



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 Clarksville		MS4 Permit Number: TN075205
Contact Person: Eric Salmon		Email Address: eric.salmon@cityofclarksville.com
Telephone: (931) 645-7464		MS4 Program Web Address: https://tn-clarksville.civicplus.com/191/Stormwater
Mailing Address: 199 10th St.		
City: Clarksville	State: TN	ZIP code: 37040

What is the current population of your MS4? 166,722 Census.gov population April 1, 2020

What is the reporting period for this annual report? July1 2020 to June 30 2021

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: _____. 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: Sediment from construction activities, Habitat Alterations and Nutrient Discharges from MS4. Yes No
- C. Do you have a webpage dedicated to your stormwater program? If yes, provide a link/URL: <https://tn-clarksville.civicplus.com/191/Stormwater> Yes No
- D. Summarize how you advertise and publicize your public education, outreach, involvement and participation opportunities: City of Clarksville events calendar, Leaf Chronicle Newspaper, online community event calendars, Facebook page and website.

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

- E. Summarize the public education, outreach, involvement and participation activities you completed during this reporting period: We are working with Cumberland River Compact and Clarksville-Montgomery County School System to set up an environmental education program. We also worked with the City of Clarksville Parks & Rec Dept. and Tennessee Environmental Council for Tree Day. Adopt A Street program has 86 streets adopted. The CSD has done 58 pick ups that total trash bags picked up was 103. Some adopters have been taking care of their trash bags themselves so the total trash bags are 103+.
- 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: For the Tree Day, trees were given out to citizens and donated to the City of Clarksville Parks & Rec Dept. The Cumberland River Compact program did four sessions, one each for K-2, 3-5, 6-8, and 9-12. There were 51 teachers that attend the training. The feedback about the program was great and we are going to try to expand the partnership with Cumberland River compact and Clarksville-Montgomery County School System.

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? 1822
- 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: Dry weather screening performed annually on a portion of outfalls. Yes No
- F. How many illicit discharge related complaints were received this reporting period? 23
- G. How many illicit discharge investigations were performed this reporting period? 23
- H. Of those investigations performed, how many resulted in valid illicit discharges that were addressed and/or eliminated? 16

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

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

- 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? 96
- F. How many active priority and non-priority construction sites were inspected this reporting period? 96
- G. How many construction related complaints were received this reporting period? 18

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

Permanent water quality riparian buffers? If yes, specify requirements: New land disturbing activities along, adjacent to, or near streams shall establish, protect, and maintain a perpetual water quality buffer as described in Chapter 10. The buffer shall be measured horizontally from the top of bank. Top of bank shall mean the highest elevation of land which confines to their channel waters flowing in a stream. Stream buffers shall have two zones as follows: Zone 1(Construction) will begin at the top of bank and extend horizontally and perpendicular to the stream for an average of 30 feet but no less than 15 feet, unless the stream is impaired or an Exceptional Tennessee Waters the buffer should be 60 feet average with a minimum of 30 feet. It will consist of trees and deep-rooted vegetation and shall remain undisturbed except for uses provided in Section 5.5. Zone 2 (Post-Construction) Streams or other waters with drainage areas less than 1 square mile will require buffer widths of 30 feet minimum. Streams or other waters with drainage areas greater than 1 square mile will require buffer widths of 60 feet minimum. The 60-foot criterion for the width of the buffer zone can be established on an average width basis at a project, as long as the minimum width of the buffer zone is more than 30 feet at any measured location. Grading and re-vegetating in Zone 2 is allowed provided that the health of Zone 1 is not compromised. Other allowable activities and uses are provided in Section 5.5.

- Yes 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.)? Projects disturbing 10,000 square feet or more; grading associated with maintenance, landscaping, excavation or placement of fill, disturbing more than 100 cubic feet of soil; hot spots.
- D. How many development and redevelopment project plans were reviewed for this reporting period? 100
- E. How many development and redevelopment project plans were approved? 96
- 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

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

- 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. None
- Changes to the program as required by the division to satisfy permit requirements. Working on the findings that came from the audit in the Fall of 2020 to satisfy the permit requirements.
- Information (e.g. additional acreage, outfalls, BMPs) on newly annexed areas and any resulting updates to your program. None
- 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. Based on the Audit report from the Fall 2020, we are working on implementing the changes that the report suggested. Yes No

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>36</u>	# _____	# <u>23</u>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Written notices	# _____	# _____	# _____	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Citations with administrative penalties	# _____	# _____	# _____	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Stop work orders	# _____	# _____	# _____	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Withholding of plan approvals or other authorizations	# _____	# _____	# _____	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Additional Measures	# _____	# _____	# _____	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?
Mud/sediment in the street, EPSC measures absent or EPSC measures not maintained.

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. Barge Design Solutions, Inc. (BARGE) was retained by the City of Clarksville Street Department to perform biological monitoring in the City's jurisdiction area. Under the National Pollutant Discharge Elimination System (NPDES) permit requirements of the Tennessee Department of Environment and Conservation (TDEC), biological assessments must be performed to determine the current condition of the streams located within the jurisdictional boundaries of the city in which the permitted facility serves. Biological monitoring is required at selected monitoring sites currently listed as impaired.
- B. Summarize any non-analytical monitoring activities (e.g., planning, collection, evaluation of results) performed during this reporting period. None, but the City of Clarksville Street Department did perform visual stream assessment in the City's jurisdiction area over July and August 2021. Visual stream assessment is required on the 303d listed streams within the City's jurisdiction area.
- 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.”

Joe Pitts, Mayor
City of Clarksville

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