



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

**Phase II Stormwater Permit Notice of Intent (NOI)**  
**Phase II Municipal Separate Storm Sewer Systems (MS4)**

**PURPOSE**

The purpose of this Notice of Intent (NOI) is for a Tennessee city, county, utility district, university or military base to submit the information necessary to obtain coverage under an NPDES permit to discharge stormwater runoff from a Phase II municipal separate storm sewer system.

**INSTRUCTIONS**

You must provide the following information to the Division of Water Resources as application material. You may either submit a hard copy of the signed NOI as described in sub-part 2.2.1 of the MS4 Permit, signed in accordance with the signatory requirements of sub-part 6.7 of the permit, and a copy of the NOI, to the address shown in sub-part 1.2 of the permit for the EFO responsible for the county where the facility is located; or you may submit by e-mail, the completed NOI and attachments (such as map and city ordinances) to [water.permits@tn.gov](mailto:water.permits@tn.gov).

After completing the questions in each section, list the Best Management Practices (BMPs) that you will implement in each program. Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

After completing the BMP's in each section provide the administrative information to complete those BMP's as explained here:

Primary Contact and Position/Title	The person in your organization serving as the primary contact.
Other Department and Roles	Other departments within your organization involved in the project and how their role is identified.
Other Government Entity and Roles	Identification of other government entities responsible for implementing one or more of the BMP's. Include a copy of the contract or proposed agreement with execution schedule.
Other Institutions and Roles	Identification of partnerships with another MS4 operator or institution (e.g., Chamber of Commerce, environmental interest organizations, civic groups) to achieve the BMP's.
Target Groups (if applicable)	Specific kinds of groups that will be targeted, such as service industries (i.e., carpet cleaning), civic groups, schools, and church groups, etc.

**PART I - ADMINISTRATIVE INFORMATION**

Name of Phase II MS4 city, county, stormwater utility district or public institution: City of Union City, Tennessee

Include a latitude and longitude of a representative location within your boundaries for mapping purposes.

Latitude (dd.dddd): 36.4231 Longitude (dd.dddd): -89.0564

Terry Hailey Mayor  
 Responsible Elected Official or Officer Title

P.O. Box 9 Union City TN 38281  
 Street Address City State Zip Code

**PROGRAM CONTACT**

Christina Bannister

Name

stormwater@unioncitytn.org

Email Address

731-446-5840

Phone Number

**TECHNICAL CONTACT**

Christina Bannister

Name

stormwater@unioncitytn.org

Email Address

731-446-5840

Phone Number

Attach an organizational chart that shows the different departments involved in stormwater management.

**PART II - DESCRIPTION OF STORM SEWER SYSTEM**

**ITEM A - AREA SERVED (IN SQUARE MILES)**

For a city, town, university, or utility district university or military base:

Provide jurisdiction area within current boundaries	<u>12.09</u>
Provide additional area of urban growth boundary	<u>44</u>

For a county:

Provide total area:	_____
Provide area that is unincorporated	_____
Provide unincorporated, urbanized area (UA)	_____

Indicate by checking the appropriate box if the permit will be used to regulate non-UA portions of the county:

- No
- Yes, the entire county (unincorporated)
- Yes, the non-UA portions, as follows: \_\_\_\_\_

**ITEM B - STORM DRAINAGE INFRASTRUCTURE**

Give figures for the following features of stormwater drainage infrastructure owned or operated by the local government. For a county government, indicate whether the figures represent the entire county or only the urbanized area. Figures for length and number of culverts and catch basins may be rough estimates.

For counties: Entire county  Urbanized area only

Storm Sewers	<u>40</u> (miles or feet)	Open Ditches	<u>21</u> (miles or feet)
Culverts	<u>270</u>	Catch Basins	<u>2780</u>
Water Quality Treatment Ponds	<u>0</u>		

**ITEM C - MAPS**

Include a map or maps depicting the following information. A single map may be submitted, as long as the information is legible. If you are not able to provide all the information mark the applicable check box and attach an explanation as to why the information has not been submitted:

- Areas zoned for commercial or industrial activity
- Municipally owned/operated industrial activities
- Municipal or County Wastewater Treatment Plants
- Municipal Vehicle Fleet Maintenance Centers
- Municipal Power Plants
- Municipal Airports
- Municipal Landfills
- Military Installations
- State vocational, technical, college or universities
- Federal vocational, technical, college or universities
- City Roads
- County Roads
- Streams
- Topography or General Drainage Patterns

The information not included in the maps is not applicable to Union City.

**ITEM D - IDENTIFYING STREAMS WITH UNAVAILABLE PARAMETERS or EXCEPTIONAL TENNESSEE WATERS**

Using the GIS mapping tool (<http://www.tn.gov/environment/article/wr-water-resources-data-viewer>) along with the most current 303(d) list (<http://www.tn.gov/environment/article/wr-wq-water-quality-reports-publications>) published on the division's web site, determine whether stormwater from any part of the MS4 discharges into streams with unavailable parameters (previously referred to as impaired streams) for nutrients, pathogens, siltation, or other parameters related to stormwater runoff from urbanized areas or to streams designated as Exceptional Tennessee Waters and list below. For any waterbody with unavailable parameters or Exceptional Tennessee Waters, indicate the waterbody ID#, name of the waterbody and nature of pollution (cause) or Exceptional status.

WATERBODY ID# AND NAME OF WATERBODY	NATURE OF POLLUTANT (CAUSE) OR EXCEPTIONAL
TN08010202419-1000 Hoosier Creek	Loss of biological integrity due to siltation, Physical Substrate Habitat Alterations (Non-Irrigated Crop Production Channelization)
TN080102009-0100 Unnamed Tributary to North Fork Obion River	Discharges from MS4 Area (Stream is Category 5, one or more uses impaired)

If you have additional streams to list, include in a separate attachment.




**PART IV - SIGNATURE OF RESPONSIBLE CORPORATE OFFICER**

This Notice of Intent (NOI) must be signed as follows: For a municipality, state, federal, other public agency, and/or co-permittees by either a principal executive officer or ranking elected official. For purposes of this section, a principal executive officer of a Federal agency includes one of the following:

- I. The chief executive officer of the agency.
- II. A senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., Regional Administrators of EPA).

I certify under penalty of law that this document and all attachments were prepared by me, or under my direction or supervision. The submitted information 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. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury."

 _____ Signature	<u>Mayor, Union City, TN</u> _____ Title/Municipality	<u>2/1/17</u> _____ Date
_____ Signature	_____ Title/Municipality	_____ Date
_____ Signature	_____ Title/Municipality	_____ Date
_____ Signature	_____ Title/Municipality	_____ Date
_____ Signature	_____ Title/Municipality	_____ Date
_____ Signature	_____ Title/Municipality	_____ Date
_____ Signature	_____ Title/Municipality	_____ Date

**PART V - YOUR PROPOSED STORMWATER QUALITY MANAGEMENT PROGRAM**

This NOI requires you to provide a brief description of your current and proposed activities as well as your BMPs for a stormwater management program. The following sections correspond to the six minimum control measures for a Phase II stormwater management program. If another MS4 will be responsible for implementing any or all portions of any or all following six minimum measures, then attach either the interlocutory agreement or the proposed agreement and schedule for adoption. You must still complete this NOI by answering the relevant questions for the six following measures.

For purposes of this NOI, the Public Education and Outreach and Public Participation and Involvement minimum measures have been combined.

**SECTION 1 - PUBLIC EDUCATION AND OUTREACH AND PUBLIC INVOLVEMENT/PARTICIPATION**

**A. Current Activities:**

The following is a set of questions on your current Public Education and Outreach and Public Involvement/Participation. These questions are intended to highlight minimum program requirements under the MS4 permit. Each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

1. Does the municipality currently distribute educational materials on the topics of stormwater quality, instream water quality, pollution impacts, pollution prevention, etc.? If yes, briefly describe the materials, including media used (e.g., written brochures, public service announcements, etc.); the topic(s) covered, intended target audience(s), and the distribution method: Stormwater information is available at City Hall and through the City's website. Educational materials are handed out at a local event. These materials include brochures and worksheets that target businesses, homeowners, children, and contractors. The City participates in the Non-Commercial Sustaining Announcements (NCSAs) through TNSA and TAB.

Yes  No

2. Does the municipality currently conduct or participate in public outreach activities focusing on the topics of stormwater quality, stream water quality, pollution impacts, pollution prevention, etc.? If yes, briefly describe the outreach activities, topic(s) covered, intended target audience(s), and the frequency of activities: The City is working with the local NWTN Boys & Girls Club to perform annual clean projects. The City is active in the TNSA NW Region.

Yes  No

3. Does the current municipal stormwater management program comply with Local, State and Federal public notice requirements? If yes, describe how the public is notified: The City complies with all public notice requirements with notifications via TV, radio, website and newspaper.

Yes  No

**B. Proposed Activities:**

1. List the BMPs that you will implement in the areas of Public Education and Outreach and Public Participation and Involvement. These should be based on a set of priorities that you have identified in the areas of Public Education and Outreach and Public Participation and Involvement. Provide a short descriptive name to the BMP in the left column. In the right column, more fully describe the BMP.

For Public Participation and Involvement BMPs, you may not desire to dictate the ways in which the public participates or is involved in the stormwater quality management program; in this case, your proposed program should provide a forum and/or a structure which guides and encourages the public in participation. On the other hand, there may be specific ways you do want the public to be involved, based on your program needs. For instance, you may want stream watch groups to be organized. In both cases, your proposed program should describe how you will accomplish this, along with a time schedule.

PROPOSED BEST MANAGEMENT PRACTICES FOR PUBLIC EDUCATION AND PUBLIC PARTICIPATION		
BMP	Name	DESCRIPTION
1A.	City Stormwater	The Stormwater Management webpage shall be kept updated with educational

	Web Page	materials, forms, plans, ordinances, and storm water management contact information.
1B.	Stormwater Educational Material	The City will annually mail relevant educational materials to all owners of hot spots. The City will develop and distribute educational materials to the community and provide public awareness concerning stormwater pollution and prevention through newspaper, radio, and tv.
1C.	Clean Up Day	The City will partner with the local Boys & Girls Club to sponsor a community clean-up day.
1D.	Public Media Notifications	Newspaper, radio and TV broadcasts will be used to spread awareness of stormwater pollution, prevention, and its impacts.

If you have additional BMPs to list, include in a separate attachment.

2. What specific groups will be targeted (e.g., service industries such as carpet cleaning, lawn care, civic groups, schools, church groups) if applicable: Citizens of Union City, city employees, homeowners, contractors, developers, civic groups, and businesses (specifically lawn care, automotive maintenance, and food service).

**C. Measurable Goals and Implementation Milestones:**

Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

**D. Administrative Information:**

ADMINISTRATIVE INFORMATION FOR PUBLIC EDUCATION AND PUBLIC PARTICIPATION	
PRIMARY CONTACT	POSITION OR TITLE
Christina Bannister	Stormwater Program Manager

Identify other Department(s) that will be involved and their role.

OTHER DEPARTMENT(S)	ROLE
N/A	

Identify if you will partner with another MS4 Operator, or with another institution (e.g. Chamber of Commerce, Environmental interest organizations, civic groups) in order to carry out the chosen BMPs.

ENTITY	BMP
NRCS, EPA, TNSA	Stormwater Educational Media, City Stormwater Web Page
Boys & Girls Club	Community Clean-Up and Involvement, Stormwater Educational Media
Obion County Library	Stormwater Educational Media, Community Clean-Up and Involvement

Will another governmental entity be responsible for implementing one or more chosen BMPs? If so, identify the entity and which BMP(s) it will implement. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.

ENTITY	BMP
Not at this time.	

**SECTION 2 - ILLICIT DISCHARGE DETECTION AND ELIMINATION**

**A. Current Activities**

The following is a set of questions on your current Illicit Discharge Detection and Elimination Program. These questions are intended to highlight minimum program requirements under the MS4 permit. For MS4s who have not been previously covered under an MS4 permit, each element not currently performed must be implemented by the dates identified in Sub-part 4.1.1 of the permit. Thus, each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

1. Does the municipality currently have a storm sewer system map that shows the location of system outfalls where the municipal storm sewer system discharges into receiving waters or conveyances owned or operated by another MS4? The map must also show: the names and location of waters that receive discharges from those outfalls; 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

2. Does the municipality currently have an ordinance or regulatory mechanism that prohibits unauthorized non-stormwater discharges into the storm sewer system? If yes, attach a copy and give page and section number(s). If No, proceed to the next section (inspections and enforcement).

Yes  No  Page Number 29 Paragraph Number 8.2

3. Does the ordinance or regulatory mechanism clearly define non-stormwater discharges, either through a written description of a non-stormwater discharge or through a listing of authorized or unauthorized non-stormwater discharges?

Yes  No

4. Does the ordinance or regulatory mechanism allow right-of-entry on private property for inspection of suspected discharges?

Yes  No

5. Does the ordinance or regulatory mechanism prohibit dumping?

Yes  No

6. Does the ordinance or regulatory mechanism give the MS4 owner/operator the authority to eliminate unauthorized non-stormwater discharges in the event of violations? If yes, note page number and paragraph number.

Yes  No  Page Number 32-33 Paragraph Number 9.2e2

7. Does the ordinance or regulatory mechanism define penalties for violations? If yes, note maximum penalty, page number and paragraph number.

Yes  No  Maximum Penalty \$5,000 Page Number 33-34 Paragraph Number 10.2

8. Does the municipality presently have personnel and procedures in place to detect, identify and eliminate non-stormwater discharges? If yes, describe and indicate percentage of system inspected: The Public Works department performed a visual inspection for each outfall within the City. The Planning and Codes department responds to reports of suspected illicit discharges. Approximately 95% of the system has been inspected.

Yes  No

9. Does the municipality presently have procedures and personnel in place for enforcement of violations of the illicit discharge ordinance? If yes, describe: The City Council acts as the Appeals Board. Any appeals are documented, sent to the board, and a hearing is held. If further action is required, it is taken to the Chancery Court.

Yes  No

10. Describe how enforcement actions are documented: Proper documentation is addressed in Section 2 of the Addendum. Any enforcements actions are kept in either the violations file or in the appropriate construction file.

11. Has the municipality defined "hot spots" for non-stormwater discharge screening and inspection purposes? If yes, describe and provide a map of illicit discharge screening hot spots: The City has identified hot spots, but the map is not complete at this time. The list of hot spots is attached and mapping goals are further addressed in Section 2 of the Addendum.

Yes  No



12. Does the municipality presently have procedures in place to receive and consider information and complaints about non-stormwater discharges that are submitted by the public? If yes, provide brief description: responsible departments, personnel, steps followed: A complaint form is filled listing the name, location, date, and nature of the complaint. This is sent to the Stormwater Program Manager, an inspection is performed, and the complaint is recorded in an excel spreadsheet for tracking purposes.

Yes  No

**B. Proposed Activities:**

1. List the BMPs that you will implement in the area of Illicit Discharge Detection and Elimination. These should be based on a set of priorities that you have identified in the area of Illicit Discharge Detection and Elimination. Provide a short descriptive name to the BMP in the left column and more description in the right column.

PROPOSED BEST MANAGEMENT PRACTICES FOR ILLICIT DISCHARGE DETECTION AND ELIMINATION		
BMP	Name	DESCRIPTION
2A.	Active Inspections	Develop IDDE Plan and ERP. Perform inspections at significant points of storm sewer system to detect and eliminate illicit discharges.
2B.	Awareness and Education on Illicit Discharges	Continue to educate the public and ask them to notify the MS4 if they see or suspect an illicit discharge.
2C.	Stormwater Input/Outfall Map	Update storm sewer system map.

If you have additional BMPs to list, include in a separate attachment.

2. What specific groups will be targeted, if applicable? Union City employees, residents, and businesses. Specifically, car wash, auto detailing and servicing, gas station, and restaurant businesses.

**C. Measurable Goals and Implementation Milestones**

Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

**D. Administrative Information**

ADMINISTRATIVE INFORMATION FOR ILLICIT DISCHARGE DETECTION AND ELIMINATION	
PRIMARY CONTACT	POSITION OR TITLE
Christina Bannister	Stormwater Program Manager

Identify other Department(s) that will be involved and their role.

OTHER DEPARTMENT(S)	ROLE
Planning & Code Enforcement	Reports any suspected illicit discharges while performing various inspections on commercial and residential sites.
Public Works Department	Assists in mapping outfalls and inspections.

Identify if you will partner with another MS4 Operator, or with another institution (e.g. Chamber of Commerce, Environmental interest organizations, civic groups) in order to carry out the chosen BMPs.

ENTITY	BMP
NRCS, EPA, TNSA	Awareness and Education on Illicit Discharges (brochures/pamphlets, web page)

Will another governmental entity be responsible for implementing one or more chosen BMPs? If so, identify the entity and which BMP(s) it will implement. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.

ENTITY	BMP
Not at this time.	

**SECTION 3 - CONSTRUCTION SITE STORMWATER RUNOFF PROGRAM**

**A. Current Activities**

The following is a set of questions on your current Construction Site Stormwater Runoff Program. These questions are intended to highlight minimum program requirements under the MS4 permit. For MS4s who have not been previously covered under an MS4 permit, each element not currently performed must be implemented by the dates identified in Sub-part 4.1.1 of the permit. Thus, each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

1. Do the current ordinances/regulations for the municipal stormwater management program comply with Local, State and Federal public notice requirements? If yes, describe how the public is notified: The Public is notified by articles in the newspaper, public access channel, website, and pre-construction meetings.

Yes  No

2. Do you currently have an erosion prevention and sediment control - or similar - ordinance or regulatory mechanism? If yes, include a copy and reference the paragraph number(s). If No, proceed to the next set of questions below about construction site plans review.

Yes  No  Page Number 20-23 Paragraph Number 00

3. Does the ordinance or regulatory mechanism require that site operators implement erosion prevention, sediment control, and other construction waste controls for land disturbance activities?

Yes  No

4. Does the ordinance/regulatory mechanism require that controls be implemented for any land disturbances greater than or equal to one acre, or less than one acre if part of a large common plan of development or sale that would disturb one acre or more? If yes, note the page number and paragraph number where this is defined.

Yes  No  Page Number 8 Paragraph Number 3.1

5. Does the ordinance or regulatory mechanism contain or reference technical standards for erosion and sediment control? If yes, note the page number and paragraph number where this is defined.

Yes  No  Page Number 16 Paragraph Number 4.4c

6. Do those technical standards meet or exceed the current effective Tennessee Construction General Permit (TNR100000) requirements for design storm and special conditions for waterbodies with unavailable parameters or Exceptional Tennessee Waters?

Yes  No

7. Do those technical standards require that construction activities maintain temporary water quality riparian buffers during construction?

Yes  No

8. Does the municipality presently have in place a technical review process (i.e. engineering department, planning department, zoning board) that evaluates new development and redevelopment construction for construction site runoff?

Yes  No

9. Does the technical review process require an erosion prevention and sediment control plan with appropriate BMPs?

Yes  No

10. Does the review process include a requirement for pre-construction meeting between the municipality and site developer, for priority construction sites?

Yes  No

11. If there is a review process, provide a brief narrative or a flow chart of the process, describing the process steps, responsible personnel, and criteria used for evaluation of information or plans that are submitted: attached

12. Does the municipality presently have procedures in place for receipt and consideration of information and complaints submitted by the public?

Yes  No

If yes, provide a brief narrative of the receipt process and procedures, describing process steps, responsible departments, personnel (by title). The City receives complaints and fills out a complaint form. Construction site stormwater complaints are directed to the Stormwater Coordinators who will coordinate inspections. Any violations or issues will be further handled by the Stormwater Coordinators or TDEC.

13. Does the municipality presently have personnel and procedures in place for construction site runoff inspection?

Yes  No

14. Does the program provide for pre-construction meeting and monthly inspection of priority construction activities?

Yes  No

15. Does the municipality presently have procedures and personnel in place for enforcement to the maximum extend for violations of construction site requirements?

Yes  No

16. Does the municipality use a Stop Work or similar order to enforce compliance with construction site policies and requirements?

Yes  No

17. How are enforcement actions documented? All enforcement actions are documented on paper and filed in the corresponding project file.

18. Have MS4 inspectors who conduct inspections of construction sites received certification under the Tennessee Fundamentals of Erosion Prevention and Sediment Control, Level 1, and construction site plan reviewers a certificate of completion from the Tennessee Erosion Prevention and Sediment Control Design Course, Level 2?

Yes  No

**B. Proposed Activities:**

1. List the BMPs that you will implement in the area of Construction Site Runoff Program. These should be based on a set of priorities that you have identified in the area of Construction Site Runoff Program. Provide a short descriptive name to the BMP in the left column and more description in the right column.

PROPOSED BEST MANAGEMENT PRACTICES FOR CONSTRUCTION SITE RUNOFF PROGRAM		
BMP	Name	DESCRIPTION
3A.	Stormwater Management Ordinance	Update and maintain stormwater ordinance to comply with CGP.
3B.	EPSC BMP Manual	Adopt the most current issue of the State of Tennessee Erosion Prevention and Sediment Control Handbook as the standard for the City of Paris.
3C.	Site Plan Review Process	Maintain Site Plan Review Process for new construction and land disturbance activities. Hold stakeholder's meeting and implement pre-construction meetings.
3D.	Inspections	Maintain inspection program and update as needed.

If you have additional BMPs to list, include in a separate attachment.

2. Describe specific groups that will be targeted, if applicable: Contractors, developers, engineers, Planning and Codes department, and others responsible for construction or land disturbing activities.

**C. Measurable Goals and Implementation Milestones**

Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

**D. Administrative Information**

ADMINISTRATIVE INFORMATION FOR CONSTRUCTION SITE RUNOFF PROGRAM	
PRIMARY CONTACT	POSITION OR TITLE
Christina Bannister	Stormwater Program Manager

Identify other Department(s) that will be involved and their role.

OTHER DEPARTMENT(S)	ROLE
Public Works	Perform necessary maintenance due to noncompliance.

Identify if you will partner with another MS4 Operator, or with another institution (e.g. Chamber of Commerce, Environmental interest organizations, civic groups) in order to carry out the chosen BMPs.

ENTITY	BMP
Not at this time.	

Will another governmental entity be responsible for implementing one or more chosen BMPs? If so, identify the entity and which BMP(s) it will implement. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.

ENTITY	BMP
Not at this time.	

**SECTION 4 - PERMANENT STORMWATER MANAGEMENT AT NEW DEVELOPMENT AND REDEVELOPMENT**

**A. Current Activities:**

The following is a set of questions on your current Permanent Stormwater Management in New Development and Redevelopment Program. These questions are intended to highlight minimum program requirements under the MS4 permit. For MS4s who have not been previously covered under an MS4 permit, each element not currently performed must be implemented by the dates identified in Sub-part 4.1.1 of the permit. Thus, each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

1. Does the municipality currently have in place mechanisms or strategies to address permanent stormwater runoff management from new development or redevelopment projects that result in land disturbance of one acre or more? For example, land use planning requirements, zoning directives, site-based pollutant removal controls; stormwater detention or storage; practices that infiltrate stormwater; vegetative practices.

Yes  No

If yes, provide a brief narrative of - and/or references to - the structural and non-structural strategies, describing strategies implemented, Best Management Practices allowed, technical guidance, responsible departments, and personnel (by title): The City currently has an active zoning ordinance and has adopted the most recent version of the TDEC handbook. The City is in the process of adopting a new Stormwater Ordinance. Strategies addressed in Permanent Stormwater Management section of the Addendum.

2. Do you currently have an ordinance or regulatory mechanism that addresses permanent stormwater runoff management from new development and redevelopment projects? If yes, reference the page number and paragraph number. If no, proceed to the next section on permanent stormwater management plans review.

Yes  No

3. Does the ordinance or regulatory mechanism require controls to treat pollutants in stormwater runoff? If yes, note page number and paragraph number.

Yes  No  Page Number 00 Paragraph Number 00

4. Does the ordinance or regulatory mechanism require (explicitly or implicitly) that controls be implemented for any new development or redevelopment projects greater than or equal to one acre, including projects less than one acre that are part of a large common plan of development or sale, that discharge into your small MS4? If yes, note page number and paragraph number.

Yes  No  Page Number 8 Paragraph Number 3.1a

5. Does the ordinance or regulatory mechanism contain or reference technical standards for water quality controls? If yes, note page number and paragraph number.

Yes  No  Page Number 13-14 Paragraph Number 4.1-4.2

6. Does the ordinance or regulatory mechanism clearly define the criteria for submittal -who must submit - of permanent stormwater management design information or plans? If yes, note page number and paragraph number.

Yes  No  Page Number 8 Paragraph Number 3.1a

7. Does the ordinance or regulatory mechanism require approval prior to construction of permanent stormwater management controls? If yes, note page number and paragraph number.

Yes  No  Page Number 00 Paragraph Number 00

8. Does the ordinance or regulatory mechanism require re-submittal of permanent stormwater management design information or plans if site plans change after the initial design has been approved? If yes, note page number and paragraph number.

Yes  No  Page Number 00 Paragraph Number 00

9. Does the ordinance or regulatory mechanism give the MS4 owner/operator the authority to penalize the owner of permanent stormwater management controls for violations? If yes, note page number and paragraph number.

Yes  No  Page Number 00 Paragraph Number 00

10. Does the ordinance or regulatory mechanism require that permanent stormwater management controls have adequate and long-term operation and maintenance? If yes, note page number and paragraph number. If no, describe how the MS4 owner/operator maintains permanent stormwater management controls: At this time we are currently building the foundation to start locating and inspecting permanent BMPs.

Yes  No  Page Number 00 Paragraph Number 00

11. Does the ordinance or regulatory mechanism require establishment and maintenance of water quality riparian buffers in areas of new development and redevelopment?

Yes  No

12. Does the municipality presently have in place a technical review process (i.e. engineering department, planning department, zoning board) that evaluates new development and redevelopment with regard to the impact that permanent stormwater runoff will have on receiving streams?

Yes  No

If Yes, provide a brief narrative or a flow chart of the review process, describing the process steps, responsible personnel (by department, title and contact person), and criteria used for evaluation of information or plans that are submitted: Attached.

**B. Proposed Activities:**

List the BMPs that you will implement in the area of the Permanent Stormwater Management Plans Review. These should be based on a set of priorities that you have identified in the area of the Permanent Stormwater Management Plans Review. Provide a short descriptive name to the BMP in the left column and more description in the right column.

PROPOSED BEST MANAGEMENT PRACTICES FOR PERMANENT STORMWATER PLANS REVIEW		
BMP	Name	DESCRIPTION
4A.	Permanent Stormwater Management	Continue implementing existing program requirements. Research, submit, and implement new Permanent Stormwater Management program, as approved by TDEC.
4B.	Ordinance Enforcement	Review all plans for compliance with City Ordinance concerning stormwater management. Develop revised Ordinance compliant with MS4 permit and CGP.

If you have additional BMPs to list, include in a separate attachment.

Describe the specific groups that will be targeted, if applicable? Businesses, contractors, developers, owners, Planning and Codes, engineers

**C. Measurable Goals and Implementation Milestones:**

Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

**D. Administrative Information:**

ADMINISTRATIVE INFORMATION FOR PERMANENT STORMWATER MANAGEMENT PLANS REVIEW	
PRIMARY CONTACT	POSITION OR TITLE
Christina Bannister	Stormwater Program Manager

Identify other Department(s) that will be involved and their role.

OTHER DEPARTMENT(S)	ROLE
Planning and Codes Enforcement	Receives plans and issues permits.

Identify if you will partner with another MS4 Operator, or with another institution (e.g. Chamber of Commerce, Environmental interest organizations, civic groups) in order to carry out the chosen BMPs.

ENTITY	BMP
Not at this time.	

Will another governmental entity be responsible for implementing one or more chosen BMPs? If so, identify the entity and which BMP(s) it will implement. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.

ENTITY	BMP
Not at this time.	

**SECTION 5 - POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS**

**A. Current Activities:**

The following is a set of questions on your current Pollution Prevention/Good Housekeeping for Municipal Operations Program. These questions are intended to highlight minimum program requirements under the MS4 permit. Each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

1. Does the municipality's current Pollution Prevention/Good Housekeeping program provide annual training for employees responsible for municipal operations at facilities within the jurisdiction of the permittee that handle, generate and/or store materials which constitute a potential pollutant of concern for MS4s? Examples of these materials may include, but are not limited to, lubricants, fuels, sand, gravel, soil, salt, pesticide, fertilizer, garbage, trash, clippings, vehicles, equipment, and other wastes.

Yes  No

2. Are training activities documented? If yes, describe training and method of record-keeping: Presentation is given by MTAS and the City. Pre- and Post- tests are given. Tests and date of training are documented.

Yes  No

3. Has the MS4 owner/operator obtained a Tennessee Multi-Sector General Permit or a no-exposure certification for all qualifying municipal industrial activities? If yes, give permit numbers or attach copies of the No-Exposure Certification form.

Yes  No  Permit Numbers(s) \_\_\_\_\_

4. List municipal operations or facilities that have a potential for contaminating stormwater runoff such as the following: streets, roads, highways, municipal parking lots, maintenance and storage yards, fleet or maintenance shops with outdoor storage areas, salt/sand storage locations, snow disposal areas operated by the MS4, and waste disposal, storage, and transfer stations. If there is more than one facility for a given type of operation; give the number of such facilities. Indicate if an operation and maintenance plan, which includes maintenance activities, schedules and the proper disposal of waste from related structural and non-structural stormwater controls, has been implemented for each facility or operation.

FACILITY OR TYPE OF OPERATION	NUMBER OF FACILITIES	OPERATION AND MAINTENANCE PLAN IMPLEMENTED?
Turf Management	1	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Parks and Recreation	1	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Public Works	1	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Fire Department	2	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Police Department	1	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Wastewater	1	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Water Department	1	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Planning & Codes	1	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Animal Control	1	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
		Yes <input type="checkbox"/> No <input type="checkbox"/>
		Yes <input type="checkbox"/> No <input type="checkbox"/>
		Yes <input type="checkbox"/> No <input type="checkbox"/>
		Yes <input type="checkbox"/> No <input type="checkbox"/>
		Yes <input type="checkbox"/> No <input type="checkbox"/>

**B. Proposed Activities:**

List the BMPs that you will implement in the area of the Pollution Prevention and Good Housekeeping Program. These should be based on a set of priorities that you have identified in the area of the Pollution Prevention and Good Housekeeping Program. Provide a short descriptive name to the BMP in the left column and more description in the right column.

In addition to considering industrial-type operations, you must also consider municipal infrastructure, and related maintenance activities, maintenance schedules and long-term inspection procedures for structural controls and the proper disposal of waste from storm sewers/catch basins.

PROPOSED BEST MANAGEMENT PRACTICES FOR POLLUTION PREVENTION AND HOUSEKEEPING		
BMP	Name	DESCRIPTION
5A.	Conduct Training	Conduct new employee training within 6 months and key personnel training at least once every 5 years to make sure that they understand the SWPPP and reporting requirements.
5B.	Inspections	Conduct annual Housekeeping inspections of Municipal Facilities and operations
5C.	Review O&M Plan Yearly and Update	Review each of the Municipal Operations O&M Plans yearly and see if any improvements need to be made or changes bases based changing operations and update

If you have additional BMPs to list, include in a separate attachment.

Provide specific groups that will be targeted, if applicable: City Employees

**C. Measurable Goals and Implementation Milestones:**

Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

**D. Administrative Information:**

ADMINISTRATIVE INFORMATION FOR POLLUTION PREVENTION AND HOUSEKEEPING	
PRIMARY CONTACT	POSITION OR TITLE
Christina Bannister	Stormwater Program Manager

Identify other Department(s) that will be involved and their role.

OTHER DEPARTMENT(S)	ROLE
Parks and Recreation	Litter/Trash Pick-up
Public Works	Street Sweeper trash pickup

Identify if you will partner with another MS4 Operator, or with another institution (e.g. Chamber of Commerce, Environmental interest organizations, civic groups) in order to carry out the chosen BMPs.

ENTITY	BMP
Not at this time.	

Will another governmental entity be responsible for implementing one or more chosen BMPs? If so, identify the entity and which BMP(s) it will implement. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.

ENTITY	BMP
Not at this time.	



**ADDENDUM TO SMALL MS4 NPDES PERMIT NOI - BMPs MEASURABLE GOALS AND MILESTONES**

The purpose of this addendum is to record the measurable goals for each BMP, and the dates (month and year) by which interim actions are to be accomplished. Space is given for four BMPs for each of the six minimum measures. If necessary, attach additional BMP MEASURABLE GOALS AND MILESTONES as a separate attachment.

Measurable goals are BMP design objectives, or goals that will quantify the progress of implementing the actions or performance of a BMP. They are ways to measure activities or effects of a BMP. For each of the six minimum measures and for each BMP, define the measurable goal you will use to monitor effectiveness of this BMP. The BMPs you list here should match exactly those given in Part V., 1-5 of this NOI. For purposes of this NOI, the Public Education and Outreach and Public Involvement/Participation minimum measures have been combined.

For each BMP, establish milestones for implementation. These tables are set up for once/year milestones. You may change the milestone dates to time frames less than one year. *\*If PIE is not included as attachment, please put events and dates in the Measureable Goals and Milestones.*

<b>BEST MANAGEMENT PRACTICES FOR PUBLIC EDUCATION AND PUBLIC PARTICIPATION</b>	
<b>BMP 1A</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	City Stormwater Web Page
Milestone Year 1	Modify and update Stormwater Web Page to include ordinances, educational information, and Stormwater contact information.
Milestone Year 2	Continue all of the above.
Milestone Year 3	Continue all of the above.
Milestone Year 4	Continue all of the above.
Milestone Year 5	Continue all of the above.

<b>BMP 1B</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Stormwater Educational Material
Milestone Year 1	Host an educational and fun event at the Boys & Girls Club. The children will watch a video on Freddy the Fish, receive Tucker the Turtle pencil bags, pencils, erasers, and sharpeners, and additional educational materials. Provide educational materials to the local library.
Milestone Year 2	Continue Boys & Girls Club event. Develop educational pamphlets/brochures concerning household impact on water quality, stormwater, pollution impacts, and pollution prevention. Distribute materials at Cornfest, library, and Boys & Girls Club. Participate in Non-Commercial Sustaining Announcements (NCSAs) through TNSA and TAB. Develop educational pamphlets targeting each hot spot: lawn care, automotive maintenance, and food service. Mail educational materials to each hot spot annually.
Milestone Year 3	Continue all of the above and update as needed.
Milestone Year 4	Continue all of the above and update as needed.
Milestone Year 5	Continue all of the above and update as needed.

<b>BMP 1C</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Clean Up Day
Milestone Year 1	Partner with local Boys & Girls Club to perform a park clean up. Provide brochures and Tucker the Turtle packets.
Milestone Year 2	Continue all of the above.
Milestone Year 3	Continue all of the above. Invite additional organizations to participate in the Park Clean Up Day.
Milestone Year 4	Continue all of the above.
Milestone Year 5	Continue all of the above.

<b>BMP 1D</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Public Media Notifications.
Milestone Year 1	The City of Union City will notify and educate the public of Stormwater pollution through the newspaper, radio, and TV broadcasts.
Milestone Year 2	Continue all of the above.
Milestone Year 3	Continue all of the above.

Milestone Year 4	Continue all of the above.
Milestone Year 5	Continue all of the above.

BEST MANAGEMENT PRACTICES FOR ILLICIT DISCHARGE DETECTION AND ELIMINATION	
<b>BMP 2A</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Active Inspections
Milestone Year 1	Develop IDDE plan, inspection form, and Enforcement Response Plan.
Milestone Year 2	Begin annual inspection of detention ponds and annual dry weather inspections of outfalls (25% outfalls/yr). Document and file inspection forms for active sites. If possible, provide inspection forms in the form of Android/iPhone app.
Milestone Year 3	Continue all of the above.
Milestone Year 4	Continue all of the above.
Milestone Year 5	Continue all of the above.
<b>BMP 2B</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Awareness and Education on Illicit Discharges
Milestone Year 1	Include illicit discharge in all stormwater educational efforts. Ask public to report any illicit discharges and provide contact information for them to do so.
Milestone Year 2	Continue to educate the public (per PIE) and ask them to report any illicit discharge to the MS4. Revise as necessary.
Milestone Year 3	Continue all of the above.
Milestone Year 4	Continue all of the above.
Milestone Year 5	Continue all of the above.

<b>BMP 2C</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Stormwater Input/Outfall Map
Milestone Year 1	Continue to update elements of storm sewer map in GIS. Locate and mark 20% of hotspots yearly.
Milestone Year 2	Continue all of the above.
Milestone Year 3	Continue all of the above.
Milestone Year 4	Continue all of the above.
Milestone Year 5	Continue all of the above.

BEST MANAGEMENT PRACTICES FOR CONSTRUCTION SITE RUNOFF PROGRAM	
<b>BMP 3A</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Stormwater Management Ordinance
Milestone Year 1	Update current ordinance. Ensure ordinance compliance with CGP.
Milestone Year 2	Implement and enforce ordinance.
Milestone Year 3	Continue to enforce ordinance.
Milestone Year 4	Continue to enforce ordinance.
Milestone Year 5	Continue to enforce ordinance.
<b>BMP 3B</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	EPSC BMP Manual
Milestone Year 1	Adopt and begin to enforce using state EPSC BMP Manual
Milestone Year 2	Continue to enforce using state EPSC BMP Manual
Milestone Year 3	Continue to enforce using state EPSC BMP Manual
Milestone Year 4	Continue to enforce using state EPSC BMP Manual
Milestone Year 5	Continue to enforce using state EPSC BMP Manual

<b>BMP 3C</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Site Plan Review Process
Milestone Year 1	Establish and post to the Public the Plans Review Process.
Milestone Year 2	Continue to monitor Site Plan Review Process and update as needed.
Milestone Year 3	Continue to monitor Site Plan Review Process and update as needed.
Milestone Year 4	Continue to monitor Site Plan Review Process and update as needed.
Milestone Year 5	Continue to monitor Site Plan Review Process and update as needed.

<b>BMP 3D</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Inspections
Milestone Year 1	Maintain inspection program. Revise inspection forms and begin regular inspection of active sites.
Milestone Year 2	Continue all of the above. Additionally, provide inspection forms in the form of Android/iPhone app, if possible.
Milestone Year 3	Continue all of the above.
Milestone Year 4	Continue all of the above.
Milestone Year 5	Continue all of the above.

<b>BEST MANAGEMENT PRACTICES FOR PERMANENT (POST-CONSTRUCTION) STORMWATER MANAGEMENT PROGRAM</b>	
<b>BMP 4A</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Permanent Stormwater Management
Milestone Year 1	Continue implementing existing program requirements. Research available options for revising program requirements to ensure conformance to the MS4 permit.
Milestone Year 2	Continue implementing existing program requirements. Continue to Research available options for revising program requirements to ensure conformance to the MS4 permit. Submit implementation plan by January 1, 2018 and revise as needed based on response from TDEC.
Milestone Year 3	Implement program as specified in final implementation plan.
Milestone Year 4	Implement program as specified in final implementation plan.
Milestone Year 5	Implement program as specified in final implementation plan.
<b>BMP 4B</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Ordinance Enforcement
Milestone Year 1	Continue enforcing permanent stormwater management requirements per current Ordinance. Review 2016 permit options for adoption.
Milestone Year 2	Adopt 2016 permit options if chosen. Implement and enforce permanent stormwater management requirements
Milestone Year 3	Continue.
Milestone Year 4	Continue.
Milestone Year 5	Continue.

<b>BEST MANAGEMENT PRACTICES FOR MUNICIPAL POLLUTION PREVENTION AND GOOD HOUSEKEEPING</b>	
<b>BMP 5A</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Good Housekeeping Training for Employees
Milestone Year 1	New employees receive new employee good housekeeping training upon hire in the form of written materials. Documentation is kept with the employees' signature.
Milestone Year 2	Continue new employee good housekeeping training as well Good Housekeeping training to all personnel at least once every five years.
Milestone Year 3	Continue.
Milestone Year 4	Continue.
Milestone Year 5	Continue.
<b>BMP 5B</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goal(s)	Annual Inspections
Milestone Year 1	Revise inspection form and conduct annually, with proper documentation, Housekeeping inspections of Municipal Facilities and Operations requiring O&M Plan. Update as needed.
Milestone Year 2	Continue conducting monthly Housekeeping inspections. Additionally, provide inspection forms in the form of Android/iPhone app.
Milestone Year 3	Continue.
Milestone Year 4	Continue.
Milestone Year 5	Continue.

<b>BMP 5C</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
<b>Goal(s)</b>	<b>Review O&amp;M Plan yearly for Municipal Operations &amp; PUB</b>
<b>Milestone Year 1</b>	Department heads will review each of the Municipal Operations O&M Plans yearly and see if any improvements need to be made or changes based on changing operations. Update as needed.
<b>Milestone Year 2</b>	Department heads will review each of the Municipal Operations O&M Plans yearly and see if any improvements need to be made or changes based on changing operations. Update as needed.
<b>Milestone Year 3</b>	Department heads will review each of the Municipal Operations O&M Plans yearly and see if any improvements need to be made or changes based on changing operations. Update as needed.
<b>Milestone Year 4</b>	Department heads will review each of the Municipal Operations O&M Plans yearly and see if any improvements need to be made or changes based on changing operations. Update as needed.
<b>Milestone Year 5</b>	Department heads will review each of the Municipal Operations O&M Plans yearly and see if any improvements need to be made or changes based on changing operations. Update as needed.