

MEMORANDUM FOR RECORD

Subject: Citizen Involvement in Stormwater Management Program (SWMP) Development
January 27, 2023

1. A revised SWMP was developed to comply with the new MS4 permit. The requirement along with draft language of the revised SWMP were presented to the Stormwater Advisory Committee at the Planning Commission meeting January 26, 2023.
2. The Stormwater Manager went through the requirement pointing out what was required. He then presented a revised draft SWMP going through each recommended BMP and other requirements. The committee had a few questions but ended

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 Hawkins County 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 County will change Resolutions, 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 milestones 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. BMPs for each of the minimum control measures described in the permit

Section II. Measurable Goals for each above BMP.

Section III. Responsible Person

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

- A. **Public Education and Outreach on Stormwater Impacts:** The web site of County and the TNSA education 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. Additionally, we will train those identified county employees whose routine duties may involve activities which may impact water quality: 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 requirement (NPR).	Review annually/current y/n
2-5	Review, change if needed	Review annually/current y/n

BMP 2A TNSA Education Program: The County will participate in the TNSA Education Program.		
Year	Event	Measurable goal/how measured
1-5	Continue to participate	Participate/yes, no

BMP 3A Public Events. Conduct public events such as educational table at local festivals include brochures or fact sheets on the web site—all of above on permit specified issues. One event may include multi target audiences and issues.		
Year	Event	Measurable goal/how measured
1	Identify ed products, budget, request funds	Funds requested/yes, no
2	Obtain funds & ed products, try to do 1st event	Funds received/yes, no
3-5	Participate in at least 2 events during the 5 year permit period	Event occurred/yes, no

BMP 4A Update Public Involvement & Education Plan (PIE). The PIE will be updated to be consistent with the NPR and will be reviewed annually, The public will be given the opportunity to participate in major changes.		
Year	Event	Measurable goal//how

		measured
1	Update to NPR; thereafter, keep up to date	Current/Yes, no
2-5	Keep up to date	Ditto

BMP 5A Library display. Educational information will be placed in the library at Mount Carmel.		
Year	Event	Measurable goal/how measured
1	Identify ed product, budget, request funds	Fund requested/yes, no
2	Obtain funds & ed products, begin display, determine number taken	Number taken/taken=success, no=unsuccessful
3-5	Continue displays	Ditto

- 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 public announcements or information are announced and on the County web site when applicable.		
Year	Event	Measurable goal/how measured
1	Add the SWMP to the web site	On web site/yes, no
2	Develop procedure for public announcements of new developments/redevelopments and other applicable SW info in UA	Proc developed/yes, no
3-5	Review at least annually, update 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 County will update the Resolution, SOPs, forms and other items necessary to fully comply with NPR as well as maintaining records of complaints and the follow-up to same, and maintaining the storm system map. BMPs are:

BMP 1C Update Resolution 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.		
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 County will update the Resolution, 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 Resolution and Procedures: The web site will contain information on new projects inviting the public to participate. Resolution, SOPs, forms 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 NLT 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.		
Yea	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. Maintain a log of all construction site type complaints. Include who, when, and where, and how investigated and results.		
Year	Event	Measurable goal/how measured
1	Update log to comply with NPR	Reviewed/yes, no
2-5	Review annually, update if needed	DITTO

- E. **Post-Construction/Permanent Stormwater Management in New Development and Redevelopment:** The County 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 Resolution and Procedures. Existing Resolution, SOPs, forms and other data will be updated to comply with new permit requirements NLT 8-31-24.		
Year	Event	Measurable goal/how measured
1	Determine requirement, cost and develop budget	Budgeted/yes, no
2	Receive funds, update resolution and procedures	Updated/yes, no
3-5	Review annually, Update if needed	Reviewed/yes, no

BMP 2E. Maintain an Inventory of Permanent Stormwater Control Measures. Update the current list to contain all of the information required by NPR.		
Year	Event	Measurable goal/how measured
1	Determine changes needed and change annotating existing to show they are grandfathered.	Update/yes, no
2-5.	Add new SCM as constructed, keep up to date	Updated/yes, no

BMP 3E. Develop and keep current procedures to track maintenance of Permanent SCM.		
Year	Event	Measurable goal/how measured
1-2	Determine changes needed, begin implementation	Changes determined/yes, no
3	Finish implementation, keep current	Changes made/yes, no
4-5	Keep procedures current	Current/yes, no

F. Pollution Prevention/Good Housekeeping: The County will update the Operation and Maintenance Plan as needed to comply with new permit requirements and ensure identified categories of employees are properly trained. BMPs are:

BMP 1F. Update Operations and Maintenance (O&M) Plan. The O&M Plan will be updated to comply with NPR for the unincorporated UA.		
Year	Event	Measurable goal/How measured.
1	Update the O&M Plan to comply with NPR	Updated/yes, no
2-5	Review annually, update if needed	Reviewed/yes, no

BMP 2F. Employee Training. Identified employees and new hires will be trained as specified in the new permit.		
Year	Event	Measurable goal/how measured
1	Identify employees and begin training including new hires	Identified/yes, no
2-5	Required employees trained	Trained/yes, no

SECTION IV

The person responsible for implementing the SWMP:

The Stormwater Manager, at this writing: Vince Pishner

SECTION IV

Specific Elements Detailed in Each Part of the Permit

A. MONITORING PROGRAM

The permit requires monitoring of discharges to waterbodies with unavailable parameters or exceptional Tennessee waters. There are no exceptional Tennessee waters in the Urbanized Areas (UA); however, if any are designated in the future they will be monitored as specified in the MS4 permit. There are three streams which pass through portions of the UA with unavailable parameters due to excessive levels of e-coli. They are: Smith Creek, Alexander Creek and Hord Creek. Each will be sampled at least once during the period and at least at every 5 year interval. They will each also be non-analytically sampled on the 5 year cycle. Records of both the direct samples and non-analytical samples will be maintained in a folder which will be available for inspection.

There are at least three other streams outside the UA into which drainage from the UA flows. These will not be sampled.

B. ENFORCEMENT PROGRAM

The Enforcement Response Plan will be revised as needed to fully comply with NPR. These changes will be fully implemented at the same time as Construction Site Changes.

C. LEGAL AUTHORITY

The entire stormwater program will be consistent with the MS4 permit and reviewed by an attorney as specified in the permit to ensure it complies with NPR.

**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:

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.

ILLICITS FOUND OR REPORTED:

Within 7 workdays, 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 monthly until resolved. Document action taken, corrective action, and civil penalties, if any. Make a report to include but not be limited to the incident, finding, corrective action and penalties. Maintain the report in a file.

VINCE PISHNER
Stormwater Manager

Citizen Advisory Committee Concurred: January 26, 2023