

STORMWATER MANAGEMENT PROGRAM (SWMP)

The MS4 stormwater(sw) permit of 2022 requires development, implementation and enforcement of a Stormwater Management Program (SWMP) to protect water quality and to satisfy the water quality requirements of federal clean water act (CWA). This document lays out the Town’s program which is designed to meet the minimum requirements of the 2022 MS4 permit issued by TDEC with an effective date of September 1, 2022. This program will minimize the discharge of pollutants to the maximum extent practicable (MEP) and will not cause or contribute to violations of State water quality criteria of the receiving streams in stormwater runoff from the MS4 system.

Additionally, the Town will change ordinances, standard operating procedures (SOP), local stormwater control measures (SCM), forms and any other items necessary to fully comply with the 2022 MS4 permit and the applicable portions of the 2021 CGP. This will be accomplished by implementing SCM, BMP and other measures needed to minimize the discharge of pollutants to the maximum extend practicable (MEP) and shall not cause or contribute to violations of State water quality criteria of the receiving streams in stormwater runoff from the MS4 system. This system will feature BMPs with milestone and a means of tracking effectiveness as necessary to comply with permit requirements for each of minimum control measures specified in the permit. These are as outlined below;

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SECTION I and II BMPs and MEASURBABLE GOALS FOR EACH OF THE MINIMUM CONTROL MEASURES DESCRIBED IN THE PERMIT

- A. **Public Education and Outreach on Stormwater Impacts:** The web site of Town and participation in the TNSA Educational Program will be the primary means of providing educational opportunities to the target audiences. We will also participate in public events such as festivals and community parties with educational opportunities. Multiple target audiences and issues may be included in any such event. BMPs are:

BMP 1A: Web Site. Keep the web site current. Use it to announce public involvement opportunities and to announce educational events.		
Year	Event	Measurable goal/how measured.
1	Update to new permit requirements (NPR)	Current/yes, no
2-5	Review annually, change if needed w/public involvement.	Reviewed/yes, no

BMP 2A: Participate in TNSA Educational Program		
1-5	Participate in Program	Participated/yes, no

BMP 3A: Public Events. Conduct public events such as educational table at local festivals, include brochures or fact sheets on issues aimed as target audiences as dictated in the permit.		
Year	Event	Measurable goal/how measured
1	Identify products and costs, budget & receive funds	Fund rec/yes, no
2	Obtain products, conduct first event w/products	Product taken/yes, no
3-5	At least one more event during the permit period	Product taken/yes, no

BMP 4A: Update the Public Information and Education (PIE) Plan to comply with new permit requirements and keep current.		
Year	Event	Measurable goal/how measured
1	Update to NPR; thereafter, keep up to date	Current/yes, no
2-5	DITTO	DITTO

BMP 5A: Library Display. Display stormwater handouts in the library keeping count of the number displayed.		
Year	Event	Measurable goal/how measured
1-5	Display SW information in library	Displayed/Number taken

B. **Public Involvement/Participation:** Primary means is through web site and public notices which invite public participation. Minimally, comply with permit requirements as far as public notice and participation opportunities. BMPs are:

BMP 1B Public Involvement Opportunities. Provide opportunities for the public to be involved in the stormwater process including program development, plans review and BMP development.		
Year	Event	Measurable goal/how measured
1	Announce opportunity	Opportunity Announced /Yes, no
2-5	Ditto	Ditto

BMP 2B: Public Announcements. Develop procedures to ensure required pub announcements or information are announced on the county web site, when applicable.		
Year	Event	Measurable goal/how measured
1	Add SWMP to web site	On site/yes, no
2	Develop procedures for public announcements of new developments/redevelopments and other applicable SW info.	Proc developed/yes, no
3-5	Review annually, change if needed.	Reviewed, yes, no

- C. **Illicit Discharge Detection and Elimination (IDDE):** The web site will include information on illicit discharges to include a means for the public to report illicit discharges including dumping. The Town will update the ordinance, SOPs, forms and other items necessary to fully comply with permit requirements as well as maintaining records of complaints and the follow-up to same, and maintaining the storm system map. BMPs are:

BMP 1C Update Ordinances and Procedures. The web site will contain information on illicit discharges to include a means for the public to report illicit discharges including dumping. Updates will include all changes necessary to comply with NPR and be effective NLT 8-31-24		
Year	Event	Measurable goal/how measured
1	Identify what needs to be changed, invite public	NA\
2	Complete review, begin/finish rewrites	Updated/Yes, no
3-5	Review annually, change if needed involve public	Reviewed/yes, no

BMP 2C Maintain Storm Sewer System Map: Add any new areas, update current if changed.		
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Year	Event	Measurable goal/how measured
1-5	Review map, update when needed.	Reviewed/yes/no

BMP 3C Maintain Records of Complaints. A record of complaints and action taken will be maintained.		
Year	Event	Measurable goal/how measured
1-5	Maintain log, review at least annually	Maintained/Yes, no

D. Construction Site Runoff Control: The web site and the Development Procedures Checklist will contain up to date information on the needs for stormwater controls, permits, inspections and the like. The Town will update the ordinance, SOPs, forms and other items necessary to fully comply with permit requirements as well as maintaining records of complaints and the follow-up to same; maintaining an inventory of active construction sites; and develop procedures for public access to information on new developments and redevelopments as well as procedures to consider public comments. BMPs are:

BMP 1D Update Ordinance and Procedures: The web site will contain information on new projects inviting the public to participate. Ordinance, SOPs, form and other data will be updated to comply with NPR including pertinent sections of the 2021 CGP and the next CGP when issued. Updates will be completed NLR 8-31-24.		
Year	Event	Measurable goal/How measured
1	Identify what needs changing, invite public	NA
2	Complete review, begin/finish rewrites	Updated/Yes, no
3-5	Review annually, change if needed	Reviewed/Yes, no

BMP 2D Construction Site Inventory. Maintain a current inventory of active construction sites with all the data and in the format specified in the permit.		
Year	Event	Measurable/goal/how measured
1	Revise current spreadsheet to NPR	Revised/Yes, no
2-5	Review annually, update as needed	Ditto

BMP 3D Attend Training. The stormwater manager will attend required training to include keeping certificate current.		
Year	Event	Measurable goal/how measured
1-5	Review requirement, attend training if needed	Up to date/Yes, no.

BMP 4D Complaint Tracking. A record of complaints and action taken will be maintained.		
Year	Event	Measurable goal/how measured
1	Update to comply with new permit requirements	Updated/yes, no
2-5	Review at least annually	Review/yes, no

E. Post-Construction/Permanent Stormwater Management in New Development and Redevelopment: The Town will study permit requirements to determine what has to be done, develop milestones, and make the necessary changes to fully comply with permit requirements. BMPs are:

BMP 1E: Update ordinance, SOPs, forms and other items necessary to fully comply with new permit requirement. All changes to be implemented by August 31, 2024		
Year	Event	Measurable goal/how measured
1	Determine changes needed, est cost, request/receive funding.	Funds rec/yes, no
2	Begin update including public participation, changes implemented by August 31, 2024	Implemented/yes, no
3-5	Review, change if needed	Reviewed/ yes, no

BMP 2E: Revise BMP tracking to be consistent with new permit requirements.		
Year	Event	Measurable goal/how measured
1	Revise existing to comply with NPR	Revised/yes, no
2-5	Review annually, change if needed	Reviewed/yes/no

BMP 3E: Design procedures to Track Maintenance of Permanent SCMs.		
Year	Event	Measurable goal/how measured
1	Begin design process	Began/Yes, no
2	Finish design, implement	Implement/yes, no
3-4	Review annually, update if needed	Reviewed/yes, no

F. Pollution Prevention/Good Housekeeping. The Town will review the Operations and Maintenance Program/Plan (O&MP), Standard Operating Procedures (SOP) and other items as needed to fully comply with NPR. BMP are:

BMP 1F: Employee Training. All employees of the Public Works Department will be trained on the impacts that work may impact water quality as follows:		
Year	Event	Measurable goal/how measured
1-5	All public work employees attend at least one training event.	Employees trained/yes, no
1-5	New employees trained within 6 months of being	Trained/yes, no

	hired.	

BMP 2F Update Operations and Maintenance Program: Update the O&MP to be consistent with NPR.		
Year	Event	Measurable goal/how measured
1	Update as required	Updated/yes, no
2-5	Review annually, revise if needed	Reviewed/yes, no

BMP 3F: Continue Litter Pickup Program		
Year	Event	Measurable goal/how measured
1-5	Pick up litter along streets and highways, maintain records	Picked up/yes, no

**SECTION III
PERSON RESPONSIBL**

At this writing, Vince Pishner, Stormwater Manager is the responsible person.

**SECTION IV
Specific Elements Detailed in the TDEC MS4 Permit**

1. Discharges to Waterbodies with Unavailable Parameters or Exceptional Tennessee Waters
None of these waters are in the Town limits. Stormwater discharges from the Town do flow/drain into waters with unavailable parameters but such waters are not in the Town. The Town therefore does not plan to conduct testing of such waters.
2. Plan Modification. Major modifications to this plan will be publicly announced and public comments considered prior to implementing major changes.
3. Enforcement. The Enforcement Plan will be updated to fully comply with NPR with public input.
4. Legal Authority. The Town will implement measures necessary to establish legal authority to fully comply with NPR. These will be reviewed and certified by the Town Attorney when required by permit language.

**SECTION V
INSPECTION AND MONITORING PROGRAM**

Document inspections conducted to include corrective action and civil penalties, if any, for all of the following types of inspections:

PRIORITY CONSTRUCTION SITES: At least monthly, inspect all control measures installed for proper maintenance and operation.

OTHER CONSTRUCTION SITES: All—inspect at a minimum once during the permit period.

On level/near level grade: Periodically, check that control measures are working until 75% stabilized then check only when problems with mud/silt/pollutants/other debris in street/stream.

On steeper grade: Periodically, at least quarterly, check that control measure are working until 75% stabilized then check as on level/near level grade unless problems with silt/pollutants on streets and/or in streams.

Problems with silt/pollutants on streets and/or in streams: Check more frequently but at least after every major storm event and then require appropriate corrective action, if needed.

ILLCITS FOUND OR REPORTED:

Within 7 workdays of the finding or complaint, initiate an investigation and determine whether or not further action is needed. If further action is warranted, identify who, what, where and get corrected ASAP. Follow up at least weekly until resolved. Document action taken, corrective action, and civil penalties, if any. Make a report to include but not be limited to the incident, findings, corrective action and penalties. Maintain the report in a file.

VINCE PISHNER
Stormwater Manager