

**From:** [Leean Tupper](#)  
**To:** [Water Permits](#)  
**Cc:** [Terry Frank](#)  
**Subject:** Anderson County - MS4 Annual Report  
**Date:** Thursday, September 27, 2018 10:02:08 AM  
**Importance:** High

---

**\*\*\* This is an EXTERNAL email. Please exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email - STS-Security. \*\*\***

Anderson County's MS4 Annual Report is attached.  
Please acknowledge receipt of our report.

Thank you,

-- Leean R. Tupper  
Assistant to the County Mayor  
Certified Public Administrator

Anderson County Government  
100 North Main Street, Suite 208  
Clinton, TN 37716-3617  
Phone: (865) 457-6200  
FAX: (865) 264-6270



Tennessee Department of Environment and Conservation  
Division of Water Resources  
William R. Snodgrass Tennessee Tower,  
312 Rosa L. Parks Avenue, 11th Floor, Nashville, Tennessee 37243  
1-888-891-8332 (TDEC)

Phase II Small Municipal Separate Storm Sewer System (MS4) Annual Report

1. MS4 Information

Name of MS4: Anderson County	MS4 Permit Number: TNS075108	
Contact Person: Danny Phillips, Stormwater Coordinator	Email Address: dphillips@andersontn.org	
Telephone: (865) 457-5400	MS4 Program Web Address: <a href="http://www.anderson-county.com/mayor/planninganddevelopment/storm-water/">www.anderson-county.com/mayor/planninganddevelopment/storm-water/</a>	
Mailing Address: 100 N. Main Street		
City: Clinton	State: Tennessee	ZIP code: 37716

What is the current population of your MS4? ~3000

What is the reporting period for this annual report? July 1 2017 to June 30 2018

2. Discharges to Waterbodies with Unavailable Parameters or Exceptional Tennessee Waters (Section 3.1)

- A. Does your MS4 discharge into waters with unavailable parameters (previously referred to as impaired) for pathogens, nutrients, siltation or other parameters related to stormwater runoff from urbanized areas as listed on TN's most current 303(d) list and/or according to the on-line state GIS mapping tool ([tdeconline.tn.gov/dwr/](http://tdeconline.tn.gov/dwr/))? If yes, attach a list. ☒ Yes ☐ No
- B. Are there established and approved TMDLs (<http://www.tn.gov/environment/article/wr-ws-tennessees-total-maximum-daily-load-tmdl-program>) with waste load allocations for MS4 discharges in your jurisdiction? If yes, attach a list. ☒ Yes ☐ No
- C. Does your MS4 discharge to any Exceptional Tennessee Waters (ETWs - [http://environment-online.tn.gov:8080/pls/enf\\_reports/f?p=9034:34304:4880790061142](http://environment-online.tn.gov:8080/pls/enf_reports/f?p=9034:34304:4880790061142))? If yes, attach a list. ☐ Yes ☒ No
- D. Are you implementing specific Best Management Practices (BMPs) to control pollutant discharges to waterbodies with unavailable parameters or ETWs? If yes, describe the specific practices: Priority construction sites are established if sites discharge to impaired waterways. Increased inspection frequency of priority construction sites should reduce impacts to waters with unavailable parameters. ☒ Yes ☐ No

3. Public Education/Outreach and Involvement/Participation (Sections 4.2.1 and 4.2.2)

- A. Have you developed a Public Information and Education plan (PIE)? ☒ Yes ☐ No
- B. Is your public education program targeting specific pollutants and sources, such as Hot Spots? If yes, describe the specific pollutants and/or sources targeted by your public education program: This fiscal year was devoted to educating automotive businesses deemed as Hotspots. Educational materials and meetings with operators focused on reducing illicit discharges from auto repair operations within the jurisdictional area. This should reduce gasoline and oil discharges to applicable waterways. ☒ Yes ☐ No
- C. Do you have a webpage dedicated to your stormwater program? If yes, provide a link/URL: [www.anderson-county.com/mayor/planninganddevelopment/storm-water/](http://www.anderson-county.com/mayor/planninganddevelopment/storm-water/) ☒ Yes ☐ No



Phase II Small Municipal Separate Storm Sewer System (MS4) Annual Report

- D. Summarize how you advertise and publicize your public education, outreach, involvement and participation opportunities: At this time Anderson County relies on event advertising, and simply attends 6 events per year. A social media outlet may be used in the future to help advertise outreach opportunities.
- E. Summarize the public education, outreach, involvement and participation activities you completed during this reporting period: Anderson County recently created a formal PIE plan that includes 6 events per year in addition to ongoing Hotspot education and municipal employee training. MS4 staff attended the Anderson County Hazardous Waste Collection event and handed out pamphlets and contact information to local residents.
- F. Summarize any specific successful outcome(s) (e.g., citizen involvement, pollutant reduction, water quality improvement, etc.) fully or partially attributable to your public education and participation program during this reporting period: Anderson County has observed an increase in citizen involvement and public awareness as a result of community participation in outreach events. These net benefits were identified via an increase in citizen engagement identified in phone calls to the County Stormwater Office.

4. Illicit Discharge Detection and Elimination (Section 4.2.3)

- A. Have you developed and do you continue to update a storm sewer system map that shows the location of system outfalls where the municipal storm sewer system discharges into waters of the state or conveyances owned or operated by another MS4? ☒ Yes ☐ No
- B. If yes, does the map include inputs into the storm sewer collection system, such as the inlets, catch basins, drop structures or other defined contributing points to the sewershed of that outfall, and general direction of stormwater flow? ☒ Yes ☐ No
- C. How many outfalls have you identified in your storm sewer system? Initial mapping efforts have only documented outfalls from roads intersecting with streams. 22 documented outfalls have been recorded to date, and a comprehensive mapping effort is planned for Fall 2018.
- D. Do you have an ordinance, or other regulatory mechanism, that prohibits non-stormwater discharges into your storm sewer system? ☒ Yes ☐ No
- E. Have you implemented a plan to detect, identify and eliminate non-stormwater discharges, including illegal disposal, throughout the storm sewer system? If yes, provide a summary: A formal IDDE plan has been developed and adopted in the aftermath of an audit conducted in Spring of 2018. A dry weather screening process has been initiated and Anderson County is just starting to conduct the first efforts to eliminate illicit discharges to the storm drainage system. ☒ Yes ☐ No
- F. How many illicit discharge related complaints were received this reporting period? 0
- G. How many illicit discharge investigations were performed this reporting period? 0
- H. Of those investigations performed, how many resulted in valid illicit discharges that were addressed and/or eliminated? 0

5. Construction Site Stormwater Runoff Pollutant Control (Section 4.2.4)

- A. Do you have an ordinance or other regulatory mechanism requiring:
- Construction site operators to implement appropriate erosion prevention and sediment control BMPs consistent with those described in the TDEC EPSC Handbook? ☒ Yes ☐ No
- Construction site operators to control wastes such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste? ☒ Yes ☐ No



## Phase II Small Municipal Separate Storm Sewer System (MS4) Annual Report

- Design storm and special conditions for unavailable parameters waters or Exceptional Tennessee Waters consistent with those of the current Tennessee Construction General Permit (TNR100000)? ☒ Yes ☐ No
- B. Do you have specific procedures for construction site plan (including erosion prevention and sediment BMPs) review and approval? ☒ Yes ☐ No
- C. Do you have sanctions to enforce compliance? ☒ Yes ☐ No
- D. Do you hold pre-construction meetings with operators of priority construction activities and inspect priority construction sites at least monthly? ☒ Yes ☐ No
- E. How many construction sites disturbing at least one acre or greater were active in your jurisdiction this reporting period? 2
- F. How many active priority and non-priority construction sites were inspected this reporting period? 2
- G. How many construction related complaints were received this reporting period? 5
6. Permanent Stormwater Management at New Development and Redevelopment Projects (Section 4.2.5)
- A. Do you have a regulatory mechanism (e.g. ordinance) requiring permanent stormwater pollutant removal for development and redevelopment projects? If no, have you submitted an Implementation Plan to the Division? ☐ Yes ☒ No
- B. Do you have an ordinance or other regulatory mechanism requiring:
- Site plan review and approval of new and re-development projects? ☒ Yes ☐ No
- A process to ensure stormwater control measures (SCMs) are properly installed and maintained? ☒ Yes ☐ No
- Permanent water quality riparian buffers? If yes, specify requirements: \_\_\_\_\_ ☐ Yes ☒ No
- C. What is the threshold for development and redevelopment project plans plan review (e.g., all projects, projects disturbing greater than one acre, etc.)? 1 acre
- D. How many development and redevelopment project plans were reviewed for this reporting period? 0
- E. How many development and redevelopment project plans were approved? 0
- F. How many permanent stormwater related complaints were received this reporting period? 0
- G. How many enforcement actions were taken to address improper installation or maintenance? 0
- H. Do you have a system to inventory and track the status of all public and private SCMs installed on development and redevelopment projects? ☒ Yes ☐ No
- I. Does your program include an off-site stormwater mitigation or payment into public stormwater fund? If yes, specify. \_\_\_\_\_ ☐ Yes ☒ No
7. Stormwater Management for Municipal Operations (Section 4.2.6)
- A. As applicable, have stormwater related operation and maintenance plans that include information related to maintenance activities, schedules and the proper disposal of waste from structural and non-structural stormwater controls been developed and implemented at the following municipal operations:
- Streets, roads, highways? ☐ Yes ☒ No
- Municipal parking lots? ☐ Yes ☒ No

Phase II Small Municipal Separate Storm Sewer System (MS4) Annual Report

Maintenance and storage yards?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Fleet or maintenance shops with outdoor storage areas?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Salt and storage locations?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Snow disposal areas?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Waste disposal, storage, and transfer stations?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

B. Do you have a training program for employees responsible for municipal operations at facilities within the jurisdiction that handle, generate and/or store materials which constitute a potential pollutant of concern for MS4s?

☒ Yes ☐ No

If yes, are new applicable employees trained within six months, and existing applicable employees trained and/or retrained within the permit term?

☒ Yes ☐ No

8. Reviewing and Updating Stormwater Management Programs (Section 4.4)

A. Describe any revisions to your program implemented during this reporting period including but not limited to:

Modifications or replacement of an ineffective activity/control measure. Formal IDDE, ERP, PIE, and Permanent Stormwater plans were all developed, adopted, and initiated during this reporting period. PPGH plans will be developed and initiated in FY19 and will actively control stormwater issues in Anderson County.

Changes to the program as required by the division to satisfy permit requirements. An audit in late March required the formalization of PIE, IDDE, ERP, Construction, Post-Construction, and PPGH before October 30, 2018. While most of these benchmarks have been met, PPGH is the final requirement from the audit. All of these program components have been initiated, and Anderson County expects to have great success using these new protocols.

Information (e.g. additional acreage, outfalls, BMPs) on newly annexed areas and any resulting updates to your program. Recent NOI included pulling jurisdictional area back to UA only; this reduced the jurisdictional area from 345 square miles to 16.33 square miles. The reduction in regulated area will make the success of this program more probable and attainable.

B. In preparation for this annual report, have you performed an overall assessment of your stormwater management program effectiveness? If yes, summarize the assessment results, and any modifications and improvements scheduled to be implemented in the next reporting period. The TDEC audit was the basis for the assessment of effectiveness, and the formalization and streamlining of the stormwater program has allowed Anderson County to make attainable goals for every aspect of the program.

☒ Yes ☐ No



9. Enforcement Response Plan (Section 4.5)

- A. Have you implemented an enforcement response plan that includes progressive enforcement actions to address non-compliance, and allows the maximum penalties specified in TCA 68-221-1106? If no, explain. \_\_\_\_\_ ☒ Yes ☐ No
- B. As applicable, identify which of the following types of enforcement actions (or their equivalent) were used during this reporting period; indicate the number of actions, the minimum measure (e.g., construction, illicit discharge, permanent stormwater management), and note those for which you do not have authority:

<u>Action</u>	<u>Construction</u>	<u>Permanent Stormwater</u>	<u>Illicit Discharge</u>	<u>In Your ERP?</u>	
Verbal warnings	#3	#0	#0	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Written notices	#2	#0	#0	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Citations with administrative penalties	#0	#0	#0	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Stop work orders	#0	#0	#0	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Withholding of plan approvals or other authorizations	#0	#0	#0	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Additional Measures	#0	#0	#0	Describe: <u>NA</u>	

- C. Do you track instances of non-compliance and related enforcement documentation? ☒ Yes ☐ No
- D. What were the most common types of non-compliance instances documented during this reporting period?  
Sediment in road, and EPSC measures in disrepair.

10. Monitoring, Recordkeeping and reporting (Section 5)

- A. Summarize any analytical monitoring activities (e.g., planning, collection, evaluation of results) performed during this reporting period. No analytical monitoring was planned for this reporting period.
- B. Summarize any non-analytical monitoring activities (e.g., planning, collection, evaluation of results) performed during this reporting period. No non-analytical monitoring was planned for this reporting period.
- C. If applicable, are monitoring records for activities performed during this reporting period submitted with this report. ☐ Yes ☒ No


11. Certification

Phase II Small Municipal Separate Storm Sewer System (MS4) Annual Report

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 6.7.2 of the permit.

*"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."*

Mayor Terry Frank  
Printed Name and Title

  
Signature

9-27-18  
Date

Annual reports must be submitted by September 30 of each calendar year (Section 5.4) to the appropriate Environmental Field Office (EFO), identified in the table below:

EFO	Street Address	City	Zip Code	Telephone
Chattanooga	1301 Riverfront Pkwy, Suite 206	Chattanooga	37402	(423) 634-5745
Columbia	1421 Hampshire Pike	Columbia	38401	(931) 380-3371
Cookeville	1221 South Willow Ave.	Cookeville	38506	(931) 520-6688
Jackson	1625 Hollywood Drive	Jackson	38305	(731) 512-1300
Johnson City	2305 Silverdale Road	Johnson City	37601	(423) 854-5400
Knoxville	3711 Middlebrook Pike	Knoxville	37921	(865) 594-6035
Memphis	8383 Wolf Lake Drive	Bartlett	38133	(901) 371-3000
Nashville	711 R S Gass Boulevard	Nashville	37216	(615) 687-7000

Anderson County MS4  
2017-2018 Annual Report Supplement

2.A) Discharges to Impaired Waters (Jurisdictional Area)

Waterbody	HUC	Impairment
Coal Creek	06010207029	E. Coli, Phosphorus
Clinch River	06010207019	Temperature
Hinds Creek	06010207016	E. Coli
Buffalo Creek	06010207016	Nitrate/Nitrite, Phosphorus, E. Coli
Melton Hill Reservoir	06010207006	Chlordane, PCBs
Poplar Creek	06010207026	Nitrate/Nitrite, Phosphorus

2.B) TMDLs

Waterbody	HUC	Pollutant of Concern
Lower Clinch River	06010207	PCBs, Chlordane (2010)
Lower Clinch River	06010207	E. Coli (2017)
Lower Clinch River	06010207	Siltation, Habitat Alteration (2006)