

**CITY OF MILLINGTON
PLANNING & ENGINEERING**

7930 Nelson Road
Millington, Tennessee 38053

Office: 901.873.5701
Fax: 901.873.4113

www.millingtontn.gov



October 9, 2019

Joellyn Brazile
State of Tennessee
Division of Water Resources
8383 Wolf Lake Drive
Bartlett, TN 38133

Subject: Notice of Violation

City of Millington Small Municipal Separate Storm Sewer System (MS4) Audit
National Pollutant Discharge Elimination System Tracking Number TNS075442
Millington, Shelby County, Tennessee

Joellyn Brazile

On July 30th & 31st 2019, The Tennessee Department of Environment and Conservation, Division of Water Resources conducted an audit of the Millington MS4 Program. The audit yielded nine action items which need to be corrected to provide a more comprehensive Stormwater Program. The City of Millington has taken the findings from this audit and compiled a list of all nine action items with short narratives to demonstrate the current action the City of Millington is taking to correct each item. Below is a list of those action items & corrective measures. As we complete the nine action items listed below, we will be in constant contact with you and your office to make sure you have an opportunity to review the final product before our Board of Mayor & Alderman take any action and these changes have been fully implemented into the Millington Stormwater Program.

Required Action # 1

Update the PIE plan to reflect all current education and outreach events, activities and targeted campaigns.

The City is working on updating the PIE plan to reflect all internal and external outreach events. The City has contacted the Keep Tennessee Beautiful organization to investigate becoming a local affiliate. Through this organization, the City plans to hold additional community clean-up events with a stormwater focus.

Required Action # 2

Track and maintain documentation of all public education and outreach components as well as evaluations of overall PIE plan effectiveness and the need for improvement.

The City has developed an "Outreach Record and Evaluation Form" and added that as an Appendix to the PIE plan. The plan has been modified to note that a form should be prepared and saved for each outreach event. A record was created for the most recent outreach event, the City's Goat Days Festival, which was held in September 2019. Information on this record will be used during the planning of next year's event.

An Equal Opportunity
Affirmative Action Municipality



*See attached completed sample outreach form.

Required Action # 3

Develop and implement methods for promoting public participation in stormwater-related events and opportunities for involvement.

The City has developed a schedule for public outreach that includes the following elements:

- Monthly social media messaging through the Tennessee Stormwater Association
- Keep Millington Beautiful clean-up events, focusing the events on stormwater-related cleanup. To date, the City has contacted Keep Tennessee Beautiful about becoming an affiliate member.
- Farmer's Market and Goat Days outreach booths. In addition to general information, the booths will have a "point of emphasis" for each session.

*See attached 2020 Public Outreach schedule.

Required Action # 4

Revise the City's storm water management plan to include procedures to be followed and implemented to investigate portion of the MS4 jurisdiction that, based on the results of field screening or other identification programs, indicate a reasonable potential of containing illicit discharges.

The City is currently reviewing its "Standard Operating Procedures for Illicit Discharge Detection" document to include actions to be taken following detection and reporting of the illicit discharge. The City plans to have the new procedures in place and ready for TDEC review by the end of October 2019.

Required Action # 5

Revise and finalize the city's ordinance to include the items listed in the attached audit report.

The City is finalizing changes to the City ordinances based on the comments provided and plans to have them implemented by the end of 2019. The City is currently also revising its ordinances with respect to ADA guidelines, and would like to review and pass all ordinance modifications at the same time.

Required Action # 6

Develop and implement specific operation and maintenance plans for each applicable municipal operation.

1. The City is developing an aerial map of the Public Works facility to identify each of the functional areas on the property.
2. The City is developing a SWPPP for the Public Works facility. The SWPPP is being based on a similar plan prepared by the Shelby County Public Works Department and will include the following elements:
 - a. Description of the different functional areas on the property



- b. Description of operations and how each can impact stormwater
- c. Education plan for staff
- d. Log forms for incidents and maintenance activities

The SWPPP draft document is planned to be completed in October 2019. When complete, it will be rolled out to the Public Works staff and a training session held by the end of 2019.

*See attached draft SWPPP document.

Required Action # 7

Implement an employee training program for employees responsible for municipal operations.

The City has developed a schedule for employee training to be implemented in 2020. During the remainder of 2019, training materials to be used in these sessions will be developed. A total of four training sessions will be held each year, on a quarterly basis. Sessions in January and July will be geared towards new employees. Sessions in April and October will be geared towards existing employees. All City of Millington employees must participate in one training session every 5 years, regardless of their job function.

*See attached 2020 Employee Training Schedule.

Required Action # 8

Corrective actions addressing the stormwater issue observed and discussed at the City's Public works facility.

1. The City has ordered Spill Kits to be placed at the facility for rapid response to future incidents.
2. The City has ordered large temporary drip plans to be placed under vehicles on the lot that are awaiting maintenance or repair.

Required Action # 9

Maintain documentation of operation and maintenance activities.

1. The City has contracted with Dude Solutions to provide tracking (via ticketing and reports) for incoming phone calls to City Hall regarding requests for Public works maintenance, spill cleanups, or other public requests. The contract is still in implementation and testing mode and is not yet active.
2. The City will use an email account (cityofmillington@gmail.com) to send weekly emails to Public Works supervisors requesting a description of all maintenance activities that have occurred in the last week. The emails will be scheduled in advance and automated. Replies to the emails will be saved and recorded.
3. The City is creating an online form (via Google Forms or similar service) that can be linked in the weekly maintenance emails to supervisors. The goal is to make the reporting process as simple as possible so that supervisors will not view it as a burden. See attached completed response form and link to online form - <https://forms.gle/5XAaJm2ufMP6bL3B8>
4. The City is developing paper forms to record and document the following:

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- a) Public Outreach. To be included in the PIE plan and completed in October 2019. A draft form is already complete.
- b) Public Works Facility SWPPP Incident and Maintenance forms. To be completed in October 2019.

Thank you for all the assistance you and your department have provided to the City of Millington. If you have any additional questions, my contact information is below.

Respectfully,

A handwritten signature in black ink, appearing to read "Jason Dixon".

Jason Dixon
City of Millington
901-461-8595
j.dixon@millingtontn.gov

#1



Public Information and Education Plan
for the City of Millington
Stormwater Management Program

PUBLIC INFORMATION AND EDUCATION PLAN

I. PURPOSE

The purpose of developing and implementing the Public Information and Education (PIE) Plan is to improve the quality of and reduce the quantity of urban runoff, resulting in the receiving waters meeting their designated uses.

II. GOALS AND OBJECTIVES

The primary goal of the Millington PIE Plan is to increase awareness of stormwater pollution impacts and to encourage changes in public behavior. The goals of the PIE Plan are derived from the requirements of the Small MS4 General Permit, focusing on impacts of stormwater discharges to water bodies and the steps that the public can take to reduce pollutants in stormwater runoff. Specific goals of the PIE Plan are as follows:

- Improve the quality of stormwater runoff from existing urban areas
- Improve the quality of stormwater runoff from all new development and redevelopment projects
- Identify and eliminate all unpermitted and/or illicit discharges to the stormwater system
- Create an atmosphere of public awareness concerning the negative impacts of polluted and/or excessive volumes of stormwater runoff

The objectives are the heart of the PIE Plan. They are based on the goals and target audience needs and result in an orchestrated set of educational activities that are focused and effective. Well written and designed objectives will result in measurable outcomes upon which the program's evaluation will be based.

III. REGULATORY REQUIREMENTS

The Small MS4 General Permit contains minimum requirements for the Public Education and Outreach program in Section 4.2.1 of the permit. The permit requires that the program target specific pollutants and sources that may cause or contribute to impairment. In areas known as hotspots, the MS4 must focus education and outreach on those particular pollutants of concern. This section of the permit requires that this PIE Plan be developed by the end of the first year of permit coverage. The plan is to detail specific goals and specific activities that will occur over the remainder of the permit cycle. The plan must incorporate components from outreach campaigns and one on one communications and shall incorporate a mode to evaluate the plan's effectiveness, so adjustments can be made if necessary. The plan must also include targeted educational campaigns addressing the following issues:

- a. General public awareness on the impacts of water quality from general housekeeping maintenance and activities.
- b. Home owner associations and other operators of permanent BMPs awareness of the importance of maintenance activities.

- c. Local engineering and development community awareness of the stormwater ordinances, regulations, and guidance materials related to long-term water quality impacts.
- d. General public and professional chemical applicators awareness on the proper storage, use, and disposal of pesticides, herbicides, and fertilizers.
- e. General public and professional chemical applicators awareness on the proper storage, use, and disposal of oil and other automotive-related fluids.
- f. General public and municipal employees on the awareness of identifying and reporting procedures for illicit connections/discharges, sanitary sewer seepage, spills, etc.
- g. Local engineering, development, and construction community awareness of stormwater ordinances, regulations and guidance materials related to construction phase water quality impacts; and
- h. Municipal employee/contractor awareness of water quality impacts from daily operations

The permit requires MS4s to track and maintain records of all public education and outreach activities. A form for tracking outreach activities and evaluating their effectiveness is included in Appendix A. A copy of this form should be completed and saved for each outreach activity.

IV. TARGET AUDIENCES

Stormwater information and education programs must be broad based and intensive enough to reach all parts of the city population. They require a long-term investment in developing the knowledge, skills, attitudes and behaviors needed for widespread adoption of new stormwater management practices. Everyone's participation is needed because the different sources of stormwater pollutants are so common and widespread. Examples of the target audiences that must be reached by the educational efforts of the city are as follows:

A. GENERAL PUBLIC

The general public consists of all people living and working within the permit area. The following objectives are considered to be crucial for the general public to understand for the overall success of the stormwater management program.

- a. The general public will understand the impacts of stormwater and why it is important to decrease stormwater runoff, improve water quality, and the detrimental effects of impervious area on runoff. They will understand the impacts on water quality from general housekeeping maintenance/activities.
- b. The general public will know where to get information on Best Management Practices (BMPs) and will understand how to use appropriate BMPs at their home or business.
- c. The general public will understand where storm drains discharge and will not dump pollutants into them.
- d. The general public will understand what materials can be considered pollutants and will not place them where they have the potential to enter the stormwater drainage

system.

- e. The general public will see BMPs as necessary, functional, and marketable.
- f. The general public will know whom to call when someone is violating performance standards or the Millington Stormwater Management Ordinance, including illicit connections/discharges, sanitary sewer seepage, spills, etc.
- g. The general public and professional chemical applicators will be aware of the proper storage, use, and disposal of pesticides, herbicides, and fertilizer use.
- h. The general public and professional chemical applicators will be aware of the proper storage, use, and disposal of oil and other automotive-related fluids.

B. HOMEOWNERS, LANDLORDS, AND SMALL BUSINESS OWNERS

Property owners and managers need specific knowledge and skills in order to implement practices that improve the quality and reduce the quantity of stormwater runoff. Small business owners are considered those that are responsible for the management of their own parking lot and landscaping. The following objectives apply to homeowners, landlords, and small business owners:

- a) During retrofitting and redevelopment, homeowners, landlords, and small business owners will install practices to decrease volume and peak flows and improve water quality.
- b) Homeowners, landlords, and small business owners will choose contractors who have a proven track record of meeting or exceeding stormwater management standards. There will be increased demand for quality developments that meet performance standards including reducing imperviousness and increasing infiltration.
- c) Homeowner associations and other operators of permanent BMPs will have an awareness of the importance of the maintenance activities.

C. CONSULTANTS, DEVELOPERS, HOME BUILDERS AND CONTRACTORS

Those individuals who plan and implement land developments and who are involved in new construction and redevelopments shall meet the following objectives:

- a) Homeowners and their contractors will understand the importance of using effective BMPs and will properly install and maintain said BMPs.
- b) Consultants and developers will know stormwater rules and the regulatory process.
- c) Consultants will prepare designs that meet or exceed performance standards.
- d) Consultants will provide accurate information to developers and municipalities on practices to meet standards including innovative practices and new science/engineering techniques.
- e) Consultants and developers will design construction sites to minimize erosion and stormwater runoff. Contractors and builders will install and maintain these erosion control and stormwater management BMPs.
- f) Developers will market developments based in part on stormwater compliance and benefits of the stormwater management practices.

- g) Homebuilders will follow plans and not interfere with site stormwater and erosion controls and will follow construction sequencing plans to protect stormwater quality and prevent regulatory concerns.

D. MUNICIPALITIES AND MUNICIPAL STAFF

The following objectives refer to professional, career staff employed by the City of Millington. This includes those employed in public works, water and sewer, planning, zoning, parks, and other departments with land use and land management responsibilities.

- a) Municipal staff and consultants will be able to evaluate BMPs for effectiveness.
- b) Municipality will hire engineering firms that understand and use proper stormwater retrofitting.
- c) Municipality will communicate standards to landowners, developers, contractors, and consultants.
- d) Municipality will review plans and enforce standards in plans.

E. ELECTED / APPOINTED OFFICIALS

Elected / appointed political officials, especially those serving on land use, and zoning committees, have unique educational needs that will allow them to make policy and legal decisions regarding the stormwater program. Objectives for elected and appointed officials within the city are as follows:

- a) Officials will understand the stormwater program requirements and objectives well enough to make informed decisions regarding policy.
- b) Officials will have an understanding of the different stormwater management BMPs and how their implementation will impact both the development community and the municipal staff.

V. SPECIFIC ACTIONS

Reaching out to the target audiences described in the preceding section will require coordinated, long-term efforts involving multiple city departments. This section lists specific educational activities that will be carried out by the city to reach each of the designated target audiences.

A. GENERAL PUBLIC

Education of the general public is a crucial part of managing a successful stormwater educational program. The city shall strive to find every opportunity to provide educational materials to the general public that educate the public both on general water quality issues and on specific water quality issues, such as illicit discharges and

pesticide or fertilizer use. At a minimum, the city will perform the following tasks to educate the general public:

1. City Website – www.millingtontn.gov

The City website will include educational materials such as public service announcements that can be viewed by the general public. The website will also provide information regarding illicit discharges and a mechanism for reporting by the general public.

Measurable Goals

Year 1-5 – Maintain and keep up to date

2. International Goat Days Family Festival

The annual Goat Days Festival is a Millington tradition and takes place in early September each year. The event is widely attended by the public.

The City will maintain a Stormwater Information booth at the festival, providing literature and educational material to attendees.

Measurable Goals

Year 1-5 – Continue annual participation in the festival

3. TNSA Media Outreach

The City of Millington will partner with the Tennessee Stormwater Association (TNSA) to broadcast stormwater educational advertisements on public radio stations and on social media platforms.

Measurable Goals

Year 1-5 – Publish monthly advertisement on local public radio stations

Year 1-5 – Publish monthly advertisement on Facebook (social media)

B. HOMEOWNERS, LANDLORDS, AND SMALL BUSINESS OWNERS

The education of homeowners, landlords, and small business owners will generally be more specific than the educational efforts for the general public. While there is a good bit of overlap in the efforts, these entities will be targeted with educational materials that are specific to their undertaking. Efforts that will be performed for these entities are as follows:

1. Industrial and Commercial Facilities Inspection

The Public Works Department will inspect all industrial and commercial facilities to ensure that all stormwater requirements are understood. This item includes a one on one educational aspect with all of the business public in the city. Even many businesses that have no stormwater regulatory requirements are educated on what they can do at their facility to help improve stormwater quality, in general.

Measurable Goals

Years 1-5 – Inspect 100% of existing and new commercial and industrial businesses

2. Property Maintenance Materials

Equally important for property owners to understand is the importance of proper management of chemicals such as pesticides, herbicides, fertilizers, oils, and other automotive fluids. Education of this manner will be approached in a variety of ways. General educational materials will be made available to the public that may be performing this type of property maintenance on their own. This will primarily be accomplished in the form of public service announcements. The city will also target professional users of these types of chemicals with a specific educational message. This message will be performed in more of a one-on-one format in the form of the commercial facilities inspections.

Measurable Goals

Year 1 – Continue inspections of commercial properties; collect and/or produce educational materials directed specifically at the use of chemicals such as pesticides, herbicides, fertilizers, and automotive fluids.

Years 2-5 – Continue inspections of commercial properties; begin distribution / publication of educational materials

C. CONSULTANTS, DEVELOPERS, HOME BUILDERS AND CONTRACTORS

1. Development Meetings

The City will hold annual meetings with the construction and development community to inform and to gather input on the stormwater program. These meetings will be used as an avenue to inform contractors and developers of

proposed changes in the stormwater program. They will also be used as a means of receiving public input on proposed changes to the program.

Measurable Goals

Years 1-5 – Hold one meeting each year of permit coverage.

2. Construction BMP Handouts

Proper selection and installation of best management practices on construction sites is critical to protecting the water quality of waters entering the MS4 and waters of the state. The City will maintain educational materials that can be given to those involved with construction sites that describes the types of management practices typically used on construction sites and how these practices are properly and most effectively used.

Measurable Goals

Years 1-5 – Make educational materials available to the development and construction public which describe the proper use of management practices on construction sites.

D. MUNICIPALITIES AND MUNICIPAL STAFF

1. Municipal Employee Training

Municipal employees in jobs that in any way could impact stormwater quality will receive training that is meant to educate them on the stormwater program and the ways in which municipal operations can be carried out in a manner that causes less impact.

Measurable Goals

Years 1-5 – Provide municipal stormwater training to pertinent municipal employees.

2. Level 1 Certification

Those employees that are most closely involved in the day to day management of the stormwater program will maintain a Level 1 Certification from TDEC.

Measurable Goals

Years 1-5 – Employees responsible for management of the stormwater program (or consultants utilized for this task) will be Level 1 Certified at all times of permit coverage.

E. ELECTED / APPOINTED OFFICIALS

1. Development Meetings

The City will hold annual meetings with the construction and development community to inform and to gather input on the stormwater program. These meetings will be used as an avenue to inform contractors and developers of proposed changes in the stormwater program. They will also be used as a means of receiving public input on proposed changes to the program. Elected and appointed city officials will be encouraged to attend these meetings to keep informed on the stormwater program and the thoughts of the development community on the program.

Measurable Goals

Years 1-5 – Hold one meeting each year of permit coverage.

2. Planning Commission Training

As the city progresses towards implementation of the green infrastructure requirements of the permit it will be necessary for the planning commission to become informed and involved in the process. Implementation will involve the review and likely modification of existing documents such as subdivision regulations and codes. The planning commission will need to be well educated in the ins and outs of the different types of controls that may be used to meet the green infrastructure requirements of the permit.

Measurable Goals

Year 1 – Prepare training materials

Year 2 – Present training to planning commission and begin discussions

Year 3 – Continue planning and discussion meetings with planning commission

Year 4 – Make appropriate changes to codes and regulations to allow full implementation of green infrastructure standards.

Year 5 – Continue implementation and enforcement of green infrastructure standards

VI. PROGRAM EVALUATION

The information and education plan is a product of a continuous planning and evaluation process. Evaluation is an important component of the information and education plan. It begins when the program is planned, is incorporated into each step of implementation, and is emphasized at critical points. Evaluation will be an ongoing process to measure the effectiveness of both the individual activities and the plan in increasing knowledge that could lead to positive behavior changes.

Annually, a formal evaluation of the plan will be conducted by those responsible for management of the program. This evaluation will consist of a review of the target audiences and the objectives that are trying to be met for each audience. Each objective will be evaluated to determine whether the current level of education is meeting the objective. The measurable goals for each specific task will also be evaluated to confirm that the goals have been met or to readjust the goals as may be necessary to adequately fulfill the objectives of the program.

VII. PROGRAM RESPONSIBILITY

The Millington Public Works Department is responsible for the management of the stormwater management program. While the Public Works Department will seek the assistance of other departments and agencies with the educating of the general public and other audiences discussed in this plan, the department will oversee all of the efforts.

VIII. CONCLUSION

The effective education of the audiences described in this plan is of the utmost importance to the overall effectiveness of the stormwater management program. Without effective education, there will never be an atmosphere of change in the mentality of the public towards stormwater quality management. Therefore, this public information and education plan will be a constant work in progress and a guide to be utilized by the city to ensure that the education of the public remains consistent and effective in reaching the objectives of the plan. The plan will be modified as necessary to make further progress toward meeting the objectives of the overall stormwater management program.

APPENDIX A

STORWWATER OUTREACH RECORDS AND EVALUATION FORMS

STORMWATER OUTREACH RECORD AND EVALUATION FORM

Activity Information:

Name

Date

Location

Organizer

Attendance

Activity Description and Purpose:

Activity Evaluation:

Were the goals for the activity met?

What parts of the activity went well, and what parts needed improvement?

For parts that need improvement, what specific suggestions do you have?

#2

STORMWATER OUTREACH RECORD AND EVALUATION FORM

Activity Information:

Name INTERNATIONAL GOAT DAYS FAMILY FESTIVAL
Date SEPTEMBER 6-7, 2019
Location USA STADIUM, MILLINGTON, TN
Organizer CITY OF MILLINGTON (JASON DIXON FOR BOOTH)
Attendance _____

Activity Description and Purpose:

GENERAL PUBLIC STORMWATER EDUCATION. THE FESTIVAL IS
AN ANNUAL EVENT HELD BY THE CITY W/ FAMILY ACTIVITIES
AND VENDOR BOOTHS/TENT. WE PUT UP A TENT AND
PROVIDE GENERAL STORMWATER EDUCATION PAMPHLET TO PEOPLE
THAT STOP BY.

Activity Evaluation:

Were the goals for the activity met?

YES. MANY CITIZENS STOPPED BY AND LEARNED ABOUT
STORMWATER AND THE ROLE THEY CAN PLAY.

What parts of the activity went well, and what parts needed improvement?

WHEN PEOPLE STOP AT THE BOOTH, WE ARE ABLE TO GET THEM
GOOD GENERAL INFO. IT WOULD BE BETTER TO ALSO HAVE A
SWAG FOCUSED MESSAGE TO GO ALONG W/ THE GENERAL STUFF

For parts that need improvement, what specific suggestions do you have?

- ADD A LARGE SIGN TO THE BOOTH FOR VISIBILITY
- DEVELOP A "POINT OF EMPHASIS" MESSAGE AND ~~EXPER~~ FLIER.

#2

Stormwater Maintenance

Email address *

sample@sample.com

Did your group perform any stormwater-related maintenance activities in the last week?

☒ YES

☐ NO

Activity Details

When did the activity occur?

Monday ▼

Please describe the activity, including location and general description of work performed.

Cleaned out ditch on NW corner of Navy Road and Veterans Parkway.

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Google Forms

CITY OF MILLINGTON
2020 PUBLIC STORMWATER OUTREACH SCHEDULE

Date	Description
January 2020	Social Media Campaign, Keep Millington Beautiful Cleanup Event (<i>Location TBD</i>)
February 2020	Social Media Campaign
March 2020	Social Media Campaign, Keep Millington Beautiful Cleanup Event (<i>Location TBD</i>)
April 2020	Social Media Campaign
May 2020	Social Media Campaign, Farmer's Market Booth (<i>Oil Recycling Emphasis</i>)
June 2020	Social Media Campaign
July 2020	Social Media Campaign, Farmer's Market Booth (<i>Lawn Care Emphasis</i>)
August 2020	Social Media Campaign
September 2020	Social Media Campaign, Goat Days Festival Booth (<i>Pet Waste Emphasis</i>)
October 2020	Social Media Campaign
November 2020	Social Media Campaign, Keep Millington Beautiful Cleanup Event (<i>Location TBD</i>)
December 2020	Social Media Campaign

Note that this is a tentative schedule and subject to change. The intent is to have one "in-person" event every other month, along with monthly Social Media outreach.

Farmer's Market and Goat Days Festival Booths will be for general stormwater education, with a specific point of emphasis at each session.

The Social Media Campaign is administered by the Tennessee Stormwater Association, where the City of Millington is a member agency.

**CITY OF MILLINGTON
STANDARD OPERATING PROCEDURES (SOP) FOR
ILLCIT DISCHARGE DETECTION**

- 1. City Staff Inspection and Reporting**
- 2. Citizen Reporting Process**

1. City Staff Inspection and Reporting

- City staff is responsible for reporting any illicit discharges discovered during outfall inspections.
- Staff shall be trained on how to identify an illicit discharge such as the following:
 - Unusual odors, colors, or conditions in surface water, storm drain outfalls or inlets.
 - Cloudy or murky water
 - Floatables, such as toilet paper, suds, or excessive trash
 - Unnatural (excessive or dead) vegetation near an outfall pipe
 - Odd deposits or stains on an outfall pipe
 - Leaks, spills, or dumping of damaging fluids and/or materials
 - Staining or discoloration around dumpsters, loading docks, and inlets
- The City of Millington is responsible for ensuring that employees are properly informed of and trained on how to prevent illicit discharges from their operations and how to trace an illicit discharge upon discovery.
- Managers and supervisors are responsible for ensuring training is conducted with the most recent SOP.
- The City Stormwater Manager will be notified of any illicit discharge detected during a storm sewer outfall inspection or otherwise identified as the responsibility of the inspection team to address. A complete description of the discharge and as much information as possible will be provided.
- The report should include the following:
 - Location of problem
 - Time that problem was found
 - Odor, color, turbidity, and floatables,
 - One or more digital photos to document the condition, if possible,
 - Any other relevant or pertinent information
- When the contaminant is discovered, staff will log enter information about the incident, which will describe the nature of the contamination, all responses, and the follow up measures taken to clean it up.
- If the contaminant is identified as dangerous, the fire department will be called for assistance.
- If the source of the discharge can be immediately identified as due to ongoing contractor work, staff should notify the operator to cease work.
- If the contaminant is not easily identified, various methods can be used to trace the discharge, such as the following:
 - Dye testing to determine improper connections.
 - Camera equipment to video drainage/sewer lines.

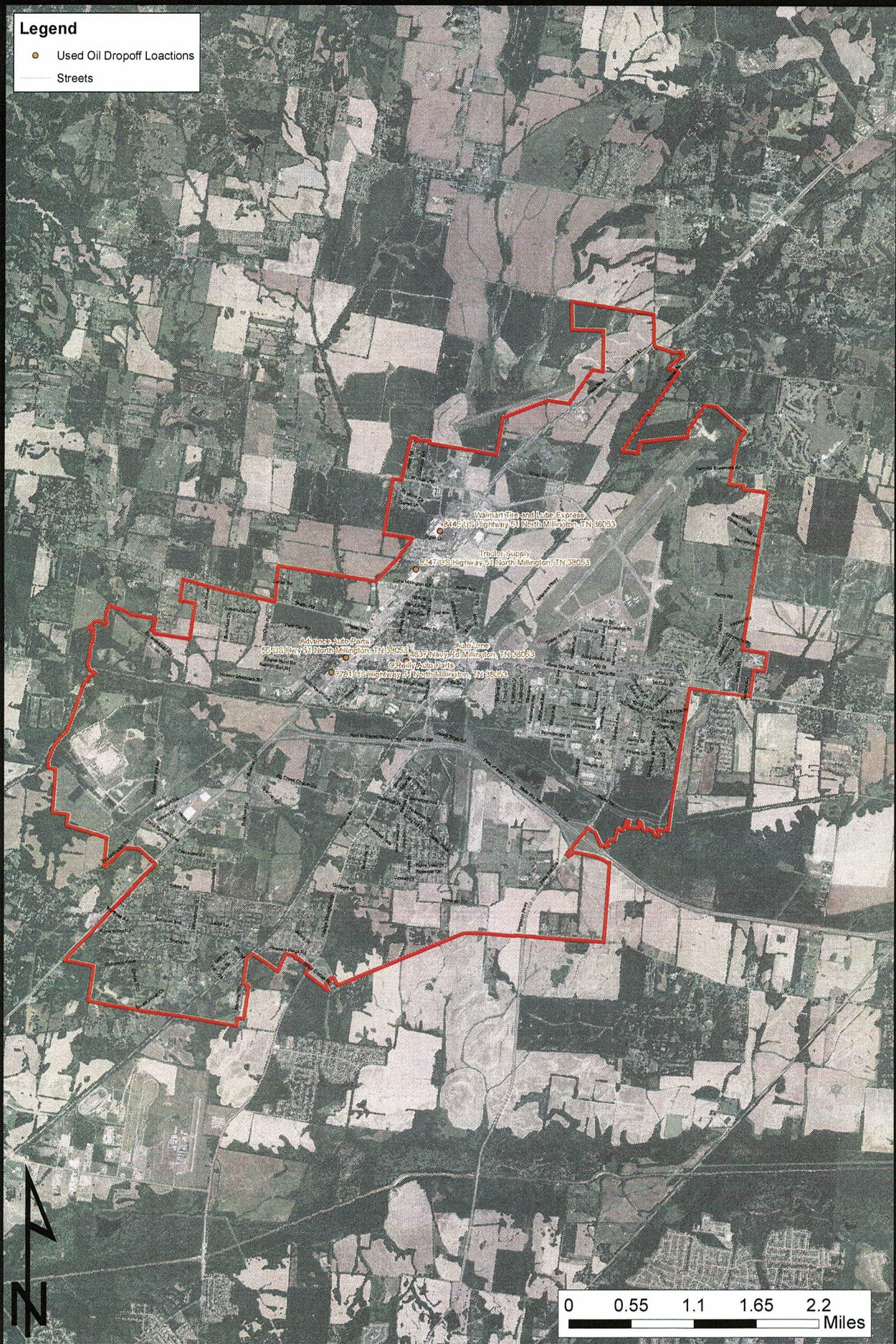
- Smoke testing to identify cross-connections.
- Upon confirmation of the illicit discharge staff should follow up within 48 hours to revisit the site and ensure that the illicit discharge has been eliminated and additional issues have not occurred as a result of the clean-up efforts.

2. Citizen Reporting Process

- Citizens have numerous ways to report illicit discharges if they encounter them.
- They can call or visit City Hall to report the incident and provide additional data and details.
- They can email the stormwater coordinator, Jason Dixon, at J.DIXON@MILLINGTONTN.GOV.
- They can go to the City of Millington website and report the discharge. The website asks for contact information from the citizen that is then used to provide updates of the identification, and if needed clean up to the person who reported it. The link to report online is located here:
<http://www.cityofmillington.org/RequestTracker.aspx?CID=14>

Legend

- Used Oil Dropoff Locations
- Streets



MILLINGTON USED OIL DROPOFF LOCATIONS 2019

#6

STORM WATER POLLUTION PREVENTION PLAN



**City of Millington
October 2019**

PREPARED FOR:

**City of Millington Public Works Yard
4701 Jack Huffman Boulevard
Millington, TN 38053**

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STORM WATER POLLUTION PREVENTION PLAN CERTIFICATION PAGE

Name of Facility: City of Millington Public Works Yard

Type of Facility: Construction and Maintenance Support

Location of Facility: 4701 Jack Huffman Boulevard, Millington, Tennessee, 38053

Facility Contact Information: Jimmy Black, Director of Public Works (901) 873-5670

MANAGEMENT CERTIFICATION

“I certify that I have read and understood this Storm Water Pollution Prevention Plan (SWPPP) and believe the information contained within is true, accurate and complete. In signing this management certification, I am verifying my commitment to help in the reduction of storm water pollution by implementing and maintaining the Best Management Practices (BMPs) specified in this SWPPP and that the plan will be complied with.”

<hr/>	<hr/>
Facility Administrator; Print or Type	Title

<hr/>	<hr/>
Signature	Date

“I certify that this document and attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information contained within. Based on my inquiry of the person, or persons, who manage the system, or those persons directly responsible for gathering the information; the information contained in the document is, to the best of my knowledge and belief, true, accurate and complete.”

<hr/>	<hr/>
Storm Water Manager; Print or Type	Title

<hr/>	<hr/>
Signature	Date

1.0 INTRODUCTION

1.1 General Information

Over the last 30 years, the Environmental Protection Agency (EPA) and state water quality agencies have realized the great impact that rain water runoff has had on surface waters. Rain falling in urban areas can be contaminated with sediments, suspended solids, nutrients, metals, pesticides, organic materials and floating trash. In the City of Millington, the storm water conveyance system is completely separate from its sanitary sewer system. This means that rain water runoff is discharged directly into the nearest creek, stream, river, pond or lake without treatment. In order to protect those bodies of water, pollution of the storm water runoff must be prevented at the source.

In 1972, the Clean Water Act created the National Pollution Discharge and Elimination System (NPDES). Through this act and its subsequent amendments in 1977 and 1987, the City of Millington was required to obtain a permit to discharge storm water runoff into waters of the State of Tennessee in accordance with various eligibility criteria, administrative procedures, program and reporting requirements. The Tennessee Department of Environment and Conservation (TDEC) issued the City of Millington permit number TNS075442. This permit requires the City to impose controls to reduce the discharge of pollutants in storm water to the maximum extent practical by the use of best management practices (BMPs). One BMP is to develop Storm Water Pollution Prevention Plans (SWPPPs) for all applicable facilities. This SWPPP has been prepared to satisfy Millington's obligation under its NPDES permit and to help reduce storm water pollution from the facility. A copy of this SWPPP will be maintained on site and another will be kept at the office of the Millington Stormwater Manager, located at 7930 Nelson Road, Millington, TN 38053.

1.2 Objectives

The primary goal of the prepared SWPPP is to improve the quality of surface waters by eliminating or reducing the amount of pollutants contained in the storm water runoff leaving the facility. This SWPPP will:

1. identify and list persons responsible for implementing and maintaining the plan;
2. identify and describe potential sources of storm water contamination;
3. identify and prescribe appropriate administrative BMPs designed to prevent storm water contamination from according;
4. identify and prescribe appropriate structural BMPs to reduce pollutants in contaminated storm water prior to discharge;
5. prescribe actions needed to evaluate the results and update the plan on a regular basis.

2.0 POLLUTION PREVENTION TEAM

The storm water pollution prevention team is responsible developing, implementing, maintaining, and revising the SWPPP. The team members have been selected to contain persons that are familiar with federal, state, and local regulations regarding storm water discharges, sediment and erosion control, pollution prevention, and the management and operations of the City of Millington Public Works Yard. A list of the Pollution Prevention Team members and their responsibility's are provided in *Table 1* of *Appendix A*.

3.0 DESCRIPTION OF POTENTIAL POLLUTANT SOURCES

3.1 Facility Information

The facility occupies an area of approximately 3.25 acres (142,900 SF) on the south side of Jack Huffman Boulevard at the intersection of Newport Road. The facility lies adjacent to other City of Millington properties and parks in central Millington, Tennessee. The facility location is shown on the U.S.G.S Millington Quadrangle map in *Figure 1* of *Appendix B*.

3.2 Drainage Information

The facility lies within the Loosahatchie River Drainage Basin. Surface waters within this drainage basin flow approximately 900 feet Southward into Big Creek. From there the discharge travels approximately 9 miles into the Loosahatchie River. The discharge then travels approximately 7.7 miles to the Mississippi River.

Storm water runoff primarily exits the facility via sheet flow to an open concrete ditch. This ditch is fenced on both sides and is well maintained.

3.3 Facility Functional Units

The facility consists of six buildings, two fuel tanks, asphalt paved parking lots and driveways. The areas around the buildings and parking lot are paved without landscaping. At the very North of the facility is a staff parking lot. There is a main building South of the staff parking lot, two buildings along the Eastern boundary of the facility, and three buildings along the Southwest boundary of the facility. Between these buildings is a service parking lot. The balance of the facility is the maintenance yard, which is a combination of loose gravel and dirt. A detailed photograph of the facility is included on *Figure 2* of *Appendix B*.

For the purpose of this SWPPP the facility will be divided into five (5) functional units that are each characterized by a specific suite of actual or potential storm water pollutants and of BMPs that will eliminate or at least minimize entry of these pollutants into the storm water. These five (5) functional units are as follows:

- Buildings;
- Fuel storage;
- Material storage area;

- Vehicle storage lot;
- Parking lots.

A brief description of each of the above functional units is provided below along with a summary of the potential storm water pollutants associated with each functional unit.

Buildings – One building is present at the facility that makes up approximately 10% of facility property (14,700 SF): The main office and maintenance building. This functional unit also includes any adjacent concrete walkway areas. The primary potential storm water pollutants associated with the “Buildings” functional unit are contaminants discharged by runoff from the roof drains located along the buildings and improperly disposed trash.

Fuel Storage -- This functional unit includes two petroleum storage tanks that make up approximately 0.8% of the facility property (1,100 SF).

Material Storage Area – This functional unit includes approximately 25% of the facility property (35,800 SF). This functional unit contains bulk construction materials and equipment stored for use by the Public Works Department. Some of the materials on site are exposed to precipitation. The primary potential storm water pollutants associated with the “Material Storage Area” functional unit includes displaced materials and sediments combining with the run off and leaving the facility.

Vehicle Storage Lot -- This functional unit includes the approximately 12% of the facility property (17,400 SF). The primary potential storm water pollutants associated with the “Vehicle Storage Lot” functional unit include the following: Leaking fluids (*e.g., gasoline, oils, antifreeze, transmission fluid, battery acid, etc.*) from vehicles and equipment; engines, transmissions, batteries, etc.; trailers; trash and debris; and sediments.

Parking Lots -- This functional unit consists of the asphalt-paved parking lot and driveway area at the northern end of the property and includes approximately 8% of the facility property (11,100 SF). The primary potential storm water pollutants associated with the “Parking Lots” functional unit are oil, fuel, and other fluids leaking from parked vehicles. Other potential storm water pollutants could include the following: Improperly disposed trash; applied fertilizers, herbicides, and pesticides; grass clippings, leaves, and other natural organic materials; and eroding sediments.

3.0 BEST MANAGEMENT PRACTICES

There are two (2) major types of BMPs included in this SWPPP: administrative and structural. Administrative BMPs are standard policies or practices instituted at a facility to prevent or at least minimize storm water pollution. Examples of administrative BMPs include such policies/practices as always using herbicides in accordance with the manufacturer's instructions, never using them when heavy rain is forecast in the near future, cleaning up spills as soon as they occur or are identified, and properly disposing of the used clean-up materials. Structural BMPs are equipment and/or structures that are designed and installed/ constructed at a facility to prevent or at least minimize storm water pollution. Examples of structural BMPs include catch basins that remove sediment from storm water before it is discharged from a facility, silt fences to prevent sediments from being carried off construction areas by storm water, secondary containment around chemical storage areas to hold any spilled or leaked materials, and oil/water separators to remove spilled or leaked oil from storm water before it is discharged from a facility.

Table 1 of Appendix C lists the BMPs that have been developed for all of the functional units associated with the facility. The purpose of these BMPs is to minimize the discharge of pollutants to storm water at these functional units. The facility management is committed to implementing these BMPs as required.

3.2 Spill and Leak Reporting

XXXXXXXXXXXXXXXXXXXXX

3.3 Employee Training

XXXXXXXXXXXXXXXXXXXXX

3.5 Sediment and Erosion Control

Silt and sediment run-off causes biological, physical and chemical impairment to rivers and streams. TDEC has specific regulations and requirements for sites with areas of construction activity of one (1) acre or more. A separate storm water permit from TDEC is required for these sites. The facility operator or the contractor must prepare an engineered Erosion and Sediment Control Plan for grading and construction activities, which is required to be submitted to TDEC and the City of Millington for review. All structures and BMPs required by the SWPPP must be in place prior to disturbing any soils. The Erosion and Sediment Control Plan must also include a post-construction BMP plan for the new facility.

If the facility is performing land-disturbing activities in an area less than one (1) acre, it is important to implement BMPs that control siltation in the construction area and prevent it from flowing into the storm drains. Examples of sediment and erosion control BMPs are inlet protection, silt fencing and settling ponds.

4.0 SITE COMPLIANCE EVALUATION

Site inspections should be conducted periodically at the facility, because they are useful tools in determining if the BMPs implemented at the facility are adequate and properly maintained. It is required that a comprehensive inspection be performed at least once a year. Forms and instructions for this comprehensive inspection are provided in *Appendix D*. These forms can be modified to reflect new facility-specific conditions. If requested, personnel from the Engineering Department can perform the annual inspection on behalf of the facility management.

In general, the comprehensive inspection should examine areas potentially contributing to storm water discharge for evidence of, or the potential for, pollutants entering the drainage system. Existing pollutant reduction BMPs should be evaluated to determine adequacy, proper implementation, and if any additional BMPs are necessary. All structural BMPs identified in the SWPPP related to storm water management, sediment and erosion control, and pollution prevention should be observed to ensure proper operation. A visual inspection of spill clean-up and any other equipment needed to support and implement the SWPPP should also be made. Any areas of non-compliance identified during the comprehensive inspection should be reported on the inspection forms. If areas of non-compliance are identified, this SWPPP should be reviewed and revised to incorporate additional BMPs.

APPENDIX A

TABLE 1 STORM WATER POLLUTION PREVENTION TEAM PUBLIC WORKS YARD			
Team Member	Contact Information	Title	Responsibility
Jimmy Black	873-5701	Public Works Director	Overall plan implementation
Rodney Stanback	873-5701	Sanitation Supervisor	Claw trucks and garbage trucks
Billy Ragghainti	873-5701	Streets Supervisor	Grass cutting, potholes, paving, concrete

APPENDIX B

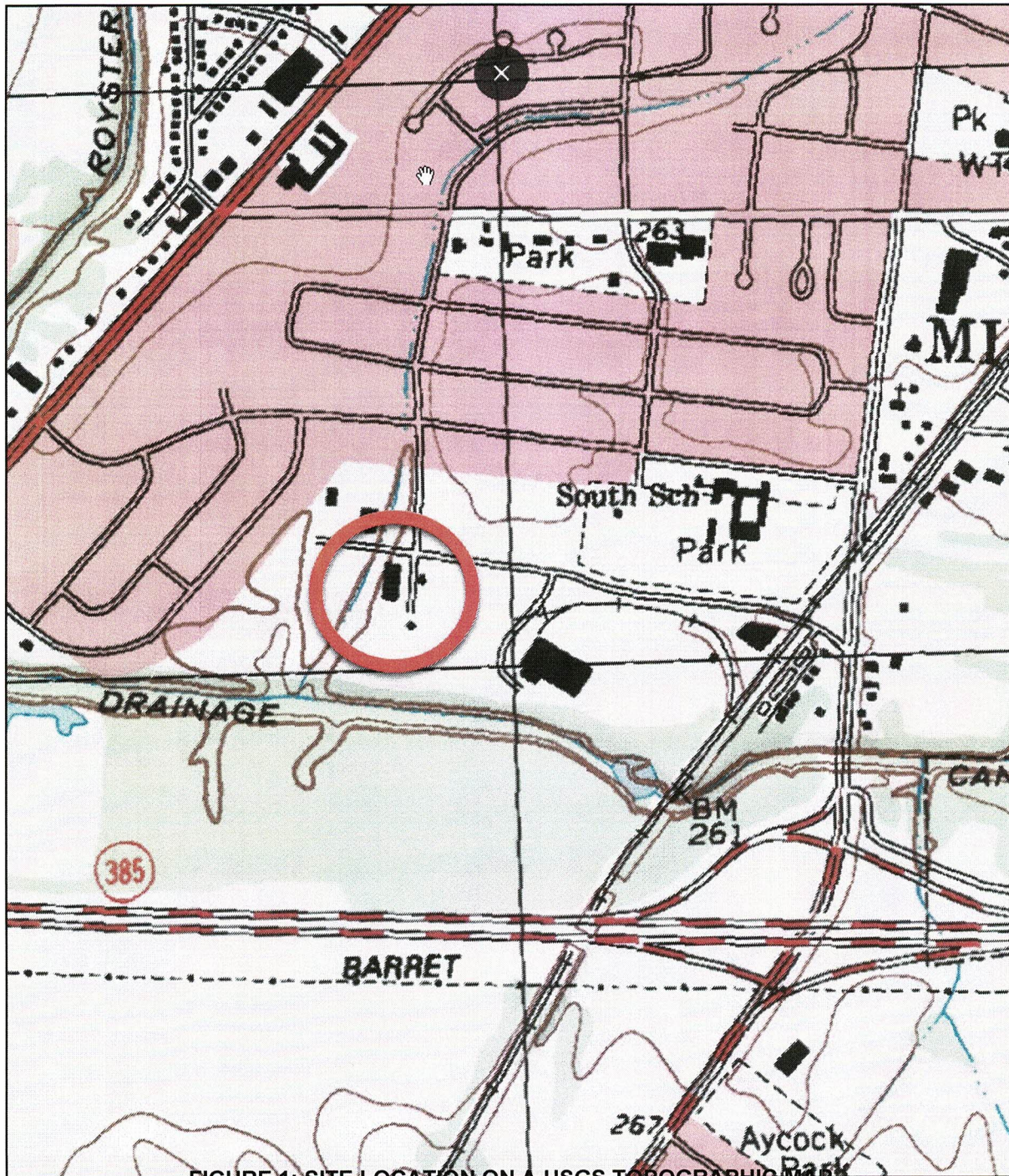


FIGURE 1: SITE LOCATION ON A USGS TOPOGRAPHIC MAP
CITY OF MILLINGTON PUBLIC WORKS YARD

APPENDIX B

- ① STAFF PARKING
- ② SERVICE PARKING
- ③ OFFICE
- ④ EQUIPMENT STORAGE
- ⑤ MATERIAL STORAGE
- ⑥ MAINTENANCE BAYS
- ⑦ FUEL



**FIGURE 2: SITE DETAILS AND ACTIVITIES
CITY OF MILLINGTON PUBLIC WORKS YARD**

BEST MANAGEMENT PRACTICE (BMP)		BUILDING	FUEL DISPENSING	FUEL STORAGE	MATERIAL STORAGE	VEHICLE STORAGE	PARKING LOT
Training							
1	All personnel responsible for implementing and/or maintaining this SWPPP (<i>including managers, supervisors, foremen, and applicable contractor personnel</i>) are required to be trained regarding the BMPs identified in this SWPPP.	X	X	X	X	X	X
2	All personnel should be trained regarding the County's Storm Water Management Program.	X	X	X	X	X	X
General Housekeeping							
1	Whenever possible, use non-hazardous and non-toxic detergents and cleaners. Evaluate detergents and cleaners by reviewing the material safety data sheets to determine hazard levels, toxicity, and proper storage and disposal methods.	X	X	X	X	X	X
2	Sweep paved surfaces instead of hosing down with water or using blowers. Swept waste materials should be collected, properly contained (<i>e.g., covered dumpster</i>), and disposed of to the landfill.	X	X	X	X	X	X
3	Collect, and properly contain and dispose of wash water, sweepings, and sediments.	X	X	X	X	X	X
4	Control litter by sweeping and picking up trash on a regular basis and especially after heavily attended special events.	X	X	X	X	X	X
5	Keep dumpster lids closed to keep out rainwater and prevent trash from spilling out. Post reminder signs, such as "Keep Lid Closed."	X	X				X
6	Keep dumpster drain valves closed to prevent contaminated fluids from being released.	X	X				X
7	Do not hose out dumpsters with water. Apply dry absorbent material over any fluids spilled in the dumpster. Have the dumpster leasing company clean out dirty dumpsters at their facility.	X	X				X
8	Have the leasing company repair or replace leaking dumpsters.	X	X				X
9	Maintain an adequate number of trash receptacles in heavy use areas.	X				X	X
10	Use plastic liners in all trash receptacles to keep insides clean (<i>i.e., minimize need to wash</i>) and to prevent leaks (<i>i.e., non-solid receptacles</i>).	X	X			X	X
11	Prevent trash receptacles from being knocked or blown over and spilling trash by using heavy receptacles, weighting down receptacles, or securing to a post.	X	X			X	X

BEST MANAGEMENT PRACTICE (BMP)		BUILDING	FUEL DISPENSING	FUEL STORAGE	VEHICLE IMPOUND LOT	PARKING LOT	CONTRACTOR
12	Empty trash receptacles at least weekly. Increase collection frequency during heavier usage periods during the year.	X	X			X	X
13	Store spill containment and clean-up materials or kits in a readily accessible central location or at several locations near the most likely spill areas. Replace used spill containment and clean-up materials in a timely manner. Regularly maintain materials or kits.	X	X	X	X	X	X
14	Clean up spills immediately. Use rags, damp mops, or dry absorbent materials rather than running water to clean up spills (i.e., Do not hose-off). If necessary to use water, block nearby storm drain inlets and collect/dispose of water before re-opening.	X	X	X	X	X	X
15	Sweep-up and contain used absorbent materials in a timely manner so it does not get washed away by storm water runoff.	X	X	X	X	X	X
16	Properly contain and dispose of all used spill clean-up materials. Temporally contain used spill cleanup materials in sealed drum and dispose of in accordance with Federal, State, and local rules and regulations, if it is contaminated with hazardous materials or hazardous waste.	X	X	X	X	X	X
17	Clean indoor floor-mats, filters, and trash cans in a janitorial or mop sink, floor drain, or proper outdoor area that drains to the sanitary sewer, and not to any storm water conveyances. Do not clean in parking lot, street, sidewalk, or any other area subject to storm water runoff.	X	X			X	X
18	Pour wash-water into a janitorial/mop sink or floor drain that drains to the sanitary sewer. Do not pour outdoor into a parking lot, street, sidewalk, or any other area subject to storm water runoff.	X	X				X
19	Do not dispose of fats, grease, and oils by pouring into a sink or floor drain, which would clog the sanitary sewer conveyance system. Instead, containerize, let solidify, and dispose of with other solid waste to a landfill.	X	X				X
20	Check grease traps on regular basis, especially after heavy use. Hire disposal contractor to pump out grease traps as necessary to prevent overflow or bypass.	X	X				X
21	Route roof drain outlets away from storage or maintenance areas.	X	X				X

BEST MANAGEMENT PRACTICE (BMP)		BUILDING	FUEL DISPENSING	FUEL STORAGE	VEHICLE IMPOUND LOT	PARKING LOT	CONTRACTOR
22	Install concrete pads or other protective cover where roof drains discharge onto unpaved areas in order to minimize erosion, or equivalent erosion control.	X	X				X
23	Inspect all storm drain inlets, surface storm water conveyances, and natural storm water drainage-ways on a monthly basis (<i>or more often, if required</i>) and remove all trash, debris, leaves, etc.	X	X			X	X
Vehicle Storage and Leak Control							
1	Inspect all vehicles for leaks upon arrival at the facility.				X		X
2	To the maximum extent practical, designate a specific area (<i>or areas</i>) for storage of vehicles with visible leaks or the potential to develop leaks (<i>i.e., heavily damaged vehicles</i>).				X		X
3	Inspect impound lot areas on a daily basis to identify leaking vehicles.				X		X
4	To the maximum extent practical, move any discovered leaking vehicles currently stored in a non-designated area to the area specifically designated for storage of leaking vehicles.				X		X
5	To the maximum extent practical, drain fluids from leaking vehicles.				X		X
6	To the maximum extent practical, collect leaking or dripping fluids in drip pans or containers.				X		X
7	Promptly transfer used fluids to the proper waste or recycling drums. Do not leave drip pans or other open containers lying around.				X		X
8	Keep different liquid waste types segregated to facilitate recycling or disposal.				X		X
9	Properly store and dispose or recycle drained/collected fluids.				X		X
10	Store cracked batteries in a non-leaking secondary container and dispose of properly.				X		X
11	Recycle or properly dispose oil filters, batteries, and tires.				X		X
12	Clean up spills immediately using dry absorbent materials (<i>do not use water</i>). Designated storage areas for leaking vehicles must be cleaned on a daily basis and immediately prior to any forecast rain event.				X		X
13	Sweep up used absorbent materials in a timely manner so does not get washed away by storm water runoff.				X		X
14	Properly dispose of all used spill clean-up materials				X		

BEST MANAGEMENT PRACTICE (BMP)		BUILDING	FUEL DISPENSING	FUEL STORAGE	VEHICLE IMPOUND LOT	PARKING LOT	CONTRACTOR
15	Store all waste materials to be recycled or disposed in an enclosed – or at least covered – area. Keep all containers sealed and covered.				X		
Landscape Maintenance							
1	Use mechanical control of vegetation (<i>mowing, hand cutting, and hand weeding</i>) whenever possible.	X				X	X
2	Use native vegetation to reduce amount of water, fertilizers, herbicides, or pesticides needed.	X				X	X
3	Do not over-apply fertilizers, herbicides, or pesticides. Use only as needed and as directed by manufacturer.	X				X	X
4	Avoid over-watering or irrigating paved surfaces to prevent excess runoff.	X				X	X
5	Do not apply fertilizers, herbicides, or pesticides when heavy rain forecast. Minimize applications during wet season.	X				X	X
6	Do not blow leaves or grass clippings into storm drain inlets, storm water conveyances, or natural storm water drainage-ways.	X				X	X
7	Inspect all storm drain inlets, surface storm water conveyances, and natural storm water drainage-ways at least monthly or as necessary to keep these free of all trash, debris, leaves, etc.	X				X	X
8	Protect areas of erosion by re-vegetating (<i>e.g., seeding</i>) or covering with gravel, rock, or concrete. Implement measures (<i>e.g., re-grade or plant different vegetation type</i>) to reduce storm water runoff flow velocity in areas of erosion.	X				X	X
9	Land-disturbance activities (<i>i.e., clearing and grading</i>) on an area of one (1) acre or greater requires a separate storm water permit and engineered erosion control plan from TDEC. Such activities on an area less than one (1) acre requires implementation of erosion control BMPs, such as silt fencing, inlet protection, and/or settling ponds.						X
10	Use integrated pest management program whenever possible.	X				X	X
11	Stockpiles of soil, sand, gravel, amendments, manure, salt, and similar material types should be covered and contained (<i>i.e., bermed</i>) to prevent contact with – and contamination of -- storm water. Storm water should not be allowed to flow through these stockpiles.					X	X

BEST MANAGEMENT PRACTICE (BMP)		BUILDING	FUEL DISPENSING	FUEL STORAGE	VEHICLE IMPOUND LOT	PARKING LOT	CONTRACTOR
12	Debris piles should be evaluated to determine their potential to contaminate storm water. If this potential exists, then the piles should be covered and contained to prevent storm water from contacting/flowing through and becoming contaminated.					X	X
Vehicle and Equipment Maintenance & Washing							
1	Provide a designated area for equipment maintenance and repair. Perform equipment maintenance and repair activities indoors whenever possible or use an area designed and constructed to prevent storm water pollution. If not possible, perform activities in a flat area as far away from any storm drain inlets or drainageways as possible and protect nearby inlets with such protective barriers as absorbent socks.				X	X	X
2	Keep equipment clean – do not allow excessive buildup of oil and grease.				X	X	X
3	Recycle vehicle fluids (<i>e.g., used motor oil and antifreeze</i>), lubricants, solvents, and cleaners or properly dispose of these chemicals. Recycle or properly dispose oil filters, batteries, and tires.				X	X	X
4	Keep different liquid waste types segregated to facilitate recycling or disposal.				X	X	X
5	Store all waste materials to be recycled or disposed in an enclosed – or at least covered – area. Keep all containers sealed and covered.				X	X	X
6	Provide secondary containment around any waste materials stored outdoors or around materials stored indoors that could flow outdoors in the event of a spill or leak.				X	X	X
7	Store damaged or leaking batteries in a non-leaking secondary container and dispose of properly.				X	X	X
8	Regularly check all vehicles and equipment for leaks. Repair all leaks immediately. Clean up any spilled fluids properly (see above).				X	X	X
9	Collect leaking or dripping fluids in drip pans or containers.				X	X	X
10	Promptly transfer used fluids to the proper waste or recycling drums. Do not leave drip pans or other open containers lying around. As noted above, keep different liquid waste types segregated to facilitate recycling or disposal.				X	X	X

BEST MANAGEMENT PRACTICE (BMP)		BUILDING	FUEL DISPENSING	FUEL STORAGE	VEHICLE IMPOUND LOT	PARKING LOT	CONTRACTOR
11	Sweep up grit and shavings generated when using a grinder to sharpen mower blades and other cutting equipment/tools. Collect on a daily basis and place in covered dumpster for landfill disposal with the facility's other solid waste				X	X	X
12	Drain oil and other fluids when a vehicle or equipment will be stored outdoors.				X	X	X
13	Store idle equipment under cover. Evaluate whether idle and stored equipment should be sold (<i>auctioned</i>), donated, transferred, recycled, or properly disposed of.				X	X	X
14	Make sure all employees know the appropriate contacts to notify in the event of a large spill.		X	X	X	X	X
15	Wash vehicles and/or equipment only in paved areas designed/constructed to collect and discharge wastewater to the sanitary sewer. Use another properly equipped Division facility or a commercial car wash if your facility does not meet this requirement.	X	X	X	X	X	X
16	Avoid using cleaners and detergents if possible. Use non-toxic and non-hazardous solutions for equipment cleaning. Use biodegradable and phosphate-free detergents for vehicle and/or equipment washing.	X	X	X	X	X	X
Fuel Storage and Dispensing							
1	To the greatest extent possible, refueling of vehicles and equipment should be conducted at a central, specially designed location. Use of mobile fuel dispensers at various work sites should be avoided whenever possible. When mobile fuel dispensers are used, to the greatest extent possible such refueling activities should be conducted in a paved area far away from any drain inlets or drainageways, secondary containment should be employed, and/or any nearby inlets/drainageways should be protected (<i>e.g., surround with absorbent socks or covered with plates</i>).		X	X		X	X
2	Paved fueling areas with concrete rather than asphalt, or apply a sealant to the asphalt to protect it from spilled fuels.		X	X			X
3	Install vapor recovery nozzles to control drips.		X	X			X
4	Discourage "topping off" of fuel tanks.		X	X			X
5	Operator must remain at vehicle or equipment during refilling operation and be prepared to immediately turn off dispenser in case fuel begins to overflow.		X	X			X

BEST MANAGEMENT PRACTICE (BMP)		BUILDING	FUEL DISPENSING	FUEL STORAGE	VEHICLE IMPOUND LOT	PARKING LOT	CONTRACTOR
6	Use secondary containment when transferring fuel from tanker trucks to tanks.		X	X			X
7	Tanker truck driver should be instructed to inform facility personnel before refilling of tank begins.		X	X			X
8	Any drain inlets (<i>storm water and sanitary sewer</i>) or drainageways should be protected during refilling of tank (<i>e.g., surround with absorbent socks or covered with plate</i>).		X	X			X
9	Tanker truck wheels should be chocked during refilling of storage tank to prevent the truck from moving for any reason.		X	X			X
10	Tanker truck operator must remain at truck during refilling operation and be prepared to immediately turn off transfer system in case fuel begins to overflow.		X	X			X
11	Make sure all employees know the appropriate contacts in the event of a large spill.		X	X			X
Chemical Storage and Spill Prevention							
1	Store all chemicals (<i>e.g., fertilizers, herbicides, pesticides, oil, grease, paint, etc.</i>) in an enclosed, or at least covered area (<i>e.g., roofed</i>). The area should also be bermed to prevent storm water flow through the area. Keep all containers sealed and covered. Metal piping or other metal supplies that can corrode should also be stored in a covered area, or properly maintained (<i>e.g., coated or painted</i>).	X	X	X	X	X	X
2	Provide secondary containment around any materials stored outdoors or around materials stored indoors that could flow outdoors in the event of a spill or leak.	X	X	X	X	X	X
3	Inspect storage areas and containers at least weekly for corrosion or leaks.	X	X	X	X	X	X
4	Make sure all chemical storage containers are properly labeled in accordance with the material safety data sheet.	X	X	X	X	X	X
5	Keep storage areas clean and well organized. Store containers to allow easy inspection for corrosion or leaks.	X	X	X	X	X	X
6	Stack containers so that possibility of tipping over, puncturing, breaking, or impact is minimized.	X	X	X	X	X	X
7	Raise drums off the floor to prevent corrosion from leaks or sweating concrete.	X	X	X	X	X	X

BEST MANAGEMENT PRACTICE (BMP)		BUILDING	FUEL DISPENSING	FUEL STORAGE	VEHICLE IMPOUND LOT	PARKING LOT	CONTRACTOR
8	Dispense and transfer materials using pumps or gravity-fed spigot/funnels. If possible, provide secondary containment when mixing chemicals with water to formulate solutions for application.	X	X	X	X	X	X
9	Make sure all employees know the appropriate contacts in the event of a large spill.	X	X	X	X	X	X
Water and Wastewater Discharge							
1	If possible, discharge filter backwash water and chemically treated water to the sanitary sewer system.	X	X	X	X	X	X
2	When discharging pool water to storm water conveyance system, prior to discharge dechlorinate the water through mechanical means (e.g., <i>let sit for several days without adding chlorine</i>) or by chemical means (e.g., <i>add sodium bisulfite</i>), and neutralize all other chemicals (e.g., <i>acid wash residue</i>). Check the pH of the water to make sure that it is between 4 and 10 before discharge.	X	X	X	X	X	X
3	Water used in outdoor pressure washing should not contain detergents or surfactants. Contaminated wastewater generated from pressure washing must not be discharged to the ground or to storm water conveyances, but must be captured and discharged to the sanitary sewer.	X	X	X	X	X	X
4	Condensate generated from air conditioners or air compressors must not be discharged to the ground or storm water conveyances, but must be discharged to the sanitary sewer system.	X	X	X	X	X	X
5	Blow-down water from cooling towers must not be discharged to the ground or storm water conveyances, but must be discharged to the sanitary sewer system	X	X	X	X	X	X
Painting							
1	Drop-clothes or plastic sheeting should be used to catch paint chips.	X					X
2	Dust generated from sanding must be swept or vacuumed up. This dust should not be swept or dumped onto the ground to be exposed to storm water.	X					X
3	Paint chips and dust must be properly contained and disposed of, and should not be exposed to storm water.	X					X

BEST MANAGEMENT PRACTICE (BMP)		BUILDING	FUEL DISPENSING	FUEL STORAGE	VEHICLE IMPOUND LOT	PARKING LOT	CONTRACTOR
4	Containers of paint must not left outdoors where it could be exposed to storm water, but should be covered and kept off of the ground.	X					X
5	Waste paints and solvents must not be dumped or discharged outdoors where it would contaminated storm water, but should be properly contained and disposed of in accordance with Federal, State and local rules and regulations. Information found on the material safety data sheets for paints and solvents should be adhered to on proper storage and disposal of these products.	X					X
6	Wastewater generated from painting operations and equipment cleaning must not be dumped or discharged outdoors where it would contaminate storm water, but should be discharged to the sanitary sewer.	X					X
7	Used materials that are expendable must not be strewn outdoors where they could be exposed to storm water, but must be properly disposed of to the landfill.	X					X

TABLE 3
REGULATORY AGENCIES CONTACT INFORMATION

Regulatory Agency	Division / Department	Address	Phone Number
City of Millington	Division of Public Works	7930 Nelson Street Millington, Tennessee 38053	(901) 461-8595
Tennessee Department of Environment and Conservation	Memphis Environmental Field Office	8383 Wolf Lake Drive Bartlett, Tennessee 38133-4119	(901) 371-3000
Tennessee Department of Environment and Conservation	Headquarters	312 Rosa L. Parks Avenue Nashville, Tennessee 37243	(615) 532-0109
United States Environmental Protection Agency	Region IV	Sam Nunn Atlanta Federal Center 61 Forsyth Street, SW Atlanta, Georgia 30303-3104	(404) 562-9900
National Response Center	-----	-----	(800) 424-8802
Shelby County Emergency Management Agency	-----	1075 Mullins Station Road Building C Memphis, Tennessee 38134	(901) 458-1515
Tennessee Emergency Management Agency	-----	3041 Sidco Drive Nashville, Tennessee 37204	(800) 258-3300

APPENDIX C
SPILL REPORTS

SPILL REPORTS

Any spills that could impact storm water or drain to a storm water discharge point at this facility will be documented. The record of these events will be maintained in this *Appendix*.

Notification of a Spill

In the case of a spill of a hazardous substance that could impact storm water or drain to a storm water discharge point, this facility will notify, as soon as possible after learning of the discharge:

1. The Shelby County Emergency Management Agency, (901) 458-1515 **and**
2. The City of Memphis, (901) 576-6721

The facility may also need to notify the following government regulators, as directed:

- The National Response Center (NRC), (800) 424-8802
- The Tennessee Emergency Management Agency (TEMA), (800) 258-3300
- The Tennessee Department of Environment and Conservation, Division of Water Pollution Control- Memphis Environmental Assistance Center, (901) 368-7939

These regulators will inform you on the necessary actions to take regarding the spill.

SWPPP Review and Modification

Within 14 calendar days of the spill, the personnel listed in *Table 2* of *Appendix B* as responsible for the SWPPP will perform the following tasks:

- Provide a description of the spill, the circumstances leading to the spill, and the date of occurrence of the spill;
- Review the SWPPP to identify measures to prevent the reoccurrence of such spills and to respond to such spills;
- Modify the SWPPP where appropriate; and
- Document the findings and actions taken in this *Appendix*.

APPENDIX D
RECORD OF INSPECTION

COMPREHENSIVE SITE COMPLIANCE EVALUATION

Date: _____

Name and Title of Person Performing Evaluation: _____

1. Complete or review a recently completed Facility Inspection Checklist.
2. Complete or review a recently completed Outfall Inspection Checklist for **each** of the outfalls at the facility.

Based on the findings of the Facility Inspection and Outfall Inspections, complete the following:

Evaluate the effectiveness of measures to reduce pollutant potential at this facility.

Indicate any revisions necessary to update the Storm Water Pollution Prevention Plan for compliance.

Signature of Evaluator: _____

MANAGEMENT CERTIFICATION

I certify that I have performed this Comprehensive Site Compliance Evaluation to identify any areas of non-compliance. Based on this evaluation, I have reviewed the Storm Water Pollution Prevention Plan and revised it, if necessary, to incorporate additional pollution prevention measures and BMPs. In signing this management certification, I am verifying my commitment to help in the reduction of storm water pollution by implementing and maintaining the Best Management Practices (BMPs) specified in this Plan.

Print Name

Title

Signature

Date

FACILITY INSPECTION CHECKLIST (DRY WEATHER)

Page 1 of 2

This form is for use as part of the annual Comprehensive Site Compliance Evaluation, although the facility can be inspected more frequently, if desired.

Date: _____ Time: _____

Weather Conditions: _____

Name and Title of Person Performing Inspection: _____

Yes _____ Does your facility show signs of poor housekeeping (cluttered walkways,
No _____ un-swept floors, uncovered materials, etc.)? If yes, please explain.

Yes _____ Are there spots, puddles or other traces of oil, grease or other chemicals on the
No _____ ground or pavement, or in shipping areas or outside containment structures?
If yes, please explain. _____

Yes _____ Is there discoloration, residue, or corrosion on the roof or around vents or pipes
No _____ that ventilate or drain work or storage areas? If yes, please explain.

Yes _____ Do you see leaking equipment, pipes, containers, or lines? If yes, please explain.
No _____

Yes _____ Do storage containers show signs of corrosion or leaks? If yes, please explain.
No _____

Yes _____ Do solid waste disposal containers (dumpsters, trash compactors, garbage cans)
No _____ have debris around them, or have they been left uncovered? If yes, please explain.

Yes _____ Are containers properly labeled? If not, please indicate location of containers.
No _____

Yes _____ Is evidence of soil erosion present? If yes, please indicate where.
No _____

FACILITY INSPECTION CHECKLIST (DRY WEATHER)

Page 2 of 2

Yes _____ Are existing storm water conveyance devices (ditches, pipes, grates) operating
No _____ properly and free of leaves, debris and obstructions? If not, please explain.

Yes _____ Is spill response equipment available at appropriate locations and is the equipment
No _____ in good condition? If not, please explain.

Yes _____ Has new equipment been installed or new processes implemented at the facility?
No _____ If yes, please describe.

Yes _____ Have new containment areas or new coverings for outside storage areas been
No _____ installed? If yes, please describe.

Yes _____ Have new storm water conveyance devices been installed? If yes, please describe.
No _____

Yes _____ Have new potential pollutant sources been identified? If yes, please describe.
No _____

Other indications of potential storm water pollution noted during inspection (please describe):

Follow-up Actions Needed: _____

Signature of Inspector: _____

OUTFALL INSPECTION CHECKLIST (WET WEATHER)

Note: Complete one form for EACH outfall present at the facility. This form is for use as part of the annual Comprehensive Site Compliance Evaluation, although outfalls can be inspected more frequently, if desired.

Date: _____ Time: _____

Weather Conditions during the Inspection: _____

Name and Title of Person Performing Inspection: _____

Outfall Number and Location: _____

Yes _____ Is the outfall in good condition and can water flow freely? If not, please describe.

No _____

Yes _____ Is flow visible? If yes, complete checklist below.

No _____

Yes _____ Is standing water present? If yes, complete checklist below.

No _____

Observations regarding flowing or standing water in Outfall:

Color of water?

Odor?

Murky?

Floating objects?

Scum?

Suds or foam?

Oily (rainbow colored) sheen on surface?

Sludge present?

Stains on conveyance?

Plant life present and healthy?

Signature of Inspector: _____

CITY OF MILLINGTON**2020 EMPLOYEE STORMWATER TRAINING SCHEDULE**

Date	Training Type	Location
January 27, 2020	New Employees	City Hall – BMA Chamber
April 27, 2020	Existing Employee Renewal	City Hall – BMA Chamber
July 27, 2020	New Employees	City Hall – BMA Chamber
October 26, 2020	Existing Employee Renewal	City Hall – BMA Chamber

Employee stormwater training will be held quarterly on the last Monday of the month.

January and July training sessions will be for new employees hired since the last session.

April and October training sessions will be renewal sessions for existing employees. All City of Millington employees must participate in one training session every 5 years, regardless of their job function.