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NPDES MS4 Annual Report

version 1.8

(Submission #: HQ5-4Z77-B4XF9, version 1)

Details

Originally Started By Sarah Totty
Submitted 9/13/2024 (19 days ago) by Kirk Bednar
Submission ID HQ5-4Z77-B4XF9
MS4 Owner Name City of Brentwood
Status In Review
Active Steps Submission Deemed Complete

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

Reporting Period Start Date
07/01/2023

Reporting Period End Date
06/30/2024

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

Last Name
Bednar

Title
City Manager

Company Name
City of Brentwood

Phone Type
Business

Number
615-371-0060

Extension

Email
kirk.bednar@brentwoodtn.gov

Address
*5211 Maryland Way
Brentwood, TN 37027*

Designated MS4 Stormwater Management Program Contact

Prefix

NONE PROVIDED

First Name

Last Name

Sarah Katherine

Totty

Title

City Engineer - Capital Projects

Company Name

City of Brentwood

Phone Type

Number

Extension

Business

6153172290

5340

Email

sarah.totty@brentwoodtn.gov

Address

5211 Maryland Way

Brentwood, Tennessee 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).

4

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

For new employees: provide the total number of employees NOT 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 programs 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	# of Audience	Sponsored Activities
Public	Environmental education day	Yes	Yes	Yes	Yes	10/18/2023	High School Students	230	N/A
Public	City of Brentwood News Letter	Yes	Yes	Yes	Yes	10/01/2023	City of Brentwood Residents	10000	N/A
Public	Channel 19 Stormwater Ads	Yes	No	Yes	No	08/01/2023	City of Brentwood Residents	10000	N/A
Public	TNSA Ads	Yes	Yes	Yes	Yes	07/01/2023	Stormwater Professionals/ Citizens	485000	Monetary
Public	Environmental Advisory Board No Dumping Markers Installations	Yes	No	No	Yes	06/10/2024	City of Brentwood Residents	45000	N/A

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 programs 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	Ragsdale Subdivision EPSC Meeting	Yes	Yes	09/19/2023	Developers, Contractors, and Engineers	6
Engineering and Development Community	Murray Lane Pre- Construction meeting	Yes	Yes	03/27/2024	Developers, Contractors, and Engineers	14
Engineering and Development Community	Ragsdale Road Improvements Pre- construction meeting	Yes	Yes	04/02/2024	Developers, Contractors, and Engineers	8
Engineering and Development Community	219 Granny White Pike Pre-construction meeting	Yes	Yes	04/26/2024	Developers, Contractors, and Engineers	7

Supporting Documentation for Activities described in this section.

[Environmental Education Day - Station List.pdf - 07/22/2024 08:51 AM](#)
[Environmental Education Day - Quiz.pdf - 07/22/2024 08:51 AM](#)
[Environmental Education Day - Station Layout.pdf - 07/22/2024 08:52 AM](#)
[Environmental Education Day - Feedback.pdf - 07/22/2024 08:55 AM](#)
[Environmental Education Day - Photo 4.jpg - 07/22/2024 08:59 AM](#)
[Environmental Education Day - Photo 2.jpg - 07/22/2024 08:59 AM](#)
[Environmental Education Day - Photo 3.jpg - 07/22/2024 08:59 AM](#)
[Environmental Education Day - Photo 1.jpg - 07/22/2024 08:59 AM](#)
[Ragsdale Subdivision EPSC Meeting Minutes.pdf - 07/22/2024 09:05 AM](#)
[Channel 19 Ads.zip - 07/22/2024 09:13 AM](#)
[Environmental Advisory Board Meeting Minutes.pdf - 07/22/2024 09:15 AM](#)
[Murray Lane - Pre con Meeting Notes.pdf - 07/22/2024 09:26 AM](#)
[Granny White Pike - Pre con Meeting Notes.pdf - 07/22/2024 09:27 AM](#)
[Ragsdale - Pre con Meeting Notes.pdf - 07/22/2024 09:36 AM](#)
[Spring 2024 City Update.pdf - 07/22/2024 11:47 AM](#)
[Fall 2023 City Update.pdf - 07/22/2024 11:47 AM](#)
[2023-24 SMC Annual Report.pdf - 07/23/2024 12:18 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>

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.

[Annual Report Draft.pdf - 09/06/2024 10:25 AM](#)

Comment

No comments received.

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.

175

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

Number of reports (or complaints) 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	Sponsored Activities
General Public	Environmental education day	Yes	Yes	Yes	Yes	10/18/2023	High School Students	230	N/A
General Public	Environmental Advisory Board No Dumping Markers Installations	Yes	No	No	Yes	06/10/2024	Community Members	45000	N/A

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	Sponsored Activities
General Public	Planning Commission Agenda Item: Discussion of environmental information and insights from a member of the Environmental Advisory Board.	Yes	Yes	No	No	03/04/2024	Community Members	15	N/A

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	Ragsdale Subdivision EPSC Meeting	Yes	Yes	09/19/2023	Developers, Contractors, and Engineers	6
Commercial and Development Community	Murray Lane Pre-Construction meeting	Yes	Yes	03/27/2024	Developers, Contractors, and Engineers	14
Commercial and Development Community	Ragsdale Road Improvements Pre-construction meeting	Yes	Yes	04/02/2024	Developers, Contractors, and Engineers	8
Commercial and Development Community	219 Granny White Pike Pre-construction meeting	Yes	Yes	04/26/2024	Developers, Contractors, and Engineers	7

Supporting Documentation for Activities described in this section.

[Environmental Education Day - Photo 1.jpg - 07/22/2024 09:45 AM](#)
[Environmental Advisory Board Meeting Minutes.pdf - 07/22/2024 09:45 AM](#)
[Environmental Education Day - Quiz.pdf - 07/22/2024 09:45 AM](#)
[Environmental Education Day - Photo 2.jpg - 07/22/2024 09:45 AM](#)
[Environmental Education Day - Feedback.pdf - 07/22/2024 09:45 AM](#)
[Environmental Education Day - Photo 3.jpg - 07/22/2024 09:45 AM](#)
[Environmental Education Day - Photo 4.jpg - 07/22/2024 09:45 AM](#)
[Environmental Education Day - Station List.pdf - 07/22/2024 09:45 AM](#)
[Environmental Education Day - Station Layout.pdf - 07/22/2024 09:45 AM](#)
[Granny White Pike - Pre con Meeting Notes.pdf - 07/22/2024 09:45 AM](#)
[Ragsdale - Pre con Meeting Notes.pdf - 07/22/2024 09:45 AM](#)
[Murray Lane - Pre con Meeting Notes.pdf - 07/22/2024 09:45 AM](#)
[Ragsdale Subdivision EPSC Meeting Minutes.pdf - 07/22/2024 09:45 AM](#)
[Planning Commission Video \(Environmental Advisory Board\).mov - 07/22/2024 04:13 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.

6

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

6

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.

6

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

Yes

Total number of non-stormwater discharges or flows investigated.

0

Significant Contributor of Pollutants to the MS4**1.3.3.2. Non-stormwater Discharges**

The permittee is authorized to discharge the following non-stormwater sources provided that the permittee has not determined these sources to be significant contributors of pollutants to the MS4:

- Water line flushing
- Landscape irrigation
- Diverted stream flows
- Rising ground waters
- Uncontaminated groundwater infiltration (Infiltration is defined as water other than wastewater that enters a sewer system, including sewer service connections and foundation drains, from the ground through such means as defective pipes, pipe joints, connections, or manholes. Infiltration does not include, and is distinguished from, inflow.)
- Uncontaminated pumped groundwater
- Discharges from potable water sources
- Foundation drains

- Air conditioning condensate
- Irrigation water
- Springs
- Water from crawl space pumps
- Footing drains
- Lawn watering
- Individual residential car washing
- Flows from riparian habitats and wetlands
- Dechlorinated swimming pool discharges
- Street wash water
- Discharges or flows from firefighting activities

Subpart 8.1 Definitions

Significant Contributor is defined as a source of pollutants where the volume, concentration, or mass of a pollutant in a stormwater discharge can cause or threaten to cause pollution, contamination, or nuisance that adversely impact human health or the environment and cause or contribute to a violation of any applicable water quality standards for receiving water.

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?
In Effect

Total number of active construction activities (or sites).
29

Number of new development and redevelopment projects reviewed in accordance with established policies and procedures.
74

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

Number of active non-priority construction activities.
29

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

Number of active priority construction activities.
0

Total number of active non-priority construction activities with incomplete inventory information.
0

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

The 2009 scorecard can be found on TDEC's website.
[Water Quality Scorecard](#)

Scorecard

NONE PROVIDED

Comment

NONE PROVIDED

Number of all new development and redevelopment projects reviewed.

74

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

74

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

57

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.

4

Please Note: This question is asking for the number of SCM that have **NOT** been properly operated or maintained. These are going to be the SCMs with issues that require some action to return to proper operations such as maintenance or repairs.

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 applicable Municipal Operations and Facilities under subpart 4.2.6.2.**

9

Do all applicable Municipal Operations and 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?**

No

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	No	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED
MCM 2	No	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED
MCM 3	No	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED
MCM 4	Yes	Over 733 inspections were preformed through out the reporting period. Additionally, we verified that 57 sites had 100% of their Stormwater Control Measures (SCMs) installed according to design specifications and approved plans. The City reviewed over 377 new development and redevelopment projects, ensuring each met our standards.	NONE PROVIDED	NONE PROVIDED
MCM 5	Yes	Through our inspections, we identified and addressed four SCMs that had not been properly operated or maintained, taking corrective actions to ensure their effectiveness.	NONE PROVIDED	NONE PROVIDED
MCM 6	Yes	During the reporting period, several enhancements were made to the program elements to ensure environmental compliance and improve facility maintenance. The City implemented a regular clean-out schedule for oil and grease separators to maintain optimal performance and prevent potential contamination. Additionally, we upgraded our salt material storage to prevent any offsite discharges, thereby reducing the risk of environmental pollution. Furthermore, we covered our rock storage at the Public Works facility to eliminate the possibility of offsite discharges from this area. These improvements reflect our ongoing commitment to maintaining our facilities to the highest standards and protecting our local environment.	NONE PROVIDED	NONE PROVIDED
QLP	Yes	Hired a new staff engineer to help run the MS4 program.	NONE PROVIDED	NONE PROVIDED
Enforcement	No	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED
Monitoring & Program Evaluation	Yes	This year, we implemented a new E. Coli study on Spence and Holt Creek to satisfy the monitoring section of the TDEC annual report. This study was a crucial modification to our stormwater management practices, aimed at enhancing our understanding of water quality in these water bodies. The results revealed that the E. coli concentration in Spencer Creek exceeded Tennessee's General Water Quality Criteria limit for recreational use, classifying the stream as impaired. Conversely, Holt Creek was found to be within the acceptable limits for recreational use. This study has provided valuable data that will inform future actions and improvements to our stormwater management program.	NONE PROVIDED	NONE PROVIDED

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	9	1	10
Written Notice of Violation	1	23	3	27
Citations or Administrative Orders	0	0	0	0
Stop Work Orders	0	4	0	4
Withholding of Plan Approvals or Other Authorizations	0	0	0	0
Civil Penalties	0	0	0	0
Additional Measures	0	0	0	0
				Sum: 41

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.

The E. coli study, completed on June 12, 2024, by Civil and Environmental Consultants, Inc., was conducted to determine the E. coli concentration rates in both Spencer Creek and Holt Creek for the City of Brentwood. The study revealed that the E. coli concentration in Spencer Creek was 139 cfu/100 ml, which exceeds Tennessee's General Water Quality Criteria limit of 126 cfu/100 ml for recreational use, classifying the stream as impaired. The concentration in Holt Creek was determined to be 124 cfu/100 ml, which is within the limit for recreational use. TDEC was contacted with the results to determine if Spencer Creek is eligible to be updated to a supporting status for pathogens. TDEC responded by saying they would "evaluate them as part of their assessment work."

The 2023 Visual Stream Assessment (VSA) report for the City of Brentwood, conducted by Civil & Environmental Consultants, Inc. (CEC), evaluated Beech Creek, Holt Creek, and Spencer Creek. The assessment spanned a total of 7.6 stream miles and aimed to identify pollutant sources and assess the effectiveness of stormwater management programs as required by the MS4 permit. The survey identified several key issues, including exposed pipes, erosion sites, fish barriers, inadequate buffers, and channel alterations. Notably, an exposed sanitary sewer manhole near Gracelawn Drive and a debris dam near Holly Tree Gap Road were flagged for further inspection.

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

[Publications](#)

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

[317-943_Brentwood E. coli Report 2024 Reduced.pdf - 07/19/2024 03:43 PM](#)

[2023 VSA Report - City of Brentwood - \(CEC Project 317-943\).pdf - 07/19/2024 03:44 PM](#)

Comment

NONE PROVIDED

Legal Authority

Per subpart 4.7.1. The initial solicitor's statement is 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.

Per subpart 4.1.2. All updates to the legal authority (ordinances/resolutions etc.) required by changes to the permit shall be fully implemented and adopted.

Attach a signed solicitor's certification statement.

[Solicitor letter MS4.pdf - 09/12/2024 12:36 PM](#)

Comment

NONE PROVIDED

In order to facilitate the review of the legal authority, please indicate if you used the 2023 MTAS MS4 Model Ordinance?

NONE PROVIDED

Attach Legal Authority - Ordinances, Resolutions, etc

[Subdivision Regulations Tracked Changes.pdf - 08/19/2024 08:43 AM](#)

[PC Meeting Minutes - Chapter 78 and Appendix A.pdf - 08/19/2024 08:43 AM](#)

[Chapter 56 Ordinance 2024-09.pdf - 08/27/2024 03:46 PM](#)

[Chapter 78 Ordinance 2024-07.pdf - 08/27/2024 03:46 PM](#)

Comment

NONE PROVIDED

Attach Legal Authority - Enforcement Response Plan and List or Table of Progressive Enforcement Actions

[City of Brentwood ERP.pdf - 08/19/2024 03:36 PM](#)

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 annual evaluation of the City's Stormwater Management Program indicates that our efforts have been effective in addressing key stormwater issues within the community. Over the past year, we have successfully implemented a range of measures aimed at enhancing water quality and managing runoff. Notably, we have updated the stormwater ordinance and subdivision regulations to align with the latest Tennessee Department of Environment and Conservation (TDEC) permit requirements. These updates were approved August 26, 2024.

Additionally, our program has focused on public education and outreach, increased inspections and maintenance of stormwater infrastructure, and strengthened enforcement actions against non-compliance. These initiatives have contributed to reducing pollutants in stormwater runoff, mitigating flooding risks, and protecting our local waterways. The ongoing improvements and updates to our regulations underscore our proactive approach in safeguarding the city's environment and ensuring the health and safety of our residents.

This year, we implemented a new E. Coli study on Spence and Holt Creek to satisfy the monitoring section of the TDEC annual report. This study was a crucial modification to our stormwater management practices, aimed at enhancing our understanding of water quality in these water bodies. The results revealed that the E. coli concentration in Spencer Creek exceeded Tennessee's General Water Quality Criteria limit for recreational use, classifying the stream as impaired. Conversely, Holt Creek was found to be within the acceptable limits for recreational use. This study has provided valuable data that will inform future actions and improvements to our stormwater management program.

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

We did not find any activities or components of our MS4 program that were ineffective.

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

The assessment results indicate that our Stormwater Management Program has made significant progress in addressing stormwater issues within the city. To further enhance the program, we are scheduled to implement several key modifications and improvements in the next reporting period. A new GIS tracking system for stormwater control measures (SCMs) will be introduced for public use. This system will provide comprehensive information, including the type of SCM, contact details, inspection schedules, and more, facilitating greater transparency and community engagement.

Additionally, our updated stormwater ordinance and subdivision regulations, which have been aligned with the latest TDEC permit requirements, are fully implemented. This will ensure compliance with state regulations and further strengthen our stormwater management practices. Furthermore, we will introduce a new platform that allows residents to provide feedback on new construction projects, enhancing public participation and ensuring that community concerns are addressed promptly. These improvements demonstrate our ongoing commitment to maintaining and improving the effectiveness of our stormwater management efforts.

This reporting year, we plan to hold an informational meeting for all homeowners associations and property associations within the City of Brentwood. The meeting will provide information on their MS4 responsibilities and how to maintain their stormwater control measures to remain in compliance with TDEC standards. Topics will include pollution prevention, water quality impacts, BMP maintenance, and the importance of addressing illicit discharges.

This reporting year, we plan to organize and participate in a stream cleanup event to help maintain the cleanliness of our local waterways. This event will be open to the public and will teach practical ways to contribute to keeping our waters clean. The goal is to create a family-friendly environment for the community to learn about and engage in water conservation efforts. Additionally, participants will gain an understanding of the impact of pollution on water quality and the importance of ongoing maintenance. By involving the community, we hope to foster a sense of responsibility and stewardship for our local water resources.

We plan to update our city's website to include new and updated learning content for the public to engage with and learn about important ways to make a difference in MS4 management. This content will cover topics such as proper surface cleaning techniques to prevent pollution, litter laws, examples of illicit discharges, and a detention pond maintenance guide, among other items. Our goal is to educate the public on practical measures they can take to reduce common pollutants. By providing accessible and informative resources, we aim to empower residents to actively contribute to maintaining the quality of our stormwater systems.

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
9/12/2024 12:36 PM	Solicitor letter MS4.pdf	Attachment	Sarah Totty
9/6/2024 10:25 AM	Annual Report Draft.pdf	Attachment	Sarah Totty
8/27/2024 3:46 PM	Chapter 56 Ordinance 2024-09.pdf	Attachment	Sarah Totty
8/27/2024 3:46 PM	Chapter 78 Ordinance 2024-07.pdf	Attachment	Sarah Totty
8/19/2024 3:36 PM	City of Brentwood ERP .pdf	Attachment	Sarah Totty
8/19/2024 8:43 AM	Subdivision Regulations Tracked Changes.pdf	Attachment	Sarah Totty
8/19/2024 8:43 AM	PC Meeting Minutes - Chapter 78 and Appendix A.pdf	Attachment	Sarah Totty
7/23/2024 12:18 PM	2023-24 SMC Annual Report.pdf	Attachment	Sarah Totty
7/22/2024 4:13 PM	Planning Commission Video (Environmental Advisory Board).mov	Attachment	Sarah Totty
7/22/2024 11:47 AM	Spring 2024 City Update.pdf	Attachment	Sarah Totty
7/22/2024 11:47 AM	Fall 2023 City Update.pdf	Attachment	Sarah Totty
7/22/2024 9:45 AM	Granny White Pike - Pre con Meeting Notes.pdf	Attachment	Sarah Totty
7/22/2024 9:45 AM	Ragsdale - Pre con Meeting Notes.pdf	Attachment	Sarah Totty
7/22/2024 9:45 AM	Murray Lane - Pre con Meeting Notes.pdf	Attachment	Sarah Totty
7/22/2024 9:45 AM	Ragsdale Subdivision EPSC Meeting Minutes.pdf	Attachment	Sarah Totty
7/22/2024 9:45 AM	Environmental Education Day - Photo 1.jpg	Attachment	Sarah Totty
7/22/2024 9:45 AM	Environmental Advisory Board Meeting Minutes.pdf	Attachment	Sarah Totty
7/22/2024 9:45 AM	Environmental Education Day - Quiz.pdf	Attachment	Sarah Totty
7/22/2024 9:45 AM	Environmental Education Day - Photo 2.jpg	Attachment	Sarah Totty
7/22/2024 9:45 AM	Environmental Education Day - Feedback.pdf	Attachment	Sarah Totty
7/22/2024 9:45 AM	Environmental Education Day - Photo 3.jpg	Attachment	Sarah Totty
7/22/2024 9:45 AM	Environmental Education Day - Photo 4.jpg	Attachment	Sarah Totty
7/22/2024 9:45 AM	Environmental Education Day - Station List.pdf	Attachment	Sarah Totty
7/22/2024 9:45 AM	Environmental Education Day - Station Layout.pdf	Attachment	Sarah Totty
7/22/2024 9:36 AM	Ragsdale - Pre con Meeting Notes.pdf	Attachment	Sarah Totty
7/22/2024 9:27 AM	Granny White Pike - Pre con Meeting Notes.pdf	Attachment	Sarah Totty
7/22/2024 9:26 AM	Murray Lane - Pre con Meeting Notes.pdf	Attachment	Sarah Totty
7/22/2024 9:15 AM	Environmental Advisory Board Meeting Minutes.pdf	Attachment	Sarah Totty
7/22/2024 9:13 AM	Channel 19 Ads.zip	Attachment	Sarah Totty
7/22/2024 9:05 AM	Ragsdale Subdivision EPSC Meeting Minutes.pdf	Attachment	Sarah Totty
7/22/2024 8:59 AM	Environmental Education Day - Photo 1.jpg	Attachment	Sarah Totty
7/22/2024 8:59 AM	Environmental Education Day - Photo 4.jpg	Attachment	Sarah Totty
7/22/2024 8:59 AM	Environmental Education Day - Photo 2.jpg	Attachment	Sarah Totty
7/22/2024 8:59 AM	Environmental Education Day - Photo 3.jpg	Attachment	Sarah Totty
7/22/2024 8:55 AM	Environmental Education Day - Feedback.pdf	Attachment	Sarah Totty
7/22/2024 8:52 AM	Environmental Education Day - Station Layout.pdf	Attachment	Sarah Totty
7/22/2024 8:51 AM	Environmental Education Day - Quiz.pdf	Attachment	Sarah Totty
7/22/2024 8:51 AM	Environmental Education Day - Station List.pdf	Attachment	Sarah Totty
7/19/2024 3:44 PM	2023 VSA Report - City of Brentwood - (CEC Project 317-943).pdf	Attachment	Sarah Totty

Date	Attachment Name	Context	User
7/19/2024 3:43 PM	317-943_Brentwood E. coli Report 2024 Reduced.pdf	Attachment	Sarah Totty

Status History

	User	Processing Status
7/15/2024 1:13:21 PM	Sarah Totty	Draft
9/13/2024 10:38:04 AM	Sarah Totty	Signing
9/13/2024 11:12:46 AM	Kirk Bednar	Submitting
9/13/2024 11:16:21 AM	Kirk Bednar	Submitted
9/13/2024 2:10:20 PM	Bill Murph	In Review

Processing Steps

Step Name	Assigned To/Completed By	Date Completed
Form Submitted	Kirk Bednar	9/13/2024 11:16:21 AM
Submission Deemed Complete		

Agreements and Signature(s)

SUBMISSION AGREEMENTS

- ☒ I am the owner of the account used to perform the electronic submission and signature.
- ☒ I have the authority to submit the data on behalf of the facility I am representing.
- ☒ I agree that providing the account credentials to sign the submission document constitutes an electronic signature equivalent to my written signature.
- ☒ I have reviewed the electronic form being submitted in its entirety, and agree to the validity and accuracy of the information contained within it to the best of my knowledge.

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 7.11.2 of the permit.

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in the attached document; and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

Signed
By Kirk Bednar on 09/13/2024 at 11:12 AM