

NPDES MS4 Annual Report

version 1.10

(Submission #: HQD-TC5Y-0CEZQ, version 1)

Details

Originally Started By	Sarah Totty
Submission ID	HQD-TC5Y-0CEZQ
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
- 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
07/01/2024

Reporting Period End Date
06/30/2025

MS4 Population At NOI Submittal
 $25,001 \leq \text{Population} \leq 50,000$

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

Prefix	Mr.	
First Name	Jason	
Last Name	Gage	
Title	City Manager	
Company Name	City of Brentwood	
Phone Type	Number	Extension
Business	615-371-0060	
Email	jason.gage@brentwoodtn.gov	
Address	5211 Maryland Way Brentwood, TN 37027	

Designated MS4 Stormwater Management Program Contact

Prefix

Mrs.

First Name

Last Name

Sarah Katherine

Totty

Title

City Engineer - Capital Projects

Company Name

City of Brentwood

Phone Type

Number

Extension

Business

6153712290

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).

10

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

7

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 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	# of Audience	Sponsored Activities
Public	Environmental Education Day	Yes	Yes	Yes	Yes	03/31/2025	High School Students	220	N/A
Public	City of Brentwood Engineering Department Website Updates	Yes	Yes	Yes	Yes	06/26/2025	City of Brentwood Residents	49000	N/A
Public	Education Brochure Display	Yes	Yes	Yes	Yes	10/10/2024	City of Brentwood Residents	250	N/A
Public	Arbor Day	Yes	Yes	Yes	Yes	03/29/2025	City of Brentwood Residents	300	N/A
Public	Elmbrooke HOA Meeting and Educational Presentation	Yes	Yes	Yes	Yes	02/25/2025	Elmbrooke Residents and HOA members	25	N/A
Public	Kings CrossingVSA Education	Yes	Yes	No	No	03/17/2025	Kings Crossing HOA members and residents	5	N/A
Public	City of Brentwood News Letters	Yes	Yes	Yes	Yes	10/01/2024	City of Brentwood Residents	10000	N/A
Public	Channel 19 Stormwater Ads	Yes	No	Yes	Yes	08/01/2024	City of Brentwood Residents	10000	N/A
Public	TNSA Ads	Yes	Yes	Yes	Yes	07/01/2024	Stormwater Professionals/Citizens	301631	Monetary
Public	Cumberland River Compact Stream Clean Up	Yes	No	Yes	Yes	11/19/2024	General Public, Williamson County Residence	9	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 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	Windy Hill Park Pre- Construction Meeting	Yes	Yes	09/18/2025	Developers, Contractors, and Engineers	6
Engineering and Development Community	Walnut Hills Pre- Construction Meeting	Yes	Yes	03/20/2025	Developers, Contractors, and Engineers	6
Engineering and Development Community	Arcadia Pre- Construction Meeting	Yes	Yes	02/04/2025	Developers, Contractors, and Engineers	6
Engineering and Development Community	Ragsdale Road Widening Pre- Construction Meeting	Yes	Yes	11/04/2024	Developers, Contractors, and Engineers	24
Engineering and Development Community	YMCA Entrance Pre- Construction Meeting	Yes	Yes	10/14/2024	Developers, Contractors, and Engineers	5
Engineering and Development Community	Errico Pre- Construction Meeting	Yes	Yes	10/09/2024	Developers, Contractors, and Engineers	7
Engineering and Development Community	Reserve at Raintree 7&8 Pre-Construction Meeting	Yes	Yes	07/15/2024	Developers, Contractors, and Engineers	9

Supporting Documentation for Activities described in this section.

[PreCon WindyHill Park.pdf - 07/07/2025 04:20 PM](#)
[Precon Reserve at Raintree 7&8.pdf - 07/07/2025 04:20 PM](#)
[PreCon Meeting Notes Arcadia PH II.pdf - 07/07/2025 04:20 PM](#)
[PreCon Errico.pdf - 07/07/2025 04:20 PM](#)
[Precon Walnut Hills.pdf - 07/07/2025 04:20 PM](#)
[Precon Ragsdale Rd Widening.pdf - 07/07/2025 04:20 PM](#)
[Precon YMCA.pdf - 07/07/2025 04:20 PM](#)
[Environmental Education Day - Deerwood Map.pdf - 07/07/2025 04:27 PM](#)
[Environmental Education Day - Station 1.jpg - 07/07/2025 04:27 PM](#)
[Environmental Education Day - Parent Volunteer information sheet.pdf - 07/07/2025 04:27 PM](#)
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[Environmental Education Day - Quiz - Information Sheet 2025.pdf - 07/07/2025 04:27 PM](#)
[Environmental Education Day - 2025 Station List.pdf - 07/07/2025 04:27 PM](#)
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[Environmental Education Day - Station 3-1.jpg - 07/07/2025 04:27 PM](#)
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[Environmental Eduaction Day - Feedback.pdf - 07/07/2025 04:27 PM](#)
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[Environmental Education Day - Student Sign-In Sheets - Filled.pdf - 07/07/2025 04:27 PM](#)
[Channel 19 Ads.zip - 07/07/2025 04:31 PM](#)
[Informational Brochure - Stormwater Pollution Surface Cleaning Pamphlet.pdf - 07/08/2025 10:29 AM](#)
[Informational Brochure - Water Quality Riparian Buffer.pdf - 07/08/2025 10:29 AM](#)
[Informational Brochure - Guide to Detention Pond Maintenance.pdf - 07/08/2025 10:29 AM](#)
[Informational Brochure - Illicit Discharge Examples.pdf - 07/08/2025 10:29 AM](#)
[Informational Brochure - Landscaping, Gardening & Pest Control.pdf - 07/08/2025 10:29 AM](#)
[Informational Brochure - Water Works Construction Guide.pdf - 07/08/2025 10:29 AM](#)
[Informational Brochure - TN Litter Law Brochure.pdf - 07/08/2025 10:29 AM](#)
[Arbor Day - Why Trees Matter - Flyer.pdf - 07/08/2025 10:34 AM](#)
[Arbor Day - Photo 3.jpg - 07/08/2025 10:34 AM](#)
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[Arbor Day - Photo 1.jpg - 07/08/2025 10:34 AM](#)
[Elmbrooke HOA - Sign in sheet.pdf - 07/08/2025 10:38 AM](#)
[Elmbrooke HOA - Training PPT.pdf - 07/08/2025 10:38 AM](#)
[City Update Newsletter - Fall 2024.pdf - 07/08/2025 10:49 AM](#)
[TNSA Ads - Payment Receipt.pdf - 07/08/2025 10:51 AM](#)
[City Update Newsletter - Spring 2025.pdf - 07/08/2025 11:54 AM](#)
[TNSA Ads - 2024-2025 - Annual Report.pdf - 07/22/2025 10:55 AM](#)

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-Management>

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?
Yes

Number of comments received from the public on construction site projects.
19

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)?
1

Provide the number of activities completed during the reporting year for the General Public (Subpart 4.2.2.1. of the permit).
5

Provide the number of activities completed during the reporting year for the Commercial and Development Community (Subpart 4.2.2.2. of the permit).
7

A population of $25,001 \leq \text{Population} \leq 50,000$ 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	03/31/2025	High school students	220	N/A
General Public	Arbor Day	Yes	Yes	Yes	Yes	03/29/2025	City of Brentwood Residents	300	N/A
General Public	Kings CrossingHOA VSA Meeting	Yes	Yes	Yes	Yes	03/17/2025	Kings Crossing HOA members and residents	5	N/A
General Public	Elmbrooke HOA Presentation	Yes	Yes	Yes	Yes	02/25/2025	Elmbrooke residents and HOA members	25	N/A
General Public	Cumberland River Compact stream clean up	Yes	Yes	Yes	Yes	11/19/2024	General public, Williamson County residents	9	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.

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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	Windy Hill Park Pre-Construction Meeting	Yes	Yes	09/18/2025	Developers, Contractors, and Engineers	6
Commercial and Development Community	Walnut Hills Pre-Construction Meeting	Yes	Yes	03/20/2025	Developers, Contractors, and Engineers	6

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	Arcadia Pre-Construction Meeting	Yes	Yes	02/04/2025	Developers, Contractors, and Engineers	6
Commercial and Development Community	Ragsdale Road Widening Pre-Construction Meeting	Yes	Yes	11/04/2024	Developers, Contractors, and Engineers	24
Commercial and Development Community	YMCA Entrance Pre-Construction Meeting	Yes	Yes	10/14/2024	Developers, Contractors, and Engineers	5
Commercial and Development Community	Errico Pre-Construction Meeting	Yes	Yes	10/09/2024	Developers, Contractors, and Engineers	7
Commercial and Development Community	Reserve at Raintree 7&8 Pre-Construction Meeting	Yes	Yes	07/15/2025	Developers, Contractors, and Engineers	9

Supporting Documentation for Activities described in this section.

[CRC Stream Cleanup - 3.JPG - 07/08/2025 11:16 AM](#)
[CRC Stream Cleanup - 2.JPG - 07/08/2025 11:16 AM](#)
[CRC Stream Cleanup - 1.JPG - 07/08/2025 11:16 AM](#)
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[Precon Walnut Hills.pdf - 07/08/2025 11:21 AM](#)

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.
 1

The number of potential illicit discharges reported by internal personnel.
 4

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

4

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.

4

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

Yes

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.

Total number of non-stormwater discharges or flows investigated.

1

Has the MS4 identified an allowable non-stormwater discharges from subpart 1.3.3.2 as a significant contributor of pollutants?

No

Number of non-stormwater discharges (Subpart 1.3.3.2) or flows identified as a significant contributor of pollutants to the MS4.

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?
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.
91

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

The question below is asking for the number of non-priority construction activities that the MS4 **DOES NOT** have all of the required information for which indicates an issue with the MS4's tracking system.

Number of active priority construction activities.
7

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

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

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.
91

Number of new development and redevelopment projects reviewed in accordance with the established policy and procedure.
91

Number of sites verified that 100% of SCMs are installed per design specifications in accordance with approved plan.
63

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.
26

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
<https://maps.brentwoodtn.gov/portal/apps/webappviewer/index.html?id=31e0252700ed4c61b23954f84841c625>

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	Yes	<p>This year, the Engineering Department hosted a booth at the City of Brentwood's annual Arbor Day event.</p> <p>We also updated the City's website to include additional educational and informational resources for residents on key stormwater topics.</p> <p>Our team developed educational brochures, now displayed at City Hall, for residents and visitors to take and learn more about important minimum control measure (MCM) topics.</p> <p>In addition, we hosted meetings with local homeowners' associations to educate their residents on various MCM topics. These meetings helped residents better understand their role in being good stewards of their community.</p>	<i>NONE PROVIDED</i>	<i>NONE PROVIDED</i>

Program Elements	Changes	Modifications that Add Components	Replaced an Ineffective or Infeasible BMP or SCM	Subtracted BMP, SCM, Components, Controls etc.
MCM 2	Yes	<p>This year, the Engineering Department hosted a booth at the City of Brentwood's annual Arbor Day event.</p> <p>We also conducted meetings with local homeowners' associations to educate residents on various minimum control measure (MCM) topics.</p> <p>Additionally, our team participated in the CRC stream cleanup, partnering with the CRC to support their efforts in maintaining cleaner streams and healthier riparian buffers.</p>	NONE PROVIDED	NONE PROVIDED
MCM 3	Yes	Our team updated and expanded the City's website to include an illicit discharge section that both educates residents on the issue and provides clear guidance on who to contact if they witness a potential illicit discharge.	NONE PROVIDED	NONE PROVIDED
MCM 4	Yes	<p>This year, our team prioritized increasing our involvement in construction inspections. As a result, we increased overall enforcement actions by 436%, driven in part by adding an additional inspector to our staff and implementing daily visits to active construction sites. This decreased our number of construction notice of violations this year, showing we are identifying and correcting problems before they are becoming major issues.</p> <p>Our team conducted over 522 inspections this year, including 302 erosion control inspections. Additionally, we verified that 63 sites had 100% of their stormwater control measures installed.</p>	NONE PROVIDED	NONE PROVIDED
MCM 5	Yes	This year, we prioritized increasing our post-construction inspections and identified 26 SCMs in need of maintenance. We met with property owners to educate them on SCM maintenance requirements, emphasize the importance of proper upkeep, and discuss the necessary corrective actions.	NONE PROVIDED	NONE PROVIDED
MCM 6	Yes	<p>Our team performed monthly inspections of each municipal site in accordance with their operations and maintenance plans. These inspections allowed us to identify and require corrective actions, addressing issues in a timely manner.</p> <p>Several enhancements were implemented across the sites, including the addition of EPSC measures various at Parks and Recreation outlets to prevent sediment from leaving the site, replacement of the erosion eel at the Fire Department's salt storage area, maintenance of one of the Fire Department's bioretention ponds, correction of erosion issues at various locations, replacement of fuel spill kits, and more.</p>	NONE PROVIDED	NONE PROVIDED
QLP	Yes	We hired an additional inspector to support and improve construction inspection efforts.	NONE PROVIDED	NONE PROVIDED
Enforcement	No	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED
Monitoring & Program Evaluation	Yes	<p>This year, we completed a visual stream assessment of TN05130204021_0300 and TN05130204021_0200. We also conducted a benthic macroinvertebrate survey on seven streams within the City's MS4 jurisdiction.</p> <p>We analyzed the results of the visual stream assessments and addressed identified issues to improve the health of the streams within our community. Corrective actions included removing dumped trash, investigating potential fish barriers, preventing unnecessary mowing of riparian buffers to stabilize erosion sites, investigating an illicit discharge, removing sediment blockages from pipe outfalls, and more.</p> <p>Our benthic survey results revealed that Habitat scores improved at all seven sites since 2019, with some meeting unimpaired guidelines and others remaining slightly impaired. TMI scores showed Spencer Creek and Holt Creek as healthy, while reduced flows and natural variability likely contributed to slight impairments at the other sites.</p>	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	2	176	17	195

Action	IDDE	Construction	Permanent Stormwater/Post-Construction	Total
Written Notice of Violation	2	12	8	22
Citations or Administrative Orders	0	1	0	1
Stop Work Orders	0	2	0	2
Withholding of Plan Approvals or Other Authorizations	0	0	0	0
Civil Penalties	0	0	0	0
Additional Measures	0	0	0	0
				Sum: 220

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.
This year, the City worked with Civil & Environmental Consultants (CEC) to complete a visual stream assessment of the Unnamed Tributary (UNT) to the Little Harpeth River (TN05130204021_0300) and the UNT to the Little Harpeth River (TN05130204021_0200).

Following the assessment, we reviewed the findings and addressed the identified issues to improve stream health within the community. CEC identified seven sites requiring further investigation and response, and the City implemented corrective actions at each location. These actions included removing dumped trash, eliminating fish barriers, coordinating with an HOA to reduce mowing within the stream buffer, investigating an illicit discharge, removing sediment from an outfall pipe, addressing an erosion site, and reviewing a potential channel alteration. These efforts also provided opportunities to educate property owners on best practices for protecting stream health.

Additionally, the City worked with CEC to conduct a benthic macroinvertebrate survey on seven streams within the MS4 jurisdiction. Results showed habitat assessment scores improved at all seven sites compared to 2019. Several sites, including the UNT to the Little Harpeth River (0300), the Little Harpeth River, Beech Creek, and Owl Creek, achieved scores consistent with unimpaired habitat, while others, including Spencer Creek, the UNT to Little Harpeth (0200), and Holt Creek, remained slightly impaired based on ecoregion standards. TMI scores indicated Spencer Creek and Holt Creek were healthy and non-impaired, while the remaining sites were slightly impaired, likely influenced by reduced stream flows and natural variability since 2019.

Electronic Data Deliverable (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.

For your convenience, links to the required standard templates for reporting the results of your monitoring data are provided below.

If you have any questions about EDD sheets please contact tdec.watershedplanning@tn.gov.
[Publications](#)

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

2025 Benthic Report 317-943.pdf - 07/15/2025 12:49 PM

1087 CEC Brentwood wr_wpu_macroinvert_taxa_report.xlsx - 07/15/2025 12:49 PM

2024 Visual Stream Assessment Response.pdf - 07/15/2025 12:49 PM

2024 VSA Report - City of Brentwood - (CEC Project 317-943).pdf - 07/15/2025 12:49 PM

Comment

NONE PROVIDED

Legal Authority

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

If modifications are made to the legal authority as required by subpart 4.7. a-f that necessitate a new evaluation by a solicitor, a new certification statement must be submitted. If you are unsure if a modification necessitates a new evaluation please contact the Division.

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

Is this a new MS4 or have modifications been made to the legal authority that necessitate a new evaluation by a solicitor (attorney)?
Yes

Attach a signed solicitor’s certification statement.
[Solicitor letter MS4 2025.pdf - 07/22/2025 11:49 AM](#)

Comment

Ordinances were passed August 2024 and a solicitor's statement was submitted last year. Since August 2024 was technically this permit year, we have submitted another solicitor's statement.

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

- [CC Meeting Minutes - Chapter 78.pdf - 07/16/2025 03:07 PM](#)
- [Chapter 56 Tracked Changes.pdf - 07/16/2025 03:07 PM](#)
- [Chapter 56 Ordinance 2024-09.pdf - 07/16/2025 03:07 PM](#)
- [CC Meeting Minutes - Chapter 56.pdf - 07/16/2025 03:07 PM](#)
- [Chapter 78 Tracked Changes.pdf - 07/16/2025 03:07 PM](#)
- [Subdivision Regulations Tracked Changes.pdf - 07/16/2025 03:07 PM](#)
- [Chapter 78 Ordinance 2024-07.pdf - 07/16/2025 03:07 PM](#)
- [PC Chapter 78 and Subregs Meeting Minutes.pdf - 07/16/2025 03:07 PM](#)

Comment

Our stormwater ordinance and subdivision regulations were updated to align with the latest TDEC permit requirements. These updates were approved August 26, 2024.

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

- [City of Brentwood ERP - 2024.pdf - 07/16/2025 10:59 AM](#)
- [City of Brentwood enforcment guide.pdf - 07/16/2025 10:59 AM](#)

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 City’s annual evaluation of its stormwater management program demonstrated that our efforts continue to effectively address and resolve stormwater issues throughout Brentwood. This year, we enhanced our approach to managing construction related violations to help prevent major issues before they occur. Specifically, we increased the number of verbal violations issued and improved their clarity to contractors by incorporating maps, visuals, and more detailed descriptions. These improvements helped construction crews better understand the City’s expectations, resulting in a reduction in the overall number of formal Notices of Violation. We consider this a significant success for the overall quality of stormwater in Brentwood.

In addition, our team increased random and periodic inspections of stormwater control measures (SCMs) throughout the city. These proactive inspections allowed us to identify and correct problems early, improving overall stormwater performance. They also provided valuable opportunities to educate property owners, POA members, and HOA representatives about the City’s expectations for SCM maintenance. We plan to expand the number of random inspections in the coming year to further reduce pollutants in stormwater runoff, mitigate localized flooding risks, and protect our waterways.

Our team also advanced our public education and outreach efforts by participating in and creating new community events. This year, we hosted an educational booth at the City’s annual Arbor Day celebration, where we engaged with residents about key stormwater topics. We plan to continue and expand our presence at this event in future years.

This year, we updated the City’s website to provide more current and useful content for residents, HOAs, POAs, builders, and developers. The updates include a variety of educational brochures, topic pages, GIS portals, and new web pages. Our goal was to make the website more intuitive, helping visitors find the information they need while also learning more about topics they may not have been aware of. As part of these improvements, our team developed a GIS map that displays the locations and details of all active construction sites in the city. The map also allows the public to comment on specific sites via email links, creating more transparency about ongoing development and keeping the community informed. We also created a GIS map dedicated to capital improvement projects, allowing the public to view and stay updated on City projects in progress. Additionally, we refreshed our capital improvements web pages with updated and relevant information. Finally, we launched a new GIS portal for stormwater control measure (SCM) owners to submit their required five-year inspections and annual reports. We are excited about these enhancements and look forward to building on them in the future to improve accessibility, transparency, and public engagement.

Our outreach with HOA members strengthened relationships and created new educational opportunities. In one case, our collaboration with an HOA led to an educational presentation for their members and residents, where we discussed the importance of stormwater management and how SCMs in their neighborhood function and contribute to water quality.

This year, our department worked with Civil & Environmental Consultants (CEC) to complete a visual stream assessment of two streams, as well as perform a benthic macroinvertebrate analysis on all seven streams within the city. Based on the findings of the visual stream assessment, our team investigated and addressed each of the identified areas of concern. These efforts provided opportunities to improve stream quality while also allowing us to engage with residents and property owners about the importance of protecting and maintaining our streams.

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 show that Brentwood's stormwater management program continues to make progress in addressing and resolving stormwater issues throughout the city. Our goal is to improve the program each year, continually refining our efforts to deliver a high level of service to our residents. This year represents a significant step forward and demonstrates how our team is working not just to meet baseline regulatory requirements but to exceed expectations.

Looking ahead, our team plans to propose updated infill development regulations to the municipal code in the upcoming permit cycle. These changes will require best management practices (BMPs) on certain qualifying redevelopment and development projects. As development activity continues to grow in Brentwood, we remain focused on identifying ways to mitigate potential impacts to water quality.

We also plan to host our own stream cleanup event this year for both residents and City staff. We have identified a site where a cleanup will provide immediate and noticeable water quality improvements. With funding now approved, we are partnering with the Harpeth Conservancy to organize and carry out the event. After participating in a stream cleanup with the Cumberland River Compact earlier this year, we were inspired to bring a similar effort directly to our community as part of our ongoing commitment to clean water and environmental protection.

Additionally, our team is evaluating the potential purchase of a dedicated stormwater compliance software platform. We believe leveraging technology is an effective way to enhance compliance efforts and improve overall program efficiency. The software would help automate routine tracking and reporting tasks. As our community continues to grow, so does the complexity and scale of stormwater compliance. This software would help ensure we stay ahead of potential issues by providing a more streamlined and effective way to monitor and track compliance across the city.

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.

[City of Brentwood Illicit Discharge Guide.pdf - 07/16/2025 01:26 PM](#)
[Employee Training - Photo.JPG - 07/16/2025 01:34 PM](#)
[Employee Training - Sign in Sheet.pdf - 07/16/2025 01:34 PM](#)
[Employee Training - Pre-Test Scans.pdf - 07/16/2025 01:34 PM](#)
[Employee Training - Post-Test Scans.pdf - 07/16/2025 01:34 PM](#)
[Employee Training - PD - David Gossett - 2024.pdf - 07/16/2025 01:48 PM](#)
[Employee Training - PD - James Campbell - 2024.pdf - 07/16/2025 01:48 PM](#)
[Employee Training - FD - Jeff Pender - 2024.pdf - 07/16/2025 01:48 PM](#)
[PIE Plan 2024-2025.pdf - 07/24/2025 02:45 PM](#)

Comment
NONE PROVIDED

Attachments

Date	Attachment Name	Context	User
7/24/2025 2:45 PM	PIE Plan 2024-2025.pdf	Attachment	Sarah Totty
7/22/2025 11:49 AM	Solicitor letter MS4 2025.pdf	Attachment	Sarah Totty
7/22/2025 10:55 AM	TNSA Ads - 2024-2025 - Annual Report.pdf	Attachment	Sarah Totty
7/16/2025 3:07 PM	Chapter 78 Tracked Changes.pdf	Attachment	Sarah Totty
7/16/2025 3:07 PM	Subdivision Regulations Tracked Changes.pdf	Attachment	Sarah Totty
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7/15/2025 12:49 PM	1087 CEC Brentwood wr_wpu_macroinvert_taxa_report.xlsx	Attachment	Sarah Totty
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7/8/2025 11:21 AM	Precon YMCA.pdf	Attachment	Sarah Totty
7/8/2025 11:21 AM	PreCon WindyHill Park.pdf	Attachment	Sarah Totty
7/8/2025 11:21 AM	PreCon Meeting Notes Arcadia PH II.pdf	Attachment	Sarah Totty
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7/8/2025 11:21 AM	Precon Reserve at Raintree 7&8.pdf	Attachment	Sarah Totty
7/8/2025 11:21 AM	Precon Walnut Hills.pdf	Attachment	Sarah Totty
7/8/2025 11:21 AM	Elmbrooke HOA - Training PPT.pdf	Attachment	Sarah Totty
7/8/2025 11:21 AM	Elmbrooke HOA - Sign in sheet.pdf	Attachment	Sarah Totty
7/8/2025 11:20 AM	Environmental Education Day - Parent Volunteer information sheet.pdf	Attachment	Sarah Totty
7/8/2025 11:20 AM	Environmental Education Day - Station 10-1.jpg	Attachment	Sarah Totty
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7/8/2025 11:20 AM	Environmental Education Day - Quiz - Information Sheet 2025.pdf	Attachment	Sarah Totty
7/8/2025 11:20 AM	Environmental Education Day - Station 2.jpg	Attachment	Sarah Totty
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7/8/2025 11:20 AM	Environmental Eduaction Day - Feedback.pdf	Attachment	Sarah Totty
7/8/2025 11:20 AM	Environmental Education Day - Deerwood Map.pdf	Attachment	Sarah Totty
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7/8/2025 11:17 AM	Arbor Day - Photo 3.jpg	Attachment	Sarah Totty
7/8/2025 11:17 AM	Arbor Day - Riparian vs Non-Riparian Flyer.pdf	Attachment	Sarah Totty
7/8/2025 11:17 AM	Arbor Day - Why Trees Matter - Flyer.pdf	Attachment	Sarah Totty

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7/8/2025 11:17 AM	Arbor Day - Photo 1.jpg	Attachment	Sarah Totty
7/8/2025 11:17 AM	Arbor Day - Coloring Sheets Flyer.pdf	Attachment	Sarah Totty
7/8/2025 11:17 AM	Arbor Day - Riparian Buffer Flyer - What and Why.pdf	Attachment	Sarah Totty
7/8/2025 11:17 AM	Arbor Day - Photo 4.jpg	Attachment	Sarah Totty
7/8/2025 11:16 AM	CRC Stream Cleanup - 3.JPG	Attachment	Sarah Totty
7/8/2025 11:16 AM	CRC Stream Cleanup - 2.JPG	Attachment	Sarah Totty
7/8/2025 11:16 AM	CRC Stream Cleanup - 1.JPG	Attachment	Sarah Totty
7/8/2025 10:51 AM	TNSA Ads - Payment Receipt.pdf	Attachment	Sarah Totty
7/8/2025 10:49 AM	City Update Newsletter - Fall 2024.pdf	Attachment	Sarah Totty
7/8/2025 10:38 AM	Elmbrooke HOA - Sign in sheet.pdf	Attachment	Sarah Totty
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7/8/2025 10:34 AM	Arbor Day - Photo 1.jpg	Attachment	Sarah Totty
7/8/2025 10:29 AM	Informational Brochure - Stormwater Pollution Surface Cleaning Pamphlet.pdf	Attachment	Sarah Totty
7/8/2025 10:29 AM	Informational Brochure - Water Quality Riparian Buffer.pdf	Attachment	Sarah Totty
7/8/2025 10:29 AM	Informational Brochure - Guide to Detention Pond Maintenance.pdf	Attachment	Sarah Totty
7/8/2025 10:29 AM	Informational Brochure - Illicit Discharge Examples.pdf	Attachment	Sarah Totty
7/8/2025 10:29 AM	Informational Brochure - Landscaping, Gardening & Pest Control.pdf	Attachment	Sarah Totty
7/8/2025 10:29 AM	Informational Brochure - Water Works Construction Guide.pdf	Attachment	Sarah Totty
7/8/2025 10:29 AM	Informational Brochure - TN Litter Law Brochure.pdf	Attachment	Sarah Totty
7/7/2025 4:31 PM	Channel 19 Ads.zip	Attachment	Sarah Totty
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