



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 Maryville		MS4 Permit Number: TNS075434
Contact Person: Chuck Rowan		Email Address: crowan@maryville-tn.gov
Telephone: (865) 273-3506		MS4 Program Web Address: http://www.maryvillegov.com/storm-water-management.html
Mailing Address: 416 W. Broadway Ave.		
City: Maryville	State: TN	ZIP code: 37801

What is the current population of your MS4? 32,263 (source: census.gov)

What is the reporting period for this annual report? July1 2021 to June 30 2022

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

- A. Does your MS4 discharge into waters with unavailable parameters (previously referred to as impaired) for pathogens, nutrients, siltation or other parameters related to stormwater runoff from urbanized areas as listed on TN's most current 303(d) list and/or according to the on-line state GIS mapping tool (tdeconline.tn.gov/dwr/)? If yes, attach a list. Yes No
- B. Are there established and approved TMDLs (<http://www.tn.gov/environment/article/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)? 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: Best management practices, as listed in the City's NOI and in this annual report, address relevant stormwater management activities, which include but are not limited to public education and involvement, construction site runoff management requirements, and the requirements and policies for permanent stormwater management. These programs are implemented in areas that discharge to waterbodies with unavailable parameters. For example, the City's construction site management program requires and oversees that applicable land developments comply with the State of Tennessee General Permit Number TNR100000 "Stormwater Discharges from Construction Activities", including section 5.4 entitled "Discharges into Waters with Unavailable Parameters or Exceptional Tennessee Waters". The permanent stormwater management program requires planning for water quality and management of stormwater beyond construction phase of development or re-development. 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: See PIE Plan Table 3 in Appendix C Yes No
- C. Do you have a webpage dedicated to your stormwater program? If yes, provide a link/URL: http://www.maryvillegov.com/storm-water-management.html Yes No
- D. Summarize how you advertise and publicize your public education, outreach, involvement and participation opportunities: Public education, outreach, involvement and participation opportunities are advertised on the City website as well as through the Keep Blount Beautiful website.
- E. Summarize the public education, outreach, involvement and participation activities you completed during this reporting period: As a member of the Tennessee Stormwater Association (TNSA), Maryville is included in TNSA's social media campaign efforts. Educational posts are created for Facebook and Instagram that include topics like reducing toxic runoff through fertilizer control, how to dispose of household hazardous waste, litter and plastic reduction in streams, pet waste disposal, and the benefits of rain gardens. The City also supports Keep Blount Beautiful (KBB) in their cleanup events and educational programming efforts. KBB is a nonprofit organization under the Keep America Beautiful umbrella that aims to encourage and educate Blount County residents, including those in the County's incorporated cities, to take action to improve and beautify their community.
- 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 2021-2022 reporting year, an average of 306,043 impressions (instances of content on screen) were made for each Facebook/Instagram post. An excerpt from the 11-page TNSA Social Media Report is found in Appendix D, and the full report is available upon request. During the reporting period, KBB educated 202 youth in the Maryville school system on topics including water quality, stream health, and environmental service. Efforts through KBB also included the removal of 3,098 pounds of trash with 223 volunteers over 21 cleanup events. See Appendix D for more information.

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? 266
- 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: IDDE Standard Operating Procedure rev. 2011 Yes No
- F. How many illicit discharge related complaints were received this reporting period? 8
- G. How many illicit discharge investigations were performed this reporting period? 8

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H. Of those investigations performed, how many resulted in valid illicit discharges that were addressed and/or eliminated? 8

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? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| Construction site operators to control wastes such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> 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)? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> 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? 19
- F. How many active priority and non-priority construction sites were inspected this reporting period? 6 priority and 13 non-priority sites were inspected
- G. How many construction related complaints were received this reporting period? 6

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? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| A process to ensure stormwater control measures (SCMs) are properly installed and maintained? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| Permanent water quality riparian buffers? If yes, specify requirements: <u>Title 19, Chp. 7 Vegetated Buffer Zone and Stormwater Quality Management and policy manual</u> | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
- C. What is the threshold for development and redevelopment project plans plan review (e.g., all projects, projects disturbing greater than one acre, etc.)? All Projects
- D. How many development and redevelopment project plans were reviewed for this reporting period? 33
- E. How many development and redevelopment project plans were approved? 26
- 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? 0

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- 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. NA

Changes to the program as required by the division to satisfy permit requirements. In response to a permit compliance audit performed by TDEC in February 2022, the City made the following changes to the program. 1) The City began documenting its review of design plan conformance with technical standards consistent with the State of Tennessee's Construction General Permit. 2) The City implemented corrective actions at the City Operations Center located on Home Avenue to address four issues noted by TDEC during their inspection of the facility. More descriptive information on these issues were provided in an audit response letter to TDEC, dated April 19, 2022. This letter is provided in Appendix E. 3) The City modified the staff training to include include stormwater pollution training videos as part of the required safety training for all construction and maintenance crews (water, sewer, streets, sanitation). This will be done on an annual basis and as part of the new-hire orientation. Documentation will be kept for frequency and attendance.

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

- 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. During the next reporting period, the City will update the PIE Plan, as indicated by the letter in Appendix E and in light of the new public education and public involvement requirement in the new (2022) permit. Additionally, the City will begin evaluating the stormwater ordinance in light of the audit results and the changes to minimum control measures 4 and 5 in the new (2022) permit. This evaluation is anticipated to begin by November 1, 2022, but will take more than 12 months to complete. So, although the City will be evaluating and preparing for modifications to its program during the reporting period, full adoption of the revised ordinance will likely not occur in the next reporting period. The new (2022) permit allows up to 24 months for these program/ordinance revisions.

Yes

No

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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>22</u>	# <u>0</u>	# <u>8</u>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Written notices	# <u>6</u>	# <u>0</u>	# <u>0</u>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Citations with administrative penalties	# <u>0</u>	# <u>0</u>	# <u>0</u>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Stop work orders	# <u>1</u>	# <u>0</u>	# <u>0</u>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Withholding of plan approvals or other authorizations	# <u>0</u>	# <u>0</u>	# <u>0</u>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Additional Measures	# <u>0</u>	# <u>0</u>	# <u>0</u>	Describe: <u>NA</u>	

- 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? Failure to maintain erosion and sediment controls. Of the 8 Illicit Discharge Verbal Warnings, 6 were construction related.

10. Monitoring, Recordkeeping and reporting (Section 5)

- A. Summarize any analytical monitoring activities (e.g., planning, collection, evaluation of results) performed during this reporting period. On behalf of the City of Maryville, LDA provided monitoring results for Permit Year 2020-21 on October 1st, 2021 to TDEC as this data was not available by the deadline for the Permit Year 2020-21 Annual Report.
- B. Summarize any non-analytical monitoring activities (e.g., planning, collection, evaluation of results) performed during this reporting period. On behalf of the City of Maryville, LDA provided monitoring results for Permit Year 2020-21 on October 1st, 2021 to TDEC as this data was not available by the deadline for the Permit Year 2020-21 Annual Report.
- C. If applicable, are monitoring records for activities performed during this reporting period submitted with this report. Yes No

11. Certification

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

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

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

Printed Name and Title

Signature

Date

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

EFO	Street Address	City	Zip Code	Telephone
Chattanooga	1301 Riverfront Pkwy, Suite 206	Chattanooga	37402	(423) 634-5745
Columbia	1421 Hampshire Pike	Columbia	38401	(931) 380-3371
Cookeville	1221 South Willow Ave.	Cookeville	38506	(931) 520-6688
Jackson	1625 Hollywood Drive	Jackson	38305	(731) 512-1300
Johnson City	2305 Silverdale Road	Johnson City	37601	(423) 854-5400
Knoxville	3711 Middlebrook Pike	Knoxville	37921	(865) 594-6035
Memphis	8383 Wolf Lake Drive	Bartlett	38133	(901) 371-3000
Nashville	711 R S Gass Boulevard	Nashville	37216	(615) 687-7000

City of Maryville
Municipal Separate Storm Sewer System (MS4) Annual Report
Reporting Period: July 1, 2021 to June 30, 2022

List of Appendices

Appendix ID	Content	Annual Report Section Reference
Appendix A	List of Impaired Waters	Section 2A
Appendix B	TMDL List	Section 2B
Appendix C	Public Information & Education (PIE) Plan Excerpt	Section 3B
Appendix D	Public Education/Engagement Activities	Section 3E
Appendix E	TDEC Audit Response Letter	Section 8A

Appendix A

List of Waters with Unavailable Parameters for Nutrients, Pathogens, Siltation or Habitat Alteration Annual Report Section 2A

Table 1: List of Impaired Waters

Waterbody I.D. #	Cause	TMDL Priority	Source
TN06010201 026_0400 Pistol Creek	Loss of biological integrity due to siltation	NA	Municipal
	Loss of biological integrity due to Escherichia coli	NA	Municipal
TN06010201 026_0410 Springfield Branch	Loss of biological integrity due to siltation	NA	Municipal
	Loss of biological integrity due to Nitrate/Nitrite	Low	Municipal
	Loss of biological integrity due to Escherichia coli	Low	Municipal
TN06010201 026_0420 Brown Creek	Alteration in stream-side or littoral vegetative covers	NA	Municipal
	Loss of biological integrity due to Nutrients	Low	Municipal
	Loss of biological integrity due to Escherichia coli	NA	Municipal
	Loss of biological integrity due to siltation	NA	Municipal
TN06010201 026_0430 Culton Creek	Loss of biological integrity due to siltation	Low	Municipal
	Loss of biological integrity due to Escherichia coli	NA	Municipal
	Loss of biological integrity due to Nitrate/Nitrite	Low	Municipal
TN06010201 027_0400 Peppermint Branch	Loss of biological integrity due to Escherichia coli	NA	Municipal

Appendix B

Established and Approved TMDLs Annual Report Section 2B

Table 2: TMDL List

TMDL Name	Date
TMDL for Siltation and Habitat Alteration Ft. Loudon Lake Watershed HUC 06010201	February 1, 2006
TMDL for E. Coli in the Ft. Loudon Lake Watershed HUC 06010201	January 12, 2017
TMDL for Pathogens in the Little River Subwatershed of the Ft. Loudon Lake Watershed HUC 06010201	November 21, 2005

Appendix C

City of Maryville Public Education & Information (PIE) Plan (excerpt) Annual Report Section 3B

Table 3: PIE Plan Target for the City of Maryville TN, rev. 2012 (excerpt from SWMP):

Target Streams	Target Pollutants	Target Audience(s)
<ul style="list-style-type: none"> - Brown Creek - Laurel Bank Branch - Pistol Creek - Springfield Branch 	<ul style="list-style-type: none"> Nitrates + Nitrites e. Coli Siltation Habitat Loss Due to Flow Alteration Loss in Stream-Side or Littoral Cover 	<ul style="list-style-type: none"> Land Developers Engineers Construction Workers General Public Municipal Employees

Appendix D

Public Education/Engagement Activities Annual Report Section 3F

The public education and engagement activities performed or supported during this permit year are provided on the following pages and includes record of collaboration with Keep Blount Beautiful (Tables 4 and 5), as well as Facebook Ad reports (Table 6) for social media platform services offered by the TN Stormwater Association (TNSA). The City supports Keep Blount Beautiful, TNSA, and other groups with initiatives aligned with stormwater education and awareness. This support is provided either directly or in-kind through advertising, meeting space, staff, equipment, or municipal services as contribution.

KBB Stormwater Outreach & Education Events

Table 4: KBB Maryville-Specific Education Programs & Events 2021-2022

Date	Event	Length	Program Type	Age Group	Youth
Sept 8	Lanier Elementary Fred the Fish and Watershed	0.5	Fred the Fish and Watershed	3rd	15
Sept 8	Lanier Elementary Fred the Fish and Watershed	0.5	Fred the Fish and Watershed	3rd	13
Sept 8	Lanier Elementary Fred the Fish and Watershed	0.5	Fred the Fish and Watershed	3rd	10
Sept 17	WaterFest AM	2	WaterFest	3rd	50
Sept 17	WaterFest PM	2	WaterFest	2nd-6th	5
14-Oct	Montgomery Ridge Intermediate Serve Day	2.5	Litter Pickup	4th-7th	10
14-Oct	Montgomery Ridge Intermediate Serve Day	2	Litter Pickup	4th-7th	8
17-Nov	Foothills EI 3rd Grade Earth Club	1	Fred the Fish and Watershed	3rd grade	20
12-Jan	Foothills EI 3rd Grade Earth Club	1	3 R's	3rd grade	30
26-Jan	Foothills EI 3rd Grade Earth Club	1	Soil Erosion	3rd grade	25
14-May	Stream School	1	Stream School	Elementary	16
TOTAL					202

Table 5: KBB Maryville-Specific Cleanup Information 2021-2022

Date	Event	Length of Event	Volunteers	Volunteer Hours	Value (\$26.02)	Bags of Trash	lbs of Trash
6-Jul	Epic Nine Marketing AAM	2	8	16	\$416.32	5	75
17-Jul	The Wood Family AAM	2	5	10	\$260.20	4	60
Sept 18	Allevia Technology AAM	2	14	28	\$728.56	13	195
25-Sep	DASH for TRASH at Blackberry Farm Brewery	1	15	15	\$390.30	14	210
Oct 5	BHEA AAM	1	2	2	\$52.04	2	30
Oct 13	Epic Nine AAM	2	8	16	\$416.32	3	45
16-Oct	Blackberry Farm Brewery AAM	2	4	8	\$208.16	5	75
29-Nov	Epic Nine AAM	2	11	22	\$572.44	3	45
4-Dec	Trout Unlimited cleanup	2	22	44	\$1,144.88	15	225
4-Dec	PIVOT TN Cleanup	2	14	28	\$728.56	24	360
19-Dec	Worthington Neighbors AAM	2	6	12	\$312.24	14	210
22-Jan	Pick Up for a Pint	0.5	16	8	\$208.16	15	225
6 Feb	Worthington Neighbors AAM	2	8	16	\$416.32	14	210
26-Mar	Trout Unlimited Cleanup	2.5	25	62.5	\$1,626.25	15	225
27-Mar	Worthington Neighbors AAM	2	2	4	\$104.08	10	150
18-Apr	Epic Nine AAM	1.5	10	15	\$390.30	3	45
20-Apr	MC Court St. Clenaup	1	16	16	\$416.32	1.5	22.5
4/23	Allevia Technology AAM	1.5	13	19.5	\$507.39	13	195
18-Jun	Dash for Trash at Richy Krems Donuts	1	14	14	\$36,428.00	15	225
18-Jun	Russell and Abbott AAM	3	5	15	\$390.30	10	150
18-Jun	Worthington Neighbors AAM	1	5	5	\$130.10	8	120
TOTAL			223	376	\$45,847.24	206.5	3,098

(AAM = Adopt-A-Mile)

Table 6: Exerpt from 11-page TNSA Social Media Ads Report

TNSA 2021-2022 Social Media Campaign Final Numbers							
		Impressions	Post Interactions*	Link Clicks	Total Clicks**		
May Ad 1	Green grass is healthy grass. When using fertilizer to beautify your lawn, use it sparingly to keep excess fertilizer out of storm drains.	25,088	15,072	25,600	8,752	74,512	98%
May Ad 2	Compostable, biodegradable products offer an eco-friendly alternative to traditional single-use plastics as they can disintegrate into non-toxic, natural elements. These products are great options to help reduce litter and protect our waterways.	19,267	11,122	22,628	7,153	60,170	98%
June Ad 1	Many enjoy washing their car in the driveway on a nice summer day, but did you know that car washes have specialized drainage systems that prevent chemicals from reaching our waterways? If given the option, choose a car wash.	21,360	16,464	23,360	8,096	69,280	98%
June Ad 2	Did you know the things we do around the house every day can affect our rivers and streams? Many cleaning products found in homes shouldn't be flushed down the drain. Environmentally-friendly products that are free of chlorine or phosphate can be better alternatives to help protect our waterways.	20,272	13,184	20,128	6,832	60,416	98%
	Total	306,043	198,768	311,401	102,429	918,641	

Appendix E
TDEC Audit Response Letter April 2022 (5 pages)
Annual Report Section 8A



April 19, 2022

Brown Patton
Division of Water Resources
Tennessee Department of Environment and Conservation
312 Rosa L Parks Avenue
Nashville, TN 37243

RE: Letter of response to audit of City of Maryville Small Municipal Separate Storm Sewer System National Pollutant Discharge Elimination System Permit
NPDES Permit Tracking Number TNS075434
City of Maryville
Blount County, Tennessee

Dear Mr. Patton:

On February 22 and 23, 2022, you and Christie Renfro, in your capacity as employees of the Tennessee Department of Environment and Conservation (TDEC), Division of Water Resources (Division) conducted an audit of the City of Maryville's Municipal Separate Storm Sewer System (MS4) program. The purpose of the audit was to determine the City's compliance with the NPDES General Permit for Discharges from Small Municipal Separate Sewer Systems (permit). The Division's audit findings and resulting required actions were provided to the City in a letter from you addressed to Andy White, Mayor, and dated March 22, 2022. The letter requested a written response within 30-days of letter receipt, describing what steps the City has, or will be, taken to address the required actions.

The table below presents the required actions and provides the City's response to address each action and proposed timeline or deadline.

1. Public Information and Education (PIE) plan

Required Action: Update the PIE plan to address all applicable target audiences

City Response: The PIE plan will be updated to address all applicable target audiences within 150 days of the effective date of the next permit.

Rationale: TDEC recently published the next permit in draft, with the intention of publishing the permit in 2022. The public education and outreach minimum control measures (MCM) of the draft permit includes increased detail regarding specific target audiences and measurable goals.

The City wishes to be both cost and time effective in permit compliance activity management and reporting. The City will examine and determine necessary changes to its compliance activities as it prepares the Notice of Intent (NOI) for the next permit. This will be the first step in planning for new PIE activities. After NOI preparation, the City will be well-positioned to also update the PIE plan so that it aligns with the new permit and NOI. The NOI is due within 90 days of the effective date of the next permit. Another two months (60 days) after NOI submittal is sufficient to fully consider PIE goals, determine costs and actions needed for activity revision or additions (if any), and revise the PIE plan.

2. Priority construction activity

Required Action: Update the construction stormwater program to define priority construction activity

City Response: The City's response is two-fold, as indicated below.

- The City will continue to require priority construction activities to adhere to specific increased design standards pertaining to design storms, sediment basins, and buffers. See the City response for item 4 (below) for proposed actions to ensure this continues.
- The next time the City revises its stormwater ordinance, relevant portions of the ordinance (Title 19, Chapter 3) will be modified to be consistent with the State's definition of, and requirements for, priority construction activities including those discharging directly to or immediately upstream of unavailable parameter waters or Exceptional Tennessee Waters. Note: the City intends to revise its ordinance within 12 to 24 months of the effective date of the next permit.

Rationale: The City defines priority construction activity in the stormwater ordinance (Maryville Municipal Code §19-303). This definition combined with the City's requirements for construction site management at all land developments of 0.1 acre and greater provide for effective regulation of priority construction activities. Design and construction requirements for said activities are in keeping with the permit and CGP. However, the City acknowledges the ordinance is not wholly aligned with the State's definition as it pertains to land developments smaller than 1 acre and part of a common plan of development.

3. Common plan of development

Required Action: Clarify construction activity requirements for activities that result in land disturbance less than one acre when part of a common plan of development the next time the MS4 revises the ordinance.

City Response: The next time the City revises its stormwater ordinance, relevant portions of the ordinance (Title 19, Chapter 3) will be modified to clarify construction activity requirements for

activities that result in land disturbance less than one acre when part of a common plan of development. Note: the City intends to revise its ordinance within 12 to 24 months of the effective date of the next permit.

Rationale: The City requires construction site management at all land developments of 0.1 acre and greater. While this provides for effective regulation small sites, it is acknowledged that specific identification of land developments smaller than 1 acre and part of a common plan of development will close a potential loophole in City requirements, relative to required permit conditions.

4. Plans review consistency with the CGP

Required Action: Revise plans review to include procedures and review of technical standards consistent with the CGP (buffer, design storm, basin drainage requirement).

City Response: The City will determine the appropriate procedure and documentation approach and begin documenting its review of the technical standards consistent with the CGP, as stated in the required action, no later than April 30, 2022.

Rationale: The City's plan review procedures (unwritten) do include review of all the elements stated in the required action. When a plan does not adhere to technical standards consistent with the CGP, the plan reviewer notes this on the plan and returns it to the site designer for correction. However, it is acknowledged these procedures are not formally documented by the plan reviewer unless issues are noted with the design. Thus, the City will revise its procedure and document these reviews.

5. Municipal operations employee training

Required Action: Revise training program to include all employees responsible for municipal operations which constitute a potential pollutant concern for the municipality

City Response: The City will investigate its municipal employee training program to determine which employees require training, and to develop a consistent, long-term plan for training frequency, format/mechanism, and documentation. The City will determine an appropriate long-term solution by the end of this permit year (June 30, 2022). The revised training program will be described as a compliance activity modification in the City's next annual report and will be included in the City's next NOI, to be implemented by the end of the next permit year (June 30, 2023).

Rationale: not applicable

6. Corrective actions at municipal facility

Required Action: Address corrective actions at municipal facility

City Response: The City's response addresses four issues identified at the City's Operations Center facility located on Home Avenue.

- Issue identified by TDEC: Trash and debris around the fence line and outside of the fence near the storage area used for the sway cars/trailers that are used for trash collection

City Response: City employees will inspect and collect/remove trash on a weekly basis in the area used for the sway cars/trailers.

- Issue identified by TDEC: Vehicle staging area in need of maintenance and staining observed on the ground under the vehicles

City Response: City employees will inspect and maintain the vehicle staging area on a weekly basis, keeping it free of trash and other potential pollutant issues. Vehicle maintenance, drip pans, and other appropriate measures will be used to prevent leaks or collect leaking fluids from vehicles and equipment located in the staging area.

- Issue identified by TDEC: Erosion noted at the back of the gravel lot and pothole drying area

City Response: Erosion prevention and sediment control (EPSC) measures have been established to prevent further erosion of the area and the discharge of sediment offsite. These measures are temporary but will be maintained for as long as necessary by the City's Water and Sewer Department until a permanent solution can be implemented. The Department is evaluating the need for an improved construction materials management area and will identify a more permanent repair and solution for this issue. Permanent repair and stabilization will occur within six months.

- Issue identified by TDEC: Increase inspection frequency (once per permit cycle)

City Response: The City will increase the facility inspection frequency from once per permit cycle to once per year. Inspections will be performed by City staff or a third party.

Rationale: not applicable

7. Annual Report deadline

Required Action: Submit annual report to the Division by Sept 30th of each calendar year

City Response: The City will take steps to begin annual report preparation earlier, such that the report is submitted to the Division by September 30th of each calendar year.

Rationale: The Division stated the 2017 annual report was submitted approximately two weeks late. All other reports since 2003 have been submitted on-time.

The City of Maryville appreciates the response from the Division regarding the audit. If you have any questions or concerns regarding the information provided in this letter, please contact Dale Jayne, Stormwater Program Manager at 865-273-3512 or via email at dfjayne@maryville-tn.gov.

Sincerely,

A handwritten signature in black ink that reads "Dale F. Jayne". The signature is written in a cursive style with a large, looped initial "D".

Dale Jayne
Stormwater Program Manager

CC: Kevin Stoltenburg PE, City of Maryville, ktstoltenburg@cityofmaryville-tn.gov
Mary Halley, Wood Environment & Infrastructure Solutions, Inc., mary.halley@woodplc.com