NPDES MS4 Annual Report

version 1.6

**(Submission #: HPX-4Q6C-1ETMY, version 1)**

# Details

**Originally Started By** Sarah Totty

**Submission ID** HPX-4Q6C-1ETMY

**MS4 Owner Name** City of Brentwood

**Status** Draft

# Form Input

## General Information

### Permit Number

TNS075175

### MS4 Owner/Operator (e.g. City of ...)

City of Brentwood

### County

Williamson

### Reporting Period

Per subpart 5.1

1. The Annual Report shall cover the period beginning on July 1st and ending on June 30th;
2. The Annual Report shall be due on September 30th after the end of the reporting period.

### Reporting Period Start Date

07/01/2022

### Reporting Period End Date

06/30/2023

### MS4 Population At NOI Submittal

25,001 ≤ Population ≤ 50,000

### Name and contact information of MS4 Responsible Authority (e.g. Mayor ...) Prefix

*Mr.*

### First Name

Kirk

### Title

**Last Name**

*Bednar*

*Assistant City Manager*

### Company Name

*City of Brentwood*

### Phone Type Number Extension

Business 615-371-0060

### Email

[kirk.bednar@brentwoodtn.gov](mailto:kirk.bednar@brentwoodtn.gov)

### Address

5211 Maryland Way

Brentwood, TN 37027

### Designated MS4 Stormwater Management Program Contact Prefix

*NONE PROVIDED*

### First Name

Sarah Katherine

### Title

**Last Name**

*Totty*

*Acting Stormwater Coordinator*

### Company Name

*City of Brentwood*

### Phone Type Number Extension

Business 615-371-0060

### Email

[sarah.totty@brentwoodtn.gov](mailto:sarah.totty@brentwoodtn.gov)

### Address

5211 Maryland Way

Brentwood, TN 37027

## MCM 1: Public Education

Below report on the educational activities completed during the reporting year. Delete unused rows (click X at end of row). Add rows (add row button on bottom of table) to report add activities.

### Provide the number of activities completed during the reporting year for the Public (Subpart 4.2.1.1. of the permit).

6

### Provide the number of activities completed during the reporting year for the Engineering and Development Community (Subpart 4.2.1.2. of the permit).

4

### How many employees (that are new to the MS4 or new to the job category) have NOT been educated in accordance with the PIE plan within 6 months?

0

### For existing employees: provide the total number of employees NOT educated in accordance with the PIE plan within the permit term.

0

A population of 25,001 ≤ Population ≤ 50,000 at NOI submittal was selected in the General Information Section. Per Subpart 4.2.1.1. the MS4 is required to conduct three (3) activities during the reporting year addressing each of the four (4) management measures for the public. A single activity may address multiple management measures.

You may need to use the scroll bars to view the whole table.

To Add a Row - Click Add Row near the bottom right of the table To Delete a Row - Click the "X" at the far right end of the row.

### Column Descriptions

Target Audience (This column is fixed and cannot be changed.)

Activity Description: (Provide details as to the specific activity that was conducted.)

Management Measure: Impacts on Water Quality (Select Yes if the activity listed in this row addressed the 4.2.1.1.a.General awareness of the impacts on water quality.)

Management Measure: SCM/BMP Maintenance (Select Yes if the activity listed in this row addressed the 4.2.1.1.b. Awareness of the importance of maintenance activities for operators of permanent Best Management Practices (BMPs)/Stormwater Control Measures (SCMs).)

Management Measure: Storage, Use, Disposal of Fluids (Select Yes if the activity listed in this row

addressed the 4.2.1.1.c. Awareness of the proper storage, use, and disposal of pesticides, herbicides, fertilizers oil and other automotive- related fluids.)

Management Measure: Illicit Discharges (Select Yes if the activity listed in this row addressed the 4.2.1.1.d. Awareness of identifying and reporting procedures for illicit connections/discharges, sanitary sewer seepage, spills, etc.)

Date of Activity (Enter the date the activity took place. If the activity took place across multiple days enter the Date of the first day of the activity.)

Specifically Targeted Audience (This column is used to provide more details as to the audience the activity was targeting e.g. school age children, Homeowners with SCMs) A broad based event such as tabling at a festival may list general public as the specifically targeted audience.

# of Audience (Enter the approximate number of individuals that were reached with this activity.)

Sponsored Activities (Identify if the event sponsored

monetarily e.g. money or as a donation in kind e.g. goods or services by the MS4 program. If it was not a sponsored activity, leave N/A in the cell.)

### Provide the status of your MS4 program’s public education and outreach activities for the Public audience during the reporting period.

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Target Audience** | **Activity Description** | **Management Measure: Impacts on Water Quality** | **Management Measure: SCM/BMP**  **Maintenance** | **Management Measure: Storage, Use, Disposal of Fluids** | **Management Measure: Illicit Discharges** | **Date of Activity** | **Specifically Targeted Audience** | **#**  **Audi** |
| Public | Environmental Education Day | Yes | Yes | Yes | Yes | 10/5/2022 | High School Students | 350 |
| Public | Harpeth Valley Conservancy Ads | Yes | Yes | No | Yes | 6/15/2023 | Tennessee Residents | 5000 |
| Public | City of Brentwood Newsletter | Yes | Yes | Yes | Yes | 10/1/2022 | City of Brentwood | 1000 |
| Public | Channel 19 Stormwater Ads | Yes | No | Yes | Yes | 8/1/2022 | City of Brentwood Residents | 1000 |
| Public | TNSA Ads | Yes | Yes | Yes | Yes | 6/1/2022 | Stormwater Professionals/Citizens | 1200 |
| Public | Harpeth River Clean Up | Yes | No | No | No | 1/28/2023 | Community Members | 300 |

A population of 25,001 ≤ Population ≤ 50,000 at NOI submittal was selected in the General Information Section. Per Subpart 4.2.1.2. the MS4 is required to conduct one (1) activity during the reporting year addressing each of the two (2) management measures for the Engineering and Development Community. A single activity may address multiple management measures.

You may need to use the scroll bars to view the whole table.

To Add a Row - Click Add Row near the bottom right of the table To Delete a Row - Click the "X" at the far right end of the row.

### Column Descriptions

Target Audience (This column is fixed and cannot be changed.)

Activity Description: (Provide details as to the specific activity that was conducted.)

Management Measure: Long Term Water Quality Impacts (Select Yes if the activity listed in this row addressed the 4.2.1.2.a Awareness of the stormwater ordinances, regulations, and guidance

materials related to long-term water quality impacts.)

Management Measure: Construction Water Quality Impacts (Select Yes if the activity listed in this row addressed the 4.2.1.2.b.

Awareness of stormwater ordinances, regulations, and guidance materials related to construction phase water quality impacts.)

Date of Activity (Enter the date the activity took place. If the activity took place across multiple days enter the Date of the first day of the activity.)

Specifically Targeted Audience (This column is used to provide more details as to the audience the activity was targeting e.g. restaurants, Engineers, Developers ) A broad based event such as tabling at a local trade show may list commercial and development community as the specifically targeted audience.

# of Audience (Enter the approximate number of individuals that were reached with this activity.)

### Provide the status of your MS4 program’s public education and outreach activities for the Engineering and Development Community during the reporting period.

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Target Audience** | **Activity Description** | **Management Measure: Long Term Water Quality Impacts** | **Management Measure: Construction Water Quality Impacts** | **Date of Activity** | **Specifically Targeted Audience** | **# of Audience** |
| Engineering and Development Community | Bell Rive Pre- Construction Meeting | Yes | Yes | 2/21/2023 | Developers, Contractors, and Engineers | 7 |
| Engineering and Development Community | Taube Pre- Construction Meeting | Yes | Yes | 10/10/2022 | Developers, Contractors, and Engineers | 7 |
| Engineering and Development Community | Brentwood Middle School | Yes | Yes | 07/13/2022 | Developers, Contractors, and Engineers | 9 |
| Engineering and Development Community | Raintree Phase 4 - Repeated EC Violations | Yes | Yes | 9/12/2022 | City Personnel, Builders, Developers, and Erosion Control Company | 13 |

**Supporting Documentation for Activities described in this section.**

Fall 2022 Newsletter.pdf - 08/28/2023 01:07 PM Spring 2023 City Update.pdf - 08/28/2023 01:07 PM

Harpeth Conservancy-Summer-Newsletter-2023.pdf - 08/28/2023 01:07 PM 2022 Station List FINAL.pdf - 08/28/2023 01:14 PM

Environmental Education Day - Quiz - Information Sheet 2022.pdf - 08/28/2023 01:34 PM Student Response to Environmental Education Day 2022.pdf - 08/28/2023 01:34 PM 20221005\_103042.jpg - 08/28/2023 01:36 PM

20221005\_103434.jpg - 08/28/2023 01:36 PM

20221005\_103432.jpg - 08/28/2023 01:36 PM

2022-2023\_TNSA\_SMC\_Results.pdf - 08/28/2023 03:33 PM

6301 Belle Rive Pre-con meeting minutes.pdf - 09/07/2023 02:33 PM Taube PreCon.pdf - 09/07/2023 02:33 PM

brentwood middle pre-con meeting minutes.pdf - 09/07/2023 02:36 PM

### Comment

NONE PROVIDED

### Notes:

NONE PROVIDED

## MCM 2: Public Involvement And Participation

Below report on the involvement/participation activities completed during the reporting year. Delete unused rows (click X at end of row). Add rows (add row button on bottom of table) to report add activities.

### Is your Stormwater Management Program Plan documentation available online?

Yes

### Provide the web address for the Stormwater Management Program plan documentation

[https://www.brentwoodtn.gov/departments/engineering/stormwater-quality-management-program](http://www.brentwoodtn.gov/departments/engineering/stormwater-quality-management-program)

### Was the MS4 program documentation formally placed on public notice during the reporting year?

Yes

### Provide a copy of the public notice and response to comments.

NONE PROVIDED

### Comment

NONE PROVIDED

Subpart 4.2.2. requires the following in the annual report Detail applicable changes as directed in subpart 4.4.1

This requirement will be located in the Program Modifications Section

### Is information for all construction site projects accessible to the public?

No

### Number of comments received from the public on construction site projects.

200

### Are all comments from the public on construction site projects considered?

Yes

### Number of reports during the reporting period received from the public via public reporting system (IDDE reports)?

0

### Provide the number of activities completed during the reporting year for the General Public (Subpart 4.2.2.1. of the permit).

3

### Provide the number of activities completed during the reporting year for the Commercial and Development Community (Subpart 4.2.2.2. of the permit).

4

A population of 25,001 ≤ Population ≤ 50,000 at NOI submittal was selected in the General Information Section. Per Subpart 4.2.2.1. the MS4 is required to conduct three (3) activities during the reporting year addressing each of the four (4) management measures for the general public. A single activity may address multiple management measures.

You may need to use the scroll bars to view the whole table.

To Add a Row - Click Add Row near the bottom right of the table To Delete a Row - Click the "X" at the far right end of the row.

### Column Descriptions

Target Audience (This column is fixed and cannot be changed.)

Activity Description: (Provide details as to the specific activity that was conducted.)

Management Measure: Pollution Prevention (Select Yes if the activity listed in this row addressed the 4.2.2.1.a Pollution Prevention Management Measure.)

Management Measure: Impacts on Water Quality (Select Yes if the activity listed in this row addressed the 4.2.2.1.b. Impacts on water quality or local stormwater management issues.)

Management Measure: Storage, Use, Disposal of Fluids (Select Yes if the activity listed in this row addressed the 4.2.2.1.c. Storage, use, and disposal of household hazardous waste, automotive related fluids, pesticides, herbicides, and fertilizers use.)

Management Measure: Illicit Discharges (Select Yes if the activity listed in this row addressed the 4.2.2.1.d. Identifying and reporting procedures for illicit connections/discharges, sanitary sewer seepage, spills, etc.)

Date of Activity (Enter the date the activity took place. If the activity took place across multiple days enter the Date of the first day of the activity.)

Specifically Targeted Audience (This column is used to provide more details as to the audience the activity was targeting e.g. school age children, Homeowners with SCMs) A broad based event such as tabling at a festival may list general public as the specifically targeted audience.

# of Audience (Enter the approximate number of individuals that were reached with this activity.)

Sponsored Activities (Identify if the event sponsored

monetarily e.g. money or as a donation in kind e.g. goods or services by the MS4 program. If it was not a sponsored activity, leave N/A in the cell.)

### Provide the status of your MS4 program’s public involvement/participation activities for the General Public audiences during the reporting period.

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Target Audience** | **Activity Description** | **Management Measure: Pollution Prevention** | **Management Measure: Impacts on Water Quality** | **Management Measure: Storage, Use, Disposal of Fluids** | **Management Measure: Illicit Discharges** | **Date of Activity** | **Specifically Targeted Audience** | **# of Audience** |
| General Public | Environmental Education Day | Yes | Yes | Yes | Yes | 10/5/2022 | High School Students | 300 |
| General Public | Harpeth River Clean Up | Yes | Yes | No | No | 1/29/2023 | Community Members | 300 |
| General Public | Presentation to City Commission Concerning Results of Citywide Master Drainage Study | No | No | No | Yes | 12/01/2022 | Brentwood Citizens and Commissioners | 20 |

A population of 25,001 ≤ Population ≤ 50,000 at NOI submittal was selected in the General Information Section. Per Subpart 4.2.2.2. the MS4 is required to conduct one (1) activity during the reporting year addressing each of the two (2) management measures for the Commercial and Development Community. A single activity may address multiple management measures.

You may need to use the scroll bars to view the whole table.

To Add a Row - Click Add Row near the bottom right of the table To Delete a Row - Click the "X" at the far right end of the row.

### Column Descriptions

Target Audience (This column is fixed and cannot be changed.)

Activity Description: (Provide details as to the specific activity that was conducted.)

Management Measure: Pollution Prevention (Select Yes if the activity listed in this row addressed the 4.2.2.2.a Pollution Prevention Management Measure.)

Management Measure: Impacts on Water Quality (Select Yes if the activity listed in this row addressed the 4.2.2.2.b. Impacts on water quality or local stormwater management issues.)

Date of Activity (Enter the date the activity took place. If the activity took place across multiple days enter the Date of the first day of the activity.)

Specifically Targeted Audience (This column is used to provide more details as to the audience the activity was targeting e.g. restaurants, Engineers, Developers ) A broad based event such as tabling at a local trade show may list commercial and development community as the specifically targeted audience.

# of Audience (Enter the approximate number of individuals that were reached with this activity.)

### Provide the status of your MS4 program’s public involvement/participation activities for the Commercial and Development Community during the reporting period.

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Target Audience** | **Activity Description** | **Management Measure: Pollution Prevention** | **Management Measure: Impacts on Water Quality** | **Date of Activity** | **Specifically Targeted Audience** | **# of Audience** |
| Commercial and Development Community | Bell Rive Pre- Construction Meeting | Yes | Yes | 2/21/2023 | Developers, Contractors, and Engineers | 7 |
| Commercial and Development Community | Taube Pre- Construction Meeting | Yes | Yes | 10/10/2022 | Developers, Contractors, and Engineers | 7 |
| Commercial and Development Community | Brentwood Middle School | Yes | Yes | 7/12/2022 | Developers, Contractors, and Engineers | 9 |
| Commercial and Development Community | Raintree Phase 4  - Repeated EC Violations | Yes | Yes | 09/12/2022 | City Personnel, Builders, Developers, and Erosion Control Company | 13 |

**Supporting Documentation for Activities described in this section.**

Environmental Education Day - Quiz - Information Sheet 2022.pdf - 09/07/2023 03:02 PM 20221005\_103432.jpg - 09/07/2023 03:02 PM

20221005\_103042.jpg - 09/07/2023 03:02 PM

20221005\_103434.jpg - 09/07/2023 03:02 PM

Student Response to Environmental Education Day 2022.pdf - 09/07/2023 03:02 PM City Stormwater Study - CC Briefing Presentation.pdf - 09/14/2023 12:43 PM **Comment**

NONE PROVIDED

### Notes:

NONE PROVIDED

## MCM 3: Illicit Discharge Detection & Elimination (IDDE)

### Is the storm sewer map available through Spatial Rest Services?

Yes

### Provide location for Spatial Rest Service for Map Layer(s)

https://maps.brentwoodtn.gov/portal/apps/webappviewer/index.html?id=cd4b17289413496d96a893eabbd927aa#

### The number of potential illicit discharges reported by the public.

0

### The number of potential illicit discharges reported by internal personnel.

2

### Total number of potential Illicit discharges reported (from any source) that are under investigation at the time of the annual report.

0

### Were all potential illicit discharges investigated within 7 days of receipt?

Yes

### Number of identified illicit discharges

2

### Were all initial enforcement actions on confirmed illicit discharges taken within seven (7) calendar days of the investigation?

Yes

### Number of corrective actions plans received for confirmed illicit discharges.

2

### Were all corrective actions plans reviewed in accordance with established procedures?

Yes

### Number of non-stormwater discharges or flows identified as a significant contributor of pollutants to the MS4.

0

### Total number of non-stormwater discharges or flows investigated.

0

### Were all non-stormwater discharges or flows identified as a significant contributor of pollutants to the MS4 investigated?

Yes

## MCM 4: Construction Site Stormwater Runoff Pollutant Control

For reporting construction activities in this section, count all activities e.g., projects, sites that were active during the reporting period. It is understood that activities will overlap multiple reporting years. For example: If a project plan is submitted and reviewed in reporting year 1, that plan review will go only on the report for that year. If that same project begins construction in reporting year 2, it would be included in the year 2 report for active construction activity, but not the year 1 report. If a construction activity is terminated in the beginning of a reporting year before the first inspection for that reporting year is required, that activity may be left off the count.

### Identify if the regulatory mechanisms for construction site runoff control have been updated to be consistent with the CGP?

Under Development

### Please provide more details on the development process

Stormwater Ordinance, EPSC Checklist and the Subdivision Regulations are currently undergoing a rewrite to conform with the general permit. The additions to our regulations include updates to our checklists for design storm, updates to inventory requirements of active projects, and waste control. The website will be updated to include public access to construction information.

### Please provide estimated completion date

09/01/2024

### Total number of active construction activities.

106

### Total number of active non-priority construction activities with incomplete inventory information.

0

### Number of new development and redevelopment projects reviewed in accordance with established policies and procedures.

338

### Were all new development and redevelopment projects reviewed in accordance with the established policy and procedure?

Yes

### Number of active non-priority construction activities.

106

### Were all nonpriority active construction activities inspections conducted accordance with Stormwater Management Program.

Yes

### Number of active priority construction activities.

0 - Active priority construction activities is not defined in our current ordinance

### Did all Priority Construction Activities have Pre-Construction meetings?

Yes

### Were all priority Construction Activities inspected at least once per calendar month?

Yes

## MCM 5: Post Construction/ Permanent Stormwater Management

### Has an offsite mitigation program or payment in lieu into a public stormwater fund been developed as outlined in subpart 4.2.5.3.?

No

### Did all of the projects approved meet the buffer requirements of subpart 4.2.5.4?

Yes

### Does the Stormwater Management Program implement alternative buffer widths?

No

Information on EPA's Water Quality Scorecard can be found on the EPA's website. [Water Quality Scorecard Information](https://www.epa.gov/smartgrowth/water-quality-scorecard)

The scorecard can be found on EPA's website. [Water Quality Scorecard](https://19january2021snapshot.epa.gov/sites/static/files/2014-04/documents/water-quality-scorecard.pdf)

### Scorecard

NONE PROVIDED

### Comment

NONE PROVIDED

### Number of all new development and redevelopment projects reviewed.

338

### Number of new development and redevelopment projects reviewed in accordance with the established policy and procedure.

338

### Number of sites verified that 100% of SCMs are installed per design specifications in accordance with approved plan.

29

### Were all SCMs verified to be installed per design specifications in accordance with approved plan within 90 days of installation?

Yes

### Does the permittee have adequate legal authority as required by 4.2.5.7 for all SCMs installed?

Yes

### Number of SCMs that have not been properly operated or maintained.

15

### Have enforcement actions been taken in accordance with the appropriate legal authority or ERP?

Yes

### Number of public requests for SCM inventory.

0

### Are all SCMs in the inventory tracking system?

Yes

### Do all SCMs in the inventory tracking system have complete information?

Yes

### SCM inventory tracking system information

NONE PROVIDED

### Comment

NONE PROVIDED

## MCM 6: Pollution Prevention/Good Housekeeping For Municipal Operations

### Number of Municipal Operations Facilities under subpart 4.2.6.2.

9

### Do all Municipal Operations Facilities have a O&M Facility Plan?

Yes

### Number Municipal Operations Facilities NOT inspected in accordance with the Stormwater Management Program in the previous 12 months.

0

## Stormwater Management Program Modification

### Have any municipal facilities covered under this permit been added during the reporting term?

Yes

In the table below identify if any changes were made to your Stormwater Management Program during the reporting period.

For minor modifications that add, but neither subtract nor replace, components, controls, or requirements to the Stormwater Management Program provide a description of that modification. - See Subpart 4.4.1.1.a

For minor modifications that replace an ineffective or infeasible BMP, or SCM which is specifically identified in the Stormwater Management Program provide a description of the analysis of why the former BMP was ineffective or infeasible; Expectations on the effectiveness of the replacement BMP or SCM; and an analysis, if applicable, of why the replacement BMP or SCM will ensure the optimization of equipment use. a description of that modification. - See Subpart 4.4.1.1.e

For major modifications that subtract BMPs, SCMs, components, controls, or requirements of the Stormwater Management Program provide a description of the analysis of why the component was ineffective or infeasible; and detailed explanation of why, with the elimination of this component, the Stormwater Management Program will continue to achieve a reduction in pollutants to the MEP and shall not cause or contribute to violations of State water quality standards in the receiving stream. - See Subpart 4.4.1.2.a.

### Where any changes were made to the program elements during the reporting period?

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Program Elements** | **Changes** | **Modifications that Add Components** | **Replaced an Ineffective or Infeasible BMP or SCM** | **Subtracted BMP, SCM, Components, Controls etc.** |
| MCM 1 | Yes | Started the Channel 19 Stormwater Ads that run for Brentwood citizens. Updated PIE plan and received student feedback for our Environmental Education Day. | None | None |
| MCM 2 | No | None | None | None |
| MCM 3 | Yes | Updated ERP to make sure it is consistent with the City's enforcement responses. | None | None |
| MCM 4 | Yes | Added drainage basin requirements for buffer widths to engineering review checklists. | None | None |
| MCM 5 | Yes | Inspected 416 permanent stormwater management facilities. 13 were found to have inadequate maintenance and were notified for repairs. These items are now logged in our GIS system differentiating from detention/bio/underground. | None | None |
| MCM 6 | Yes | O&M plans for all facilities are performing required training for all staff. | None | None |
| QLP | Yes | Budgeted a job for another engineer to help run the MS4 program. | None | None |
| Enforcement | No | None | None | None |
| Monitoring & Program Evaluation | No | None | None | None |

**Other Program Changes not Identified above**

NONE PROVIDED

## Summary Of Enforcement Actions

Note: Non-traditional MS4s may not have legal authority to enforce one or more MS4 permit requirements. For example, a university campus regulated as a MS4 permittee or co-permittee may not have the legal authority to enforce MS4 permit requirements against another entity.

**Summary of Enforcement Actions Taken during the reporting year**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Action** | **IDDE** | **Construction** | **Permanent Stormwater/Post-Construction** | **Total** |
| Verbal Warnings | 0 | 7 | 0 | 7 |
| Written Notice of Violation | 1 | 54 | 14 | 69 |
| Citations or Administrative Orders | 0 | 0 | 0 | 0 |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Action** | **IDDE** | **Construction** | **Permanent Stormwater/Post-Construction** | **Total** |
| Stop Work Orders | 0 | 13 | 0 | 13 |
| Withholding of Plan Approvals or Other Authorizations | 0 | 0 | 0 | 0 |
| Civil Penalties | 0 | 0 | 0 | 0 |
| Additional Measures | 0 | 0 | 0 | 0 |
|  |  |  |  | Sum: 89 |

## Results Of Information Collected And Analyzed (Monitoring)

### Was monitoring for the reporting year performed in accordance with either 4.6.1.1.1 (Option 1) or 4.6.1.1.2 (Option 2)?

Yes

### Provide a summary describing the results of information collected and analyzed, including monitoring data (analytical and non- analytical), if any, during the reporting period. If no monitoring was completed, explain.

We completed the stream assessments and biological sampling necessary for the permit requirements this year. The City of Brentwood signed a contract with CEC on June 23, 2023 to contract their services to complete these requirements. The contract has been uploaded below including results from the analysis.

For your convenience, links to the required standard templates for reporting the results of your monitoring data are provided below. EDD Sheets (Field Stream Survey and Habitat Sheets, Macroinvertebrate Taxa Report, and the TDEC E. coli and Field Water Parameter Report) are in the section labelled Water Quality Assessment Publications as excel files.

[Publications](https://www.tn.gov/environment/program-areas/wr-water-resources/water-quality/water-quality-reports---publications.html)

### Attach results of all analytical and non-analytical monitoring data collected during this reporting period.

2023-085\_Res\_2023-62.pdf - 08/29/2023 03:03 PM

### Comment

NONE PROVIDED

## Legal Authority

Per subpart 4.7.1.The initial solicitor’s statement will be required in the 2024 annual report for existing permittees and in the third annual report for new permittees.

If modifications are made to the legal authority that necessitate a new evaluation by a solicitor, a new certification statement must be submitted.

### Attach a signed solicitor’s certification statement.

NONE PROVIDED

### Comment

NONE PROVIDED

## Stormwater Management Program Evaluation

### Stormwater Management Program Evaluation

In accordance with subpart 4.6.2. The permittee shall conduct an annual evaluation of the Stormwater Management Program to evaluate compliance with the terms and conditions of the permit, including the effectiveness of the BMPs, components, or controls of its stormwater management program, and the status of achieving the measurable requirements in the permit.

### Summarize the results of the permittee’s annual evaluation of the current Stormwater Management Program.

The current stormwater ordinance and monitoring efforts are very

effective. Stormwater regulations and codes were improved last permit year to expand review of grading, drainage and EC plans of new and improved development.

The regulations require grading, drainage and EC plans for any new addition of 800

s.f. impervious area or more. Brentwood has a total of 416 stormwater facilities. Out of the 416 ponds, all were inspected and 13 of the ponds have been classified as fair or poor condition. Letters have been and are being sent to the owners notifying them that of the issues to be addressed. The remaining 13 ponds to be addressed have silted in basins or inlet pipes, complaints filed, trash, erosion or over grown areas. The attached spreadsheet has a Survey tab, which is the rough data and a Pond Issues tab listing specific concerns. The file contains hyperlinks for pictures, and GIS links. All known underground detention systems are listed, as well. The City of Brentwood has contracted with CEC to rewrite the stormwater ordinance and a portion of the Subdivision Regulations to comply with TDEC's new permit requirements. These efforts are ongoing and will be in effect by the next permit year.

### Identify modifications or replacement of an ineffective activity/control measure/component/BMP.

Last year, the Erosion Control Checklist given

to builders wad updated and a new ordinance to require grading, drainage and EC plans for any new addition of 800 s.f. of impervious area or more was added. Following our audit, we reinstated our local ad campaign and added new videos. We also repaired the damaged public education links on our website. We also updated our Erosion Control Checklist and our Engineering Design Checklist to comply with items noted in the audit.

### Summarize the assessment results, and any modifications and improvements scheduled to be implemented in the next reporting period to improve the program or remedy deficiencies or weaknesses

Within the next year, we will have our new stormwater ordinance and will begin to comply with the new regulations. We plan on boosting the public participation and involvement with additional programs currently in the works. We also are beginning to coordinate all of our public comments in a concise manner and will have a public comment reporting mechanism on our website soon. We are also working on adding our Stormwater GIS system to our public website so that citizens may view. Our IDDE system should be online within the next year so that the public can report Illicit Discharges and we will provide pamphlets that help the public understand the importance of Illicit Discharge Detection and Elimination. We are adding the required water quality measures as determined by the CGP and will be enforcing these guidelines with our trained staff for all new construction sites. We will also be ensuring that all new final plats within the City of Brentwood include a Long Term Maintenance Plan to aid our Post Construction Management.

### Is MCM 1: Public Education and Outreach on Stormwater Impacts compliant with Permit Requirements?

Yes

### Is MCM 2: Public Involvement/Participation compliant with Permit Requirements?

Yes

### Is MCM 3: Illicit Discharge Detection and Elimination (IDDE) compliant with Permit Requirements?

Yes

### Is MCM 4: Construction Site Stormwater Runoff Control compliant with Permit Requirements?

Yes

### Is MCM 5: Post-Construction/Permanent Stormwater Management in New Development and Redevelopment compliant with Permit Requirements?

Yes

### Is MCM 6: Pollution Prevention/Good Housekeeping compliant with Permit Requirements?

Yes

### Is Monitoring Program (subpart 4.6.1.1) compliant with Permit Requirements?

Yes

The following questions are from subpart 5.2 Annual Report Requirements.

### Is the permittee compliant with the permit terms and conditions?

Yes

This determination should be made as to the status of the program at the end of the reporting period and the requirements applicable at that date. For example, the permanent stormwater program changes are not required to be implemented until 24 months after the effective date of the permit. So if the MS4 has not yet implemented those changes at the first annual report, they would still be in compliance, if their program meets the previously established requirements.

### Please Explain

NONE PROVIDED

### Is the permittee relying on another governmental entity to satisfy some of the permit obligations?

No

### Enter additional or clarifying information not elsewhere reported in this document.

NONE PROVIDED

### Any other data specifically requested by the Division to substantiate statements and conclusions reached in the Annual Reports.

NONE PROVIDED

### Comment

NONE PROVIDED

**Attachments**

|  |  |  |  |
| --- | --- | --- | --- |
| **Date** | **Attachment Name** | **Context** | **User** |
| 9/14/2023 12:43 PM | City Stormwater Study - CC Briefing Presentation.pdf | Attachment | Sarah Totty |
| 9/7/2023 3:02 PM | Student Response to Environmental Education Day 2022.pdf | Attachment | Sarah Totty |
| 9/7/2023 3:02 PM | 20221005\_103432.jpg | Attachment | Sarah Totty |
| 9/7/2023 3:02 PM | 20221005\_103042.jpg | Attachment | Sarah Totty |
| 9/7/2023 3:02 PM | 20221005\_103434.jpg | Attachment | Sarah Totty |
| 9/7/2023 3:02 PM | Environmental Education Day - Quiz - Information Sheet 2022.pdf | Attachment | Sarah Totty |
| 9/7/2023 2:36 PM | brentwood middle pre-con meeting minutes.pdf | Attachment | Sarah Totty |

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| --- | --- | --- | --- |
| **Date** | **Attachment Name** | **Context** | **User** |
| 9/7/2023 2:33 PM | Taube PreCon.pdf | Attachment | Sarah Totty |
| 9/7/2023 2:33 PM | 6301 Belle Rive Pre-con meeting minutes.pdf | Attachment | Sarah Totty |
| 8/29/2023 3:03 PM | 2023-085\_Res\_2023-62.pdf | Attachment | Sarah Totty |
| 8/28/2023 3:33 PM | 2022-2023\_TNSA\_SMC\_Results.pdf | Attachment | Sarah Totty |
| 8/28/2023 1:36 PM | 20221005\_103432.jpg | Attachment | Sarah Totty |
| 8/28/2023 1:36 PM | 20221005\_103434.jpg | Attachment | Sarah Totty |
| 8/28/2023 1:36 PM | 20221005\_103042.jpg | Attachment | Sarah Totty |
| 8/28/2023 1:34 PM | Student Response to Environmental Education Day 2022.pdf | Attachment | Sarah Totty |
| 8/28/2023 1:34 PM | Environmental Education Day - Quiz - Information Sheet 2022.pdf | Attachment | Sarah Totty |
| 8/28/2023 1:14 PM | 2022 Station List FINAL.pdf | Attachment | Sarah Totty |
| 8/28/2023 1:07 PM | Harpeth Conservancy-Summer-Newsletter-2023.pdf | Attachment | Sarah Totty |
| 8/28/2023 1:07 PM | Fall 2022 Newsletter.pdf | Attachment | Sarah Totty |
| 8/28/2023 1:07 PM | Spring 2023 City Update.pdf | Attachment | Sarah Totty |