



State of Tennessee
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER RESOURCES
Knoxville Environmental Field Office
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February 21, 2023

CERTIFIED MAIL RETURN RECEIPT
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Honorable Tanya Martin, Mayor
City of Alcoa
e-copy: tmartin@cityofalcoa-tn.gov
223 Associates Boulevard
Alcoa, TN 37701

Subject: **Compliance Evaluation Inspection – Small MS4
National Pollutant Discharge Elimination System
NPDES Permit Tracking No. TNS075132
City of Alcoa
Alcoa, Blount County, Tennessee**

Dear Mayor Martin:

On January 18, 2023, Valerie McFall, with the Tennessee Department of Environment and Conservation, Division of Water Resources (Division), conducted a compliance evaluation inspection of the construction stormwater runoff program of the City of Alcoa'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 Roger Fields, Stormwater Coordinator, and John Clay Garland, Development Services Inspector, for the MS4 Program. The inspection included a review of procedures and records, as well as observation of MS4 staff as they performed an inspection of projects covered under the local construction stormwater runoff program.

Minimum Control Measure 4 – Construction Site Stormwater Runoff Control (Permit Section 4.2.4)

The small MS4 permit requires the development, implementation, and enforcement of a program to reduce pollutants in stormwater runoff to the stormwater system from construction activities that result in land disturbance of greater than or equal to one acre, or less than one acre if part of a larger common plan of development. In part, this minimum control measure includes an ordinance or other regulatory mechanism to require erosion prevention and sediment controls (EPSCs), sanctions to enforce compliance, specific procedures for construction site plan review and approval, as well as specific procedures for priority construction activities, permittee inspection and compliance documentation.

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The MS4 has adopted the Stormwater Management Ordinance 13-304, Title 16, Chapter 5, that controls construction stormwater discharges, and established a plans review process and inspection program for construction projects. The MS4's plans review procedures included evaluation of EPSCs and specific Construction General Permit (CGP) technical standards. At a minimum the MS4 review process should include documentation of the following procedures and technical standards:

- a determination of discharges into waters with unavailable parameters or exceptional Tennessee waters;
- design storm (2-yr/24 hr and 5-yr/24 hr) consistent with the CGP;
- sediment basin for drainage areas (10 acres and 5 acres) consistent with the CGP; and
- construction buffer requirements (15-ft/30-ft and 30-ft/60-ft) consistent with the CGP.

The MS4 has established a plans review process and inspection program for construction projects. Plans review procedures included documented evaluation of EPSCs and specific *Tennessee General NPDES Permit for Discharges of Stormwater Associated with Construction Activities* (CGP) technical standards. Site inspection procedures were evaluated by performing a visit to Clover Ridge, TNR136459 and Marconi Corner, TNR136857 construction sites. The MS4's inspector, John Clay Garland, demonstrated a working knowledge of erosion prevention and sediment control practices, and performed and documented a comprehensive site inspection.

This MCM has been developed and implemented.

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 Valerie McFall at 865-606-3696 or by E-Mail at Valerie.McFall@tn.gov.

Sincerely,



Valerie McFall
Environmental Consultant

cc: Mark Johnson, City Manager, mjohnson@cityofalcoa-tn.gov
Roger Fields, City of Alcoa, Stormwater Coordinator, rfields@cityofalcoa-tn.gov
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