Tennessee Department of Environment and Conservation  
 Division of Water Resources  
 William R. Snodgrass Tennessee Tower,  
 312 Rosa L. Parks Avenue, 11th Floor, Nashville, Tennessee 37243  
 1-888-891-8332 (TDEC)

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

1. MS4 Information

Name of MS4: City of Millersville		MS4 Permit Number: TNS 077887
Contact Person: Michael Barr		Email Address: development@cityofmillersville.com
Telephone: (615) 859-0880		MS4 Program Web Address: https://www.cityofmillersville.com/department/index.php?structureid=23
Mailing Address: 1246 Louisville Hwy		
City: Millersville	State: TN	ZIP code: 37072

What is the current population of your MS4? 6781 (2018 estimate)

What is the reporting period for this annual report? July1 2018 to June 30 2019

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

- A. Does your MS4 discharge into waters with unavailable parameters (previously referred to as impaired) for pathogens, nutrients, siltation or other parameters related to stormwater runoff from urbanized areas as listed on TN's most current 303(d) list and/or according to the on-line state GIS mapping tool ([tdeconline.tn.gov/dwr/](http://tdeconline.tn.gov/dwr/))? If yes, attach a list.  Yes  No
- B. Are there established and approved TMDLs (<http://www.tn.gov/environment/article/wr-ws-tennessees-total-maximum-daily-load-tmdl-program>) with waste load allocations for MS4 discharges in your jurisdiction? If yes, attach a list.  Yes  No
- C. Does your MS4 discharge to any Exceptional Tennessee Waters (ETWs - [http://environment-online.tn.gov:8080/pls/enf\\_reports/f?p=9034:34304:4880790061142](http://environment-online.tn.gov:8080/pls/enf_reports/f?p=9034:34304:4880790061142))? If yes, attach a list.  Yes  No
- D. Are you implementing specific Best Management Practices (BMPs) to control pollutant discharges to waterbodies with unavailable parameters or ETWs? If yes, describe the specific practices: Per City Ordinance 19-104, Millersville requires Land Disturbance Permit for any activity that disturbs more than one acre of land, or less than one acre of land if such activity is part of a larger common plan of development that affects one or more acre of land and involves grubbing, clearing, grading or excavation; Land disturbing activity of less than one acre of land, if in the discretion of the stormwater manager such activity poses a unique threat to water, or public health or safety; and for creation/use of borrow pits, fill areas or stock piles. The purpose of this permit is to allow the City to track these types of activities, verify adherence to approved plans, and to ensure that permittees are implementing appropriate erosion prevention and sediment control practices as part of their work. The City also has enacted a Buffer zone policy that prohibits disturbance adjacent to protected waterways. This policy is planned to be amended in the 2019-20 permit cycle to comply with the minimum buffer widths as specified in the current State NPDES permit for Small MS4s.  Yes  No

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

- A. Have you developed a Public Information and Education plan (PIE)?  Yes  No
- B. Is your public education program targeting specific pollutants and sources, such as Hot Spots? If yes, describe the specific pollutants and/or sources targeted by your public education program: The current PIE plan lists the following groups as specific targets: citizens for general housekeeping activities, Owners of permanent BMPs, Developers and their design consultants, Contractors, professional lawn and landscape companies, professionals working with petroleum based products or other chemicals, municipal employees. The City plans to update the current PIE plan in the 19-20 reporting period to identify specific outreach and education events and implement a schedule.  Yes  No
- C. Do you have a webpage dedicated to your stormwater program? If yes, provide a link/URL: https://www.cityofmillersville.com/departement/index.php?structureid=23  Yes  No  
The website needs to include more educational information, and provide details ragrding the City's MS4 program activities
- D. Summarize how you advertise and publicize your public education, outreach, involvement and participation opportunities: Stormwater information has been posted on the website, at City Hall, the Library and the Community Center. Brochures are available for pick up as well. The City would like to create a Millersville Stormwater Facebook page to easier distribute informaiton.
- E. Summarize the public education, outreach, involvement and participation activities you completed during this reporting period: Attendance at Middle Tennessee Stromwater Group Meetings, participation in the 250k tree day, participated in a Community Stream clean up in association with Goodlettsville, Our consultant engineer has also regularly communicated with developer's engineers to inform them about the City's requirements for stormwater management on construction projects.
- F. Summarize any specific successful outcome(s) (e.g., citizen involvement, pollutant reduction, water quality improvement, etc.) fully or partially attributable to your public education and participation program during this reporting period:  
During the September 8, 2018 stream cleanup,volunteers and City employees cleaned 790 lbs of trash (tires, car pats, lumber, debris, plastic, etc) from Slater's Creek in Millersville and Goodlettsville.  
  
Millersville staff also attended the August, December, February, March, May, and June MTSG meetings. Educational topics included: biodiversity in area streams, ordinance enforcement, stormwater maintenance agreements, site inspections, and construction entrances.  
  
The City participated in 250K Tree Daythrough the Tennessee Environmental Council. We received approximately 100 trees for distribution throughout the city. Statewide, more than 97,000 trees were planted resulting in an estimated runoff reduction of 84.5 million gallons.

4. Illicit Discharge Detection and Elimination (Section 4.2.3)

- A. Have you developed and do you continue to update a storm sewer system map that shows the location of system outfalls where the municipal storm sewer system discharges into waters of the state or conveyances owned or operated by another MS4?  Yes  No
- B. If yes, does the map include inputs into the storm sewer collection system, such as the inlets, catch basins, drop structures or other defined contributing points to the sewershed of that outfall, and general direction of stormwater flow?  Yes  No
- C. How many outfalls have you identified in your storm sewer system? 42

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- D. Do you have an ordinance, or other regulatory mechanism, that prohibits non-stormwater discharges into your storm sewer system?  Yes  No
- E. Have you implemented a plan to detect, identify and eliminate non-stormwater discharges, including illegal disposal, throughout the storm sewer system? If yes, provide a summary: During the 2019 Audit of the City's MS4 program, TDEC noted that the City's IDDE program is not in compliance. The City will address this in the coming year and implement a plan.  Yes  No
- F. How many illicit discharge related complaints were received this reporting period? 1
- G. How many illicit discharge investigations were performed this reporting period? 1
- H. Of those investigations performed, how many resulted in valid illicit discharges that were addressed and/or eliminated? 1
5. Construction Site Stormwater Runoff Pollutant Control (Section 4.2.4)
- A. Do you have an ordinance or other regulatory mechanism requiring:
- Construction site operators to implement appropriate erosion prevention and sediment control BMPs consistent with those described in the TDEC EPSC Handbook?  Yes  No
- Construction site operators to control wastes such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste?  Yes  No
- Design storm and special conditions for unavailable parameters waters or Exceptional Tennessee Waters consistent with those of the current Tennessee Construction General Permit (TNR100000)?  Yes  No
- B. Do you have specific procedures for construction site plan (including erosion prevention and sediment BMPs) review and approval?  Yes  No
- C. Do you have sanctions to enforce compliance?  Yes  No
- D. Do you hold pre-construction meetings with operators of priority construction activities and inspect priority construction sites at least monthly?  Yes  No
- E. How many construction sites disturbing at least one acre or greater were active in your jurisdiction this reporting period? 1
- F. How many active priority and non-priority construction sites were inspected this reporting period? 1
- G. How many construction related complaints were received this reporting period? 0
6. Permanent Stormwater Management at New Development and Redevelopment Projects (Section 4.2.5)
- A. Do you have a regulatory mechanism (e.g. ordinance) requiring permanent stormwater pollutant removal for development and redevelopment projects? If no, have you submitted an Implementation Plan to the Division?  Yes  No  
 Yes  No
- B. Do you have an ordinance or other regulatory mechanism requiring:
- Site plan review and approval of new and re-development projects?  Yes  No
- A process to ensure stormwater control measures (SCMs) are properly installed and maintained?  Yes  No

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Permanent water quality riparian buffers? If yes, specify requirements: The current ordinance requirements are 50 feet from the floodway line if one has been established, otherwise 25 feet from top of bank. It should be noted that TDEC has requested that this  Yes  No  
be updated to match the standards outlined in the permit.

- C. What is the threshold for development and redevelopment project plans plan review (e.g., all projects, projects disturbing greater than one acre, etc.)? 1 acre of disturbance per ordinance, however all commercial site plans require site plan review, including EPSC and Permanent Stormwater
- D. How many development and redevelopment project plans were reviewed for this reporting period? 2
- E. How many development and redevelopment project plans were approved? 2
- F. How many permanent stormwater related complaints were received this reporting period? 0
- G. How many enforcement actions were taken to address improper installation or maintenance? 1
- H. Do you have a system to inventory and track the status of all public and private SCMs installed on development and redevelopment projects?  Yes  No
- I. Does your program include an off-site stormwater mitigation or payment into public stormwater fund? If yes, specify. \_\_\_\_\_  Yes  No

7. Stormwater Management for Municipal Operations (Section 4.2.6)

- A. As applicable, have stormwater related operation and maintenance plans that include information related to maintenance activities, schedules and the proper disposal of waste from structural and non-structural stormwater controls been developed and implemented at the following municipal operations:
  - Streets, roads, highways?  Yes  No
  - Municipal parking lots?  Yes  No
  - Maintenance and storage yards?  Yes  No
  - Fleet or maintenance shops with outdoor storage areas?  Yes  No
  - Salt and storage locations?  Yes  No
  - Snow disposal areas?  Yes  No
  - Waste disposal, storage, and transfer stations?  Yes  No
- B. Do you have a training program for employees responsible for municipal operations at facilities within the jurisdiction that handle, generate and/or store materials which constitute a potential pollutant of concern for MS4s?  Yes  No
  - If yes, are new applicable employees trained within six months, and existing applicable employees trained and/or retrained within the permit term?  Yes  No

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

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

Modifications or replacement of an ineffective activity/control measure. \_\_\_\_\_

Changes to the program as required by the division to satisfy permit requirements. \_\_\_\_\_

Information (e.g. additional acreage, outfalls, BMPs) on newly annexed areas and any resulting updates to your program. \_\_\_\_\_

- B. In preparation for this annual report, have you performed an overall assessment of your stormwater management program effectiveness? If yes, summarize the assessment results, and any modifications and improvements scheduled to be implemented in the next reporting period. 1. Update Public Information and Education (PIE) Plan

The City's existing PIE plan is too general and needs to be updated to provide specific information regarding action items. The City will create a list of educational opportunities and provide a schedule for implementation. Part of the plan will include adding educational materials to the City's website, publishing notices of community events focused on stormwater education, and distributing brochures to targeted audiences. A list of planned activities and the schedule will be added to the plan. It is anticipated that at least one public education activity will occur every other month for the duration of the current permit cycle. The updated PIE Plan will be completed by June 30, 2020, and it will be updated as new events are planned.

2. Document implementation of PIE plan and evaluate effectiveness

Once a schedule of public education events has been developed, these items will be added to a spreadsheet. Upon completion of the specific activity, the spreadsheet will be updated to include pertinent information related to the event (i.e. number of participants, record of distributed material, etc.). To evaluate the effectiveness, measurable goals will be established for each activity. Each year, City staff and our consultant engineer will meet to review the objectives and the plan and evaluate if goals are being met.

Yes

No

3. Tracking of Public Involvement

One element of the PIE plan will include City-sponsored events focused on stormwater management. As these events occur, the City will record attendance and solicit feedback for improving future events. The documentation of involvement will be maintained with the PIE plan. It is anticipated that at least two public events will be scheduled per year. In addition to these events, the City will include an agenda item during public meetings throughout the year that provide an opportunity for the City Commission to hear updates on the stormwater program as well as offer citizens a chance to speak about stormwater concerns. The minutes of these meetings will be documented with the PIE plan.

4. Illicit Discharge Elimination plan implementation

To begin the process of IDDE implementation, the City will develop a plan to map and inspect the stormwater outfalls within the City. As the outfalls are identified, they will be screened for dry-weather discharges and outfall inspection forms will be completed to document the conditions. Additionally, the City will create a list of known "hot-spots" within the city to identify locations that have a higher potential for discharging pollutants. Once the hotspots are known, each will be inspected annually to ensure that appropriate measures are in place to prevent contaminated stormwater from leaving the site. The City will begin mapping outfalls this year and aim to have all outfalls mapped and inspected by the end of the current permit cycle (October 2021). The list of hotspots will

be created by December 30, 2019 and each will be inspected at least one time by the end of 2020.

5. Storm system map

The City will engage the services of our engineering consultant to create a GIS-based map of the city's stormwater system. The map will include the approximate locations of ditches, wet-weather conveyances, streams, outfalls, culverts, storm sewer inlets, and topographic information. The City currently has paper maps that will be used as the basis for the updated digital map which can be more easily maintained in the future. The base map will be created by June 30, 2020 and elements will be added as they are located in the field. A complete map will be finished by the end of the current permit cycle.

6. Stormwater Ordinance Revision

To be consistent with the current Permit, the City will revise its stormwater ordinance to remove the clause that allows for waivers from Land Disturbance permits at the discretion of staff. Additionally, the buffer zone policy will be amended to reflect the minimum buffer widths provided in the permit. This amendment will be completed in 2020.

7. Pre-Construction meetings and Construction Site inspections

All new developments that require a land disturbance permit from the City will be required to have a pre-construction conference prior to issuance of a permit. These meetings will inform the developer and contractor about the City's stormwater policies and inspection procedures. City staff will inspect each site once per month and document the inspections on updated forms prepared by our engineering consultant. Rather than issuing verbal warnings to contractors, city inspectors will now send warnings or any other project correspondence via email, so that the communications can be documented with the city's stormwater program.

8. Plan Review procedure

The City will continue to utilize our engineering consultant to review construction plans for new development. They will be tasked with creating and utilizing a new checklist for documenting the review of EPSC and permanent stormwater control measures. This checklist will be consistent with the plan requirements of the CGP.

9. Develop more specific Operation and Maintenance (O&M) Plans for municipal operations

10. Document O&M activity

The Department of Public Works is responsible for O&M on City owned facilities. The Director of Public Works, Jerry Schrader, will work with our engineering consultant to write new SOP manuals for the following:

- Good Housekeeping
- Hazardous Material Storage
- Pump Stations
- Spill Preventions & Response
- Top Soil
- Construction

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- Refueling
- Road Salt Storage & Application
- Roadway Maintenance
- Sanitary Sewer Maintenance
- Storm Drain Cleaning
- Street Sweeping
- Vehicle & Equipment Washing
- Vehicle Maintenance

These SOPs will be written by the end of 2020, and there will be a scheduled session to educate staff on the use of these manuals. As these tasks are performed throughout the remainder of the permit cycle, the staff will complete checklists to ensure that the procedures are being adhered to.

9. Enforcement Response Plan (Section 4.5)

- A. Have you implemented an enforcement response plan that includes progressive enforcement actions to address non-compliance, and allows the maximum penalties specified in TCA 68-221-1106? If no, explain. \_\_\_\_\_  Yes  No
- B. As applicable, identify which of the following types of enforcement actions (or their equivalent) were used during this reporting period; indicate the number of actions, the minimum measure (e.g., construction, illicit discharge, permanent stormwater management), and note those for which you do not have authority:

<u>Action</u>	<u>Construction</u>	<u>Permanent Stormwater</u>	<u>Illicit Discharge</u>	<u>In Your ERP?</u>	
Verbal warnings	# <u>3</u>	# <u>0</u>	# _____	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Written notices	# <u>1</u>	# <u>1</u>	# <u>1</u>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Citations with administrative penalties	# <u>0</u>	# <u>0</u>	# _____	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Stop work orders	# <u>0</u>	# <u>0</u>	# _____	<input checked="" type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Withholding of plan approvals or other authorizations	# <u>0</u>	# <u>0</u>	# _____	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Additional Measures	# <u>0</u>	# <u>0</u>	# _____	Describe: _____	

- C. Do you track instances of non-compliance and related enforcement documentation?  Yes  No
- D. What were the most common types of non-compliance instances documented during this reporting period?  
Improper installation of stormwater detention pond, failure to maintain construction site BMPs

