



October 29, 2020

Mr. Brown Patton  
State of Tennessee  
Department of Environment and Conservation  
Division of Water Resources  
Jackson Environmental Field Office  
1625 Hollywood Drive  
Jackson, TN 38305

Dear Mr. Patton,

**RE: CITY OF MARTIN MS4 AUDIT (FILE TNS077607)**

I would like to thank you, Mr. Drake Smarch (TDEC), and Mr. John Lay (TDEC) for conducting a virtual MS4 audit for the City of Martin on August 26, 2020, and for the visit to the City of Martin on August 31, 2020, by Mr. Stephen Miller (TDEC) and Mr. John Lay (TDEC) to conduct the field visits. Our Stormwater Manager, Mr. Mike Brundige, and our Stormwater Consultant, Mr. Tom Lawrence, appreciated the positive feedback your team provided.

On September 25, 2020, you mailed a Municipal Separate Storm Sewer (MS4) Audit letter to the City and requested a response to the five items noted in the "Required Actions" section of the letter by October 30, 2020. Below are the responses documenting the actions that were taken:

- 1) "Revise mapping to include the names of surface water bodies and receiving water" – The names of the surface water bodies and the receiving waters has been added and is now shown on the printed maps.
- 2) "Update ERP to include escalation of enforcement" – Both the ERP (Enforcement Response Plan) and the City of Martin Storm Water ordinance detail the escalation of enforcement process. In order to clarify the method that the City uses for employing the escalation of enforcement process, an "Escalation of Enforcement" process description has been added to the "Section 2: Enforcement Measures" introduction in the ERP.
- 3) "Update ordinance to address design storm and basin requirements for sites discharging to streams with unavailable parameters and ETWs" - In February 2016, the City of Martin adopted the Stormwater Model Ordinance provided by UT MTAS, which was designed to ensure that Phase 2 MS4s like Martin had the necessary regulations in place as required by the TDEC MS4 permit for Small MS4s. In September 2016, TDEC issued a new Construction General Permit

(CGP) with updated regulations, however a new UT MTAS Model Ordinance has not been issued. In order to ensure that the City of Martin has the most effective stormwater ordinance, the City is planning to update its stormwater ordinance once the next TDEC Small MS4 Permit is issued and UT MTAS has developed a Stormwater Model Ordinance based on the Small MS4 Permit. In the interim, the City utilizes the current TDEC Construction regulations regarding sites discharging to streams with unavailable parameters and ETWs.

4) "Update ordinance to clearly identify and include sites that are less than an acre and part of a larger common plan of development that will disturb an acre or greater" - In February 2016, the City of Martin adopted the Stormwater Model Ordinance provided by UT MTAS, which was designed to ensure that Phase 2 MS4s like Martin had the necessary regulations in place as required by the TDEC MS4 permit for Small MS4s. In September 2016, TDEC issued a new Construction General Permit (CGP) with updated regulations, however a new UT MTAS Model Ordinance has not been issued. In order to ensure that the City of Martin has the most effective stormwater ordinance, the City is planning to update its stormwater ordinance once the next TDEC Small MS4 Permit is issued and UT MTAS has developed a Stormwater Model Ordinance based on the Small MS4 Permit. In the interim, the City utilizes the current TDEC Construction regulations regarding sites that are less than an acre and part of a larger common plan of development that will disturb an acre or greater, as documented in the monthly CGP inspections conducted by the City's Stormwater Manager.

5) "Corrective actions to be taken to address the stormwater issues observed at the City's Public Works Garage" – On August 31, 2020, Mr. John Lay of the TDEC Jackson Environmental Field Office (EFO) met with Mr. Mike Brundige of the City of Martin and Mr. Tom Lawrence of TLE at the City of Martin Public Works (PW) Facility. Overall, the facility was well maintained with no observed discharges, however, a few areas that could be improved were identified, as discussed below:

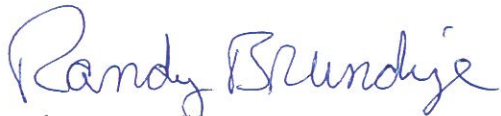
a) Salt Storage: The salt storage area was neat, organized and covered, however, it appeared that runoff from the area to the south of the building could flow along the front of the salt pile. After the inspection, the City met to discuss the salt storage area. The location where the salt is stored is on a raised concrete pad, so that water does not flow through the salt pile, however, some salt had spilled off of the pad in the front where the stormwater flows. The City PW Department decided to rebuild the salt storage bin and to add a door, so that the salt would not be exposed to stormwater, while still easy to access. Construction began in October 2020 and is expected to be completed soon. The salt is stored in an upgradient location covered with tarps pending completion of the construction.

b) Wash Area Drainage: The drainage from the vehicle wash area was underground and appeared to be connected to the sanitary sewer, however, there was a drain along the south side of the facility that had a pipe connected to it, yet it was also open to stormwater. The City investigated the area and the source of the drainage into the pipe was unclear. Therefore, the City decided to quickly address the possible issue by installing

a connection from the vehicle wash drain to the existing sanitary sewer and to cap the pipe on the upstream side. The City will continue to investigate the storm drain identified during the inspection to map the inputs to the storm drain to ensure that cross connections do not exist.

c) Materials Storage: Containers that appeared to contain chemicals were stored in a covered shed, however, there was evidence that stormwater runoff could flow through the area where the containers were stored. There was no sign that chemicals had been discharged. The PW staff decided to take the containers out of the shed and to put them inside the work building until such time as the shed could be reconstructed or the stormwater diverted.

Please contact the City's Stormwater Manager, Mr. Mike Brundige, at 731-587-3126 if you have any questions or would like to meet to further discuss the City's Stormwater Program.



The Honorable Randy Brundige  
City of Martin  
109 University Street  
Martin, TN 38237

CC: Mr. Mike Brundige (City of Martin Stormwater Program)  
Thomas B. Lawrence, PE (TLE, PLLC)