



State of Tennessee
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER RESOURCES

Johnson City Environmental Field Office
2305 Silverdale Road
Johnson City, Tennessee 37601
Phone: 423-854-5400 Statewide 1-888-891-8332

October 19, 2021

CERTIFIED MAIL RETURN RECEIPT
7019 1120 0000 1631 1067

Honorable Dennis Deal, Mayor
City of Church Hill
e-copy: webmaster@localgovcorp.com
PO Box 366
Church Hill, TN 37642

Subject: **Compliance Evaluation Inspection - Small MS4
National Pollutant Discharge Elimination System
NPDES Permit Tracking No. TNS075701
Church Hill
Hawkins County, Tennessee**

Dear Mayor Deal:

On September 21st, 2021, Brown Patton with the Tennessee Department of Environment and Conservation, Division of Water Resources (Division), conducted a compliance evaluation inspection of the illicit discharge detection elimination program of the Church Hill's Municipal Separate Storm Sewer System (MS4) Program. The purpose of the inspection was to determine compliance with the *NPDES General Permit for Discharges from Small Municipal Separate Storm Sewer Systems* (permit). During the inspection, Division staff met with Steve McLaughlin, Code Enforcement, for the MS4 Program. The inspection included a review of procedures and records.

Minimum Control Measure 3 - Illicit Discharge Detection and Elimination (IDDE) (Permit Section 4.2.3)

The small MS4 permit requires the permittee to develop, implement and enforce a plan to detect and eliminate illicit discharges into the storm sewer system. The permittee must develop and maintain a storm sewer system map, and effectively prohibit, through a regulatory mechanism, non-stormwater discharges into the storm sewer system. The permittee must also implement an appropriate Enforcement Response Plan (ERP), and educate public employees, businesses and the general public concerning the hazards and damage to water quality associated with illicit discharges.

The MS4 has adopted the Stormwater Management Ordinance Chapter 14, Title 301, that prohibits illicit discharges, provided mechanisms for the public to report suspected illicit discharges,

developed a storm sewer system map, and performed employee illicit discharge education. However, the storm sewer system map does not include all outfalls, inputs or the general direction of stormwater flow. Additionally, the MS4's ERP does not include a timeframe for initiating complaint investigations (not to exceed 7 days).

Full implementation of this MCM requires the following:

- Updating storm sewer system map to include all outfalls, inputs, and general direction of stormwater flow
- Revising the ERP to include a time frame (not to exceed 7 days) for initiating complaint investigations

Required Actions:

The Division requests a written response within 30 days of receipt of this letter, describing what steps have or will be taken to address these actions.

Once again, the Division greatly appreciates the time and commitment from your staff in preparation of and during the inspection. Compliance with permit requirements helps ensure discharges are protective of water quality. If you have any questions or concerns with regard to the MS4 permit or this inspection, please contact me at (423) 854-5458 or by E-Mail at Brown.Patton@tn.gov.

Sincerely,



Brown Patton
Division of Water Resources

cc: Steve McLaughlin, Church Hill, Code Enforcement, churchhillcode@gmail.com
Ann Morbitt, Division of Water Resources, Integrated Water Resources Consultant, Ann.Morbitt@tn.gov
Zachary Porter, Division of Water Resources, Environmental Scientist, Zachary.Porter@tn.gov
Joshua Boggan, Division of Water Resources, Program Coordinator, Joshua.Boggan@tn.gov
File Copy