



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 Union City		MS4 Permit Number: TNS075558
Contact Person: Kevin Harris		Email Address: stormwater@unioncity.gov or waterforeman@unioncity.gov
Telephone: (731) 885-9601		MS4 Program Web Address: http://www.unioncitytn.gov/stormwater.html
Mailing Address: 315 N 5 <sup>th</sup> Street		
City: Union City	State: TN	ZIP code: 38261

What is the current population of your MS4? 10,895

What is the reporting period for this annual report? July 1 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: \_\_\_\_\_.  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 City hands out educational pamphlets at public events and meetings and also give out pamphlets during hotspot inspections. We run newspaper ads throughout the year and also perform public education through social media to help prevent pollution of our waterways.  Yes  No
- C. Do you have a webpage dedicated to your stormwater program? If yes, provide a link/URL: http://www.unioncitytn.gov/stormwater.html and City of Union City Stormwater on Facebook.  Yes  No

- D. Summarize how you advertise and publicize your public education, outreach, involvement and participation opportunities:

The City places ads in the local newspaper, we print stormwater tips on water bills twice a year, we place pamphlets in public areas throughout the city, we host the 250K Tree Day and give out pamphlets, we perform employee training, we hand out pamphlets during Hotspot inspections, we participate in the TAB program, we use our Stormwater website and our Stormwater Facebook page, and we reach out during public events and meetings.

- E. Summarize the public education, outreach, involvement and participation activities you completed during this reporting period:

The City of Union City continues to participate in various public outreach programs including:

A City wide cleanup that runs for 15 days in the month of May in which the City provides dumpster in different locations throughout the city.

Participated in the 250K Tree Day in which we distributed stormwater pamphlets and gave out 1142 trees of various species.

The City participated in the TAB program.

Stormwater inlets were labeled at various areas throughout the city limits.

Pamphlets were handed out during hotspot inspections.

We perform employee training for all City employees according to the permit and new City employees within 6 months of hire date.

Educational brochures were sent to local industries, restaurants, and businesses.

Quarterly newspaper ads were run in the local newspaper.

Provided contractors and engineers with a Stormwater feedback form.

Stormwater tips are printed on water bills twice a year.

Pamphlets were distributed to the Obion County Library and City of Union City city hall.

Concrete washout pamphlets were handed out to contractors.

The City was scheduled to host a booth during the Cornfest in Union City as in past years but the event was rained out.

Displays signs in parks reminding citizens to clean up after their pets.

- 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: We have started to see a growing number of citizens getting involved by reporting illicit discharges. Overall, contractors have been more acceptable to our Stormwater Program than in the past and I personally have taken a different approach when dealing with contractors and hotspot inspections/issues by talking to contractors and business owners during the inspections and answering any questions that they might have. I believe this approach has helped both contractors and business owners understand why stormwater pollution and runoff control is very important. Also since moving the Stormwater Dept. to Public Works it gives me a chance to not only oversee all the worksites that the City is involved in but also it gives me the opportunity to educate employees on a daily basis as different scenarios arise.

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? 335
- 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: The City performs inspections on hot spots, land disturbances, new home builds, Public Works work sites, and TDEC regulated land disturbance sites over 1 acre. We perform these inspections on at least a weekly basis whether the site is a priority or non-priority site. If any issue is found it is documented and resolved as quickly as possible with follow ups on a daily basis. The City Police Department has been educated on illegal stormwater discharges and are on patrol 24hrs. a day. Public Works Department works daily cleaning curb and gutters with our street sweeper, along with cleaning stormdrain inlets on a regular basis. The Public Works Dept. also has a Vac-Tron that is used to clean stormdrain inlets, catch basins, and debris cleanup at the department's job sites. The Parks and Rec. Department works daily to maintain the City's Parks. All Public Works employees have been trained to look for illicit discharges and unauthorized construction work.  Yes  No
- F. How many illicit discharge related complaints were received this reporting period? 14
- G. How many illicit discharge investigations were performed this reporting period? 14
- H. Of those investigations performed, how many resulted in valid illicit discharges that were addressed and/or eliminated? 14

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? 14
- F. How many active priority and non-priority construction sites were inspected this reporting period? 34
- G. How many construction related complaints were received this reporting period? 2

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: Construction sites require a minimum thirty (30) feet buffer zone. The thirty (30) feet criteria for the width of the buffer zone can be established on an average width basis as long as the minimum width is fifteen (15) feet. Construction being performed around waters with unavailable parameters or exceptional waters the width of the buffer zone shall be a minimum of sixty (60) feet.  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.)? All land disturbances no matter the acreage including but not limited to new home builds, new business builds, demolitions, factory construction, both new and redevelopment projects are required to obtain a City permit. All land disturbances over an acre are required to submit a SWPPP and plans to the both the State of Tennessee and the City of Union City for approval. We treat under an acre projects the same as larger projects as far as stormwater control and illicit discharges.
- D. How many development and redevelopment project plans were reviewed for this reporting period? 7
- E. How many development and redevelopment project plans were approved? 7
- 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
- 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

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- 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. In the upcoming year we will be developing a new inspection report for under an acre project sites so they are easier to track and document.  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>61</u>	# <u>0</u>	# <u>8</u>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Written notices	# <u>8</u>	# <u>0</u>	# <u>9</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>2</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: _____	

- 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?  
Construction sites installing and maintaining EPSC measures.

10. Monitoring, Recordkeeping and reporting (Section 5)

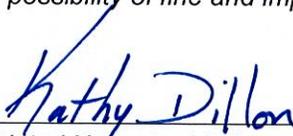
- A. Summarize any analytical monitoring activities (e.g., planning, collection, evaluation of results) performed during this reporting period. The City has implemented our Stormwater Utility Budget this fiscal year and we will be performing analytical monitoring starting the 2019-2020 fiscal year. The City's Waste Water Treatment plant catches samples at each receiving stream and performs a dissolved oxygen, PH, and E-coli test.
- B. Summarize any non-analytical monitoring activities (e.g., planning, collection, evaluation of results) performed during this reporting period. City employees perform visual stream and outfall inspections. I visually inspect streams weekly and after large rains to catch any illicit discharges or stormwater runoff from current construction sites. Complaints are investigated as soon as we receive them, corrective actions taken, and follow up inspections performed. Construction site inspections on priority sites were made per the permit monthly with soft inspections performed on a weekly basis to keep the sites from getting out of compliance between monthly inspections. Starting in April 2019 inspections on all under an acre land disturbances are inspected weekly.
- C. If applicable, are monitoring records for activities performed during this reporting period submitted with this report.  Yes  No

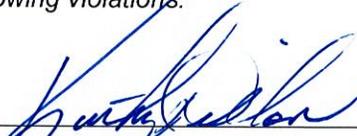
11. Certification

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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