



Tennessee Department of Environment and Conservation
Division of Water Pollution Control
L & C Tower Annex, 6th Floor
401 Church Street
Nashville, Tennessee 37243

Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)

PURPOSE

The purpose of this Notice of Intent (NOI) is for a Tennessee city, county, utility district, university or military base to apply for NPDES permit to discharge stormwater runoff from a Phase II municipal separate storm sewer system.

INSTRUCTIONS

You must provide the following information to the Division of Water Pollution Control as application material. You may either submit a hard copy of the original NOI as described in sub-part 2.3 of the MS4 Permit, signed in accordance with the signatory requirements of sub-part 6.7 of the permit, and a copy of the NOI, to the address shown in sub-part 1.2 of the permit for the EFO responsible for the county where the facility is located; or you may submit by e-mail, with the completed NOI and attachments (such as map and city ordinances) to phase.two@tn.gov.

In addition, send an original, hard copy letter, signed by the responsible official of the MS4, which makes reference to the e-mail transmission including date and time that the electronic submitted was made. The letter must contain the signatory statement found on the NOI form. The letter must be mailed to the Nashville Central Office address as defined in sub-part 1.2 of the MS4 permit.

After completing the questions in each section, list the Best Management Practices (BMPs) that you will implement in each area based on a set of priorities you have identified in the area. Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

After completing the BMP's in each section provide the administrative information to complete those BMP's as explained here:

Primary Contact and Position/Title	The person in your organization serving as the primary contact.
Other Department and Roles	Other departments within your organization involved in the project and how their role is identified.
Other Government Entity and Roles	Identification of other government entities responsible for implementing one or more of the BMP's. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.
Other Institutions and Roles	Identification of partnerships with another MS4 operator or institution (e.g., Chamber of Commerce, environmental interest organizations, civic groups) to achieve the BMP's.
Target Groups (if applicable)	Specific kinds of groups that will be targeted, such as service industries (i.e., carpet cleaning), civic groups, schools, and church groups, etc.

PART I
ADMINISTRATIVE INFORMATION

Name of city, county, stormwater utility district or other public institution that operates a Phase II MS4: Tennessee Technological University

Dr. Claire Stinson

Responsible Elected Official or Officer

Vice President for Business and Fiscal Affairs

Title

1 William L Jones Drive

Street Address

Cookeville

City

TN

State

38505

Zip Code

Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)

CN-1295 (Rev 10-10)

RDA 1663

**Phase II Stormwater Permit Notice of Intent (NOI)
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PROGRAM CONTACT
Kent Clawson
Name
kclawson@tntech.edu
Email Address
(931) 372-3587
Phone Number

TECHNICAL CONTACT
Kent Clawson
Name
kclawson@tntech.edu
Email Address
(931) 372-3587
Phone Number

Attach an organizational chart that shows the different departments involved in stormwater management.

**PART II
DESCRIPTION OF STORM SYSTEM**

**ITEM A
AREA SERVED (IN SQUARE MILES)**

If city, town, university, or utility district: Give jurisdiction area within current corporate boundaries 247 ac
 If city, town, university, or utility district: Give additional area of urban growth boundary N/A
 If county: Give total area _____ Area unincorporated _____ Unincorporated, urbanized area (UA) _____
 If county, indicate by checking the appropriate box if the permit will be used to regulate non-UA portions of your county:
 Entire county (unincorporated) Non-UA portions, as follows (describe below)

**ITEM B
STORM DRAINAGE INFRASTRUCTURE**

Give figures for the following features of stormwater drainage infrastructure owned or operated by the local government. For a county government, indicate whether the figures represent the entire county or only the urbanized area. Figures for length and number of culverts and catch basins may be rough estimates.

For counties: Entire county Urbanized area only

Storm Sewers	<u>56614'</u> (miles, or feet)	Open Ditches	<u>300'</u> (miles, or feet)
Culverts	<u>0</u>	Catch Basins	<u>290</u>
Retention Basins	<u>2</u>	Detention Basins	<u>0</u>

**ITEM C
MAPS**

Please include a map or maps depicting the following information. A single map may be submitted, as long as the information is legible. If you are not able to provide all the information please mark the applicable check box and attach an explanation as to why the information has not been submitted:

- | | | | |
|--|-------------------------------------|--|-------------------------------------|
| Zoned areas for commercial or industrial activity | <input checked="" type="checkbox"/> | State vocational, technical, college or universities | <input type="checkbox"/> |
| Actual areas of commercial or industrial activity | <input checked="" type="checkbox"/> | Federal vocational, technical, college or universities | <input checked="" type="checkbox"/> |
| Other municipally owned/operated industrial activities | <input checked="" type="checkbox"/> | City Roads | <input type="checkbox"/> |
| Municipal or County Wastewater Treatment Plants | <input checked="" type="checkbox"/> | County Roads | <input type="checkbox"/> |
| Vehicle Fleet Maintenance Centers | <input type="checkbox"/> | Perennial and intermittent streams | <input checked="" type="checkbox"/> |
| Power Plants | <input checked="" type="checkbox"/> | Topography or Drainage Patterns | <input type="checkbox"/> |
| Airports | <input checked="" type="checkbox"/> | Landfills | <input checked="" type="checkbox"/> |
| Military Installations | <input checked="" type="checkbox"/> | | |

**Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)**

**ITEM D
IDENTIFYING IMPAIRED STREAMS AND OTHER WATER BODIES**

Using the GIS mapping tool (<http://tnmap.tn.gov/wpc/>) along with the most current 303(d) list published on the division's web site (<http://www.tn.gov/environment/wpc/publications/#wqassessment>), identify whether stormwater discharges from any part of the MS4 contribute pollutants of concern to an impaired waterbody and list below: For any impairment, indicate the waterbody ID#, name of impacted waterbody, nature of pollution (cause), and the source. If you have additional streams to list, please include in a separate attachment.

WATERBODY ID# AND NAME OF IMPACTED WATERBODY	CAUSE OF IMPAIRMENT	SOURCE OF IMPAIRMENT
TN05130108045_0150	sediment, habitat alteration	MS4 discharges, grazing
*Note that TTU's campus does not discharge directly into Cane Creek. It discharges into Cookeville's MS4 and then into Cane Creek.		

**ITEM E
HAS THE STATE OR EPA ISSUED A TMDL FOR ANY STREAMS DIRECTLY AFFECTED BY RUNOFF FROM YOUR MS4?**

Determine whether or not a TMDL has been established and approved by EPA and identify by checking the appropriate box. A list of EPA-Approved TMDLs as well as EPA-Established TMDLs for Tennessee waters can be found on the division's web site (<http://www.tn.gov/environment/wpc/tmdl/approved.shtml>).

Yes No If yes, list the waterbody ID#, name of impacted waterbody and parameter(s) of concern:

WATERBODY ID# AND NAME OF IMPACTED WATERBODY	PARAMETERS OF CONCERN

If you have additional streams to list, please include in a separate attachment.

**PART III
EXISTING LEGAL AUTHORITY TO CONTROL STORMWATER DISCHARGES TO MS4**

You must review ordinances that are associated with stormwater discharges to your MS4. Attach a copy of ordinances that give your MS4 the authority to control stormwater discharges into the MS4 storm sewer system. Ordinances that deal with stormwater

Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)

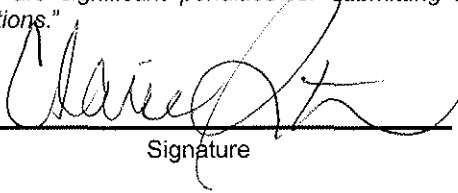
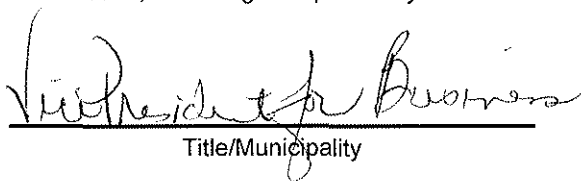

issues might be found, for example, in conjunction with litter control, prohibition of dumping, clean up of spills, grading/building permits, sewer connection ordinances, erosion and sediment practices, subdivision regulations or other land use/development ordinances.

PART IV SIGNATURE OF RESPONSIBLE CORPORATE OFFICER

This Notice of Intent (NOI) must be signed as follows: For a municipality, state, federal, other public agency, and/or co-permittees by either a principal executive officer or ranking elected official. For purposes of this section, a principal executive officer of a Federal agency includes one of the following:

- i. The chief executive officer of the agency.
- ii. A senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., Regional Administrators of EPA).

"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."

 _____ Signature	 _____ Title/Municipality	 _____ Date
_____ Signature	_____ Title/Municipality	_____ Date
_____ Signature	_____ Title/Municipality	_____ Date
_____ Signature	_____ Title/Municipality	_____ Date
_____ Signature	_____ Title/Municipality	_____ Date
_____ Signature	_____ Title/Municipality	_____ Date

(Go to next page.)

PART V
YOUR PROPOSED STORMWATER QUALITY MANAGEMENT PROGRAM

This NOI requires you to provide a brief description of your current and proposed activities as well as your Best Management Practices (BMPs) for a stormwater management program. The following sections correspond to the six minimum control measures for a Phase II stormwater management program. If another MS4 will be responsible for implementing any or all portions of any or all following six minimum measures, then attach either the interlocutory agreement or the proposed agreement and schedule for adoption. You must still complete this NOI by answering the relevant questions for the six following measures.

For purposes of this NOI, the Public Education and Outreach and Public Participation and Involvement minimum measures have been combined.

SECTION 1
PUBLIC EDUCATION AND OUTREACH AND PUBLIC INVOLVEMENT/PARTICIPATION

A. Current Activities:

The following is a set of questions on your current Public Education and Outreach and Public Involvement/Participation. These questions are intended to highlight minimum program requirements under the MS4 permit. For MS4s who have not been previously covered under an MS4 permit, each element not currently performed must be implemented by the dates identified in Sub-part 4.1.1. of the permit. Thus, each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

1. Does the municipality currently distribute educational materials on the topics of stormwater quality, stream water quality, pollution impacts, pollution prevention, etc.? If yes, briefly describe the materials, including media used (e.g., written brochures, public service announcements, etc.); the topic(s) covered, intended target audience(s), and the distribution method.

Yes The Water Center on TTU campus has developed and distributed small posters focusing on water quality in the past.
No

2. Does the municipality currently conduct or participate in public outreach activities focusing on the topics of stormwater quality, stream water quality, pollution impacts, pollution prevention, etc.? If yes, briefly describe the outreach activities, topic(s) covered, intended target audience(s), and the frequency of activities.

Yes
No

3. Does the current municipal stormwater management program comply with Local, State and Federal public notice requirements? If yes, describe how the public is notified.

Yes
No TTU is a state university and doesn't develop or adopt ordinances. Therefore, they do not have to comply with state and local public notice requirements.

B. Proposed Activities:

List the BMPs that you will implement in the areas of Public Education and Outreach and Public Participation and Involvement. These should be based on a set of priorities that you have identified in the areas of Public Education and Outreach and Public Participation and Involvement. Provide a short descriptive name to the BMP in the left column. In the right column, more fully describe the BMP.

For Public Participation and Involvement BMPs, you may not desire to dictate the ways in which the public participates or is involved in the stormwater quality management program; in this case, your proposed program should provide a forum and a structure by which to encourage or allow the public to participate. On the other hand, there may be specific ways you do want the public to be involved, based on your program needs. For instance, you may want stream watch groups to be organized. As such, your proposed program should describe how you will accomplish this, and the time schedule.

PROPOSED BEST MANAGEMENT PRACTICES FOR PUBLIC EDUCATION AND PUBLIC PARTICIPATION		
BMP	Name	DESCRIPTION
1A.	PIE Plan	Develop a Public Information and Education Plan (PIE) that details specific goal and specific public information events/activities that will occur throughout the permit cycle.
1B.	Website	Create a stormwater website to advertise volunteer activities identified in the PIE as well as include any stormwater articles; for pollution prevention tips; and for the complaint reporting mechanism.
1C.	Storm marking drain	Develop storm drain marking program that involves students, staff and faculty. Coordinate with the City of Cookeville
1D.	Tracking	Develop a method to track public education, involvement and participation activities.

**Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)**

If you have additional BMPs to list, please include in a separate attachment.

What specific groups will be targeted (e.g., service industries such as carpet cleaning, lawn care, civic groups, schools, church groups) if applicable:

Staff, faculty and students

C. Measurable Goals and Implementation Milestones

Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

D. Administrative Information

ADMINISTRATIVE INFORMATION FOR PUBLIC EDUCATION AND PUBLIC PARTICIPATION	
PRIMARY CONTACT	POSITION OR TITLE
Kent Clawson	EH&S Coordinator

Identify other Department(s) that will be involved and their role.

OTHER DEPARTMENT(S)	ROLE

Identify if you will partner with another MS4 Operator, or with another institution (e.g. Chamber of Commerce, Environmental interest organizations, civic groups) in order to carry out the chosen BMPs.

ENTITY	BMP
City of Cookeville	TTU will coordinate with Cookeville on storm drain marking, as feasible and appropriate.

Will another governmental entity be responsible for implementing one or more chosen BMPs? If so, identify the entity and which BMP(s) it will implement. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.

ENTITY	BMP

**SECTION 2
ILLICIT DISCHARGE DETECTION AND ELIMINATION**

The following are common sources of illicit discharges to an MS4:

- Sanitary Wastewater
- Effluent from septic tanks
- Car wash wastewaters
- Improper oil disposal
- Radiator flushing disposal
- Laundry Wastewaters/gray water
- Spills from roadway accidents
- Improper disposal of auto and household toxics
- Carpet cleaning wastewaters

A. Current Activities

The following is a set of questions on your current Illicit Discharge Detection and Elimination Program. These questions are intended to highlight minimum program requirements under the MS4 permit. For MS4s who have not been previously covered under

Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)

an MS4 permit, each element not currently performed must be implemented by the dates identified in Sub-part 4.1.1. of the permit. Thus, each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

STORM SEWER SYSTEM MAP

Does the municipality currently have a storm sewer system map completed for the entire regulated municipal separate storm sewer system? The map must depict, at a minimum: city streets, topography or drainage patterns, streams, and outfalls (points where the city or county-operated MS4 discharges into the streams or adjacent MS4s).

Yes No

ILLCIT DISCHARGE ORDINANCES

1. Does the municipality currently have an ordinance or regulatory mechanism that prohibits non-stormwater discharges into the storm sewer system? If yes, please attach a copy of the ordinance and give page number(s) of this section of ordinance. If No, proceed to the next section (inspections and enforcement).

Yes No _____ Page Number _____ Ordinance Section Number

2. Does the ordinance or regulatory mechanism clearly define non-stormwater discharges, either through a written description of a non-stormwater discharge or through a listing of unallowable or allowable non-stormwater discharges?

Yes No

3. Does the ordinance or regulatory mechanism allow right-of-entry on private property for inspection of suspected discharges?

Yes No

4. Does the ordinance or regulatory mechanism prohibit dumping?

Yes No

5. Does the ordinance or regulatory mechanism give the MS4 owner/operator the authority to eliminate non-stormwater discharges in the event of violations? If yes, please note page number and paragraph number.

Yes No _____ Page Number _____ Paragraph Number

6. Does the ordinance or regulatory mechanism define penalties for violations? If yes, please note maximum penalty, page number and paragraph number.

Yes No \$ _____ Maximum Penalty _____ Page Number _____ Paragraph Number

7. Does the municipality have ordinance or other regulatory mechanism that prohibits contamination of stormwater runoff from "hot spots" including industrial and commercial properties, restaurants, auto repair shops, auto supply shops, and large commercial parking areas?

Yes No

INSPECTION/SCREENING AND ENFORCEMENT PROCEDURES

1. Does the municipality presently have personnel and procedures in place for inspection and/or screening for non-stormwater discharges? If yes, please describe and indicate percentage of system inspected and/or screened.

Yes No _____

2. Does the municipality presently have procedures and personnel in place for enforcement of violations of the illicit discharge ordinance? If yes, please describe.

Yes No _____

3. How are enforcement actions documented?

N/A

4. Has the municipality defined "hot spots" for non-stormwater discharge screening and inspections? If yes, please describe and provide a map of illicit discharge screening hot spots.

**Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)**

Yes
No

PUBLIC INPUT AND COMPLAINTS

1. Does the municipality presently have procedures in place to receive and consider information and complaints about non-stormwater discharges that are submitted by the public? If so, provide brief description: responsible departments, personnel, steps followed.

Yes
No

EDUCATION

1. Has the municipality educated the public and businesses including auto parts supply, auto repair shop and restaurants, regarding ways to detect, prevent and eliminate illicit discharges? If yes, briefly describe the educational materials, including media used (e.g., written brochures, public service announcements, etc.), the topic(s) covered, intended target audience(s), and the distribution method.

Yes
No

B. Proposed Activities:

List the best management practices (BMPs) that you will implement in the area of Illicit Discharge Detection and Elimination. These should be based on a set of priorities that you have identified in the area of Illicit Discharge Detection and Elimination. Provide a short descriptive name to the BMP in the left column and more description in the right column.

PROPOSED BEST MANAGEMENT PRACTICES FOR ILLICIT DISCHARGE DETECTION AND ELIMINATION		
BMP	Name	DESCRIPTION
2A.	Policy	Develop an administrative policy prohibiting non-stormwater discharges and illegal dumping. Distribute the policy to all staff, faculty and students
2B.	ERP	Develop and implement an Enforcement Response Plan (ERP). The ERP must 1) establish a timeframe and plan of action for responding to illicit discharges, when found; 2) establish a timeframe and plan of action for responding to citizen complaints; and 3) identify a point of contact for all enforcement actions.
2C.	Policies and Procedures for ID screening	Develop policies and procedures for screening, tracking and identifying sources of illicit discharges, including the identification of hotspot landuses. The policies and procedures must also address coordination with emergency response agencies, such as TN Emergency Management Agency and local emergency management agencies for spills and hazardous materials cleanup, when appropriate.
2D.	Mapping	Maintain a storm sewer system map for the campus

If you have additional BMPs to list, please include in a separate attachment.

What specific groups will be targeted, if applicable?

Staff, faculty and students

C. Measurable Goals and Implementation Milestones

Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

D. Administrative Information

ADMINISTRATIVE INFORMATION FOR ILLICIT DISCHARGE DETECTION AND ELIMINATION	
PRIMARY CONTACT	POSITION OR TITLE
Kent Clawson	EH&S Coordinator

Identify other Department(s) that will be involved and their role.

**Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)**

OTHER DEPARTMENT(S)	ROLE
Facilities and Business Services	Stormwater system mapping, Outfall screening

Identify if you will partner with another MS4 Operator, or with another institution (e.g. Chamber of Commerce, Environmental interest organizations, civic groups) in order to carry out the chosen BMPs.

ENTITY	BMP

Will another governmental entity be responsible for implementing one or more chosen BMPs? If so, identify the entity and which BMP(s) it will implement. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.

ENTITY	BMP

**SECTION 3
CONSTRUCTION SITE STORMWATER RUNOFF PROGRAM**

A. Current Activities

The following is a set of questions on your current Construction Site Stormwater Runoff Program. These questions are intended to highlight minimum program requirements under the MS4 permit. For MS4s who have not been previously covered under an MS4 permit, each element not currently performed must be implemented by the dates identified in Sub-part 4.1.1. of the permit. Thus, each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

CONSTRUCTION SITE RUNOFF ORDINANCES

1. Do the current ordinances/regulations for the municipal stormwater management program comply with Local, State and Federal public notice requirements? If yes, describe how the public is notified.

Yes No TTU is a state university and doesn't develop or adopt ordinances. Therefore, they do not have to comply with state and local public notice requirements.

2. Do you currently have an erosion prevention and sediment control - or similar - ordinance or regulatory mechanism? If yes, include a copy and reference the page number(s). If No, proceed to the next set of questions below about construction site plans review.

Yes No 18 Page Number

3. Does the ordinance or regulatory mechanism require that site operators implement erosion prevention, sediment control, and other construction waste controls for land disturbance activities?

Yes No

4. Does the ordinance/regulatory mechanism require (explicitly or implicitly) that controls be implemented for any land disturbances greater than or equal to one acre, or less than one acre if part of a large common plan of development or sale that would disturb one acre or more? If yes, note the page number and paragraph number where this is defined.

Yes No Page Number Paragraph Number

5. Does the ordinance or regulatory mechanism contain or reference technical standards for erosion and sediment control? If yes, note the page number and paragraph number where this is defined.

Yes No Page Number Paragraph Number

6. Do those technical standards meet or exceed the current effective Tennessee Construction General Permit (TNR100000) requirements for design storm and special conditions for impaired waters or exceptional waters?

**Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)**

Yes

No

7. Do those technical standards require that construction activities maintain temporary water quality buffers during construction?

Yes

No

8. Does the ordinance or regulatory mechanism clearly define the criteria - primarily who must submit - for submitting erosion and sediment control information or plans? If yes, note page number and paragraph number

Yes No

Page Number _____

Paragraph Number _____

9. Does the ordinance or regulatory mechanism require approval by the local government prior to commencement of land disturbance activities? If yes, note page number and paragraph number.

Yes No

Page Number _____

Paragraph Number _____

10. Does the ordinance or regulatory mechanism require re-submittal of erosion and sediment control information or plans if site plans or conditions change during land disturbance activities? If yes, note page number and paragraph number.

Yes No

Page Number _____

Paragraph Number _____

11. Does the ordinance or regulatory mechanism allow right-of-entry for government officials onto construction sites for inspections? If yes, note page number and paragraph number.

Yes No

Page Number _____

Paragraph Number _____

12. Does the ordinance or regulatory mechanism give the MS4 owner/operator the authority to STOP WORK in the event of non-compliance violations? If yes, note page number and paragraph number.

Yes No

Page Number _____

Paragraph Number _____

CONSTRUCTION SITE PLANS REVIEW

1. Does the municipality presently have in place a technical review process (i.e. engineering department, planning department, zoning board) that evaluates new development and redevelopment construction for construction site runoff?

Yes

No

2. Does the technical review process require an erosion prevention and sediment control plan with appropriate BMPs?

Yes

No

3. Does the review process include a requirement for pre-construction meeting between the municipality and site developer, for priority construction sites, including at a minimum those construction activities discharging directly into, or immediately upstream of, waters the state recognizes as impaired or exceptional?

Yes

No

4. If there is a review process, provide a brief narrative or a flow chart of the process, describing the process steps, responsible personnel (by department, title and contact person), and criteria used for evaluation of information or plans that are submitted.

Currently, TBR required the A/E firm over the project to handle all permits, including coverage under the CGP. The plans are only reviewed based upon completeness. TTU can provide input but does not have review authority at this time.

RESPONDING TO PUBLIC INPUT AND COMPLAINTS

1. Does the municipality presently have procedures in place for receipt and consideration of information and complaints submitted by the public?

Yes

No

If Yes, please provide a brief narrative of the receipt process and procedures, describing process steps, responsible departments, and personnel (by title). If available, provide information on complaint tracking, documentation, etc:

ENFORCEMENT AND INSPECTION PROCEDURES

1. Does the municipality presently have personnel and procedures in place for construction site runoff inspection?

Yes

No

2. Does the program provide for pre-construction meeting and monthly inspection of priority sites?

Yes

No

3. Does the municipality presently have procedures and personnel in place for enforcement to the maximum extent for violations of construction site requirements?

**Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)**

Yes

No

4. Does the municipality use a STOP WORK order to enforce non-compliance with construction site policies and requirements?

Yes

No

5. How are enforcement actions documented?

--

TRAINING AND EDUCATION

1. Does the municipality presently make construction site runoff control training/information available to the public, developers, engineers, and contractors? (Be aware that the state of Tennessee regularly conducts erosion prevention and sediment control classes across the state. Local governments are encouraged to refer developers and contractors to these classes).

Yes

No

2. Has municipal staff completed state-sponsored training, including the Tennessee Fundamentals of Erosion Prevention and Sediment Control; and the Erosion Prevention and Sediment Control Design Course?

Yes

No

B. Proposed Activities:

List the best management practices (BMPs) that you will implement in the area of Construction Site Runoff Program. These should be based on a set of priorities that you have identified in the area of Construction Site Runoff Program. Provide a short descriptive name to the BMP in the left column and more description in the right column.

PROPOSED BEST MANAGEMENT PRACTICES FOR CONSTRUCTION SITE RUNOFF PROGRAM		
BMP	Name	DESCRIPTION
3A.	Contract modification	Modify contract language requiring contractors to implement stormwater pollution prevention plan (SWPPP) controls and obtain a Notice of Coverage (NOC) from TDEC.
3B.	SWPPP review	Develop and implement a SWPPP review process to determine the completeness and overall BMP effectiveness.
3C.	Technical guidance	Develop or reference technical guidance materials for design of SWPPPs that is at least as restrictive as the TN CGP.
3D.	Inspection process	Develop and implement an inspection program to conduct inspections on construction projects disturbing one acre or more to evaluate construction site compliance. Develop a site inspection checklist to ensure that construction projects are complying with the requirements of the construction site runoff control program.

If you have additional BMPs to list, please include in a separate attachment.

What specific groups will be targeted, if applicable?

Contractors and designers

C. Measurable Goals and Implementation Milestones

Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

D. Administrative Information

ADMINISTRATIVE INFORMATION FOR CONSTRUCTION SITE RUNOFF PROGRAM	
PRIMARY CONTACT	POSITION OR TITLE
Kent Clawson	EH&S Coordinator

Identify other Department(s) that will be involved and their role.

OTHER DEPARTMENT(S)	ROLE
Facilities and Business Services	Contractor coordination and management. Evaluation of projects and contract execution.

**Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)**

Identify if you will partner with another MS4 Operator, or with another institution (e.g. Chamber of Commerce, Environmental interest organizations, civic groups) in order to carry out the chosen BMPs.

ENTITY	BMP

Will another governmental entity be responsible for implementing one or more chosen BMPs? If so, identify the entity and which BMP(s) it will implement. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.

ENTITY	BMP

**SECTION 4
PERMANENT (POST-CONSTRUCTION) STORMWATER MANAGEMENT
IN NEW DEVELOPMENT AND REDEVELOPMENT PROGRAM**

A. Current Activities

The following is a set of questions on your current Permanent Stormwater Management in New Development and Redevelopment Program. These questions are intended to highlight minimum program requirements under the MS4 permit. For MS4s who have not been previously covered under an MS4 permit, each element not currently performed must be implemented by the dates identified in Sub-part 4.1.1. of the permit. Thus, each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

STRUCTURAL AND NON-STRUCTURAL STRATEGIES

1. Does the municipality currently have in place mechanisms or strategies to address permanent stormwater runoff management from new development or redevelopment projects that result in land disturbance of one acre or more? For example, land use planning requirements, zoning directives, site-based local controls such as riparian buffer zone protection; storage or detention of stormwater prior to release to streams; practices to cause stormwater to percolate the soil rather than runoff immediately; vegetative practices.

Yes No

If Yes, please provide a brief narrative of - and/or references to - the structural and non-structural strategies, describing strategies implemented, Best Management Practices allowed, technical guidance, responsible departments, and personnel (by title).

PERMANENT STORMWATER CONTROLS SITE MANAGEMENT ORDINANCE

1. Do you currently have an ordinance or regulatory mechanism that addresses permanent stormwater runoff management from new development and redevelopment projects? If yes, reference the page number in your ordinance. If No, proceed to the next section on permanent stormwater management plans review.

Yes No _____ Page Number _____ Paragraph Number

2. Does the ordinance or regulatory mechanism require controls to mitigate pollutants in stormwater runoff? If yes, note page number and paragraph number.

Yes No _____ Page Number _____ Paragraph Number

3. Does the ordinance or regulatory mechanism require (explicitly or implicitly) that controls be implemented for any new development or redevelopment projects greater than or equal to one acre, including projects less than one acre that are part of a large common plan of development or sale, that discharge into your small MS4? If yes, note page number and paragraph number.

**Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)**

Yes No _____ Page Number _____ Paragraph Number

4. Does the ordinance or regulatory mechanism contain or reference technical standards for water quality controls (e.g., design of detention basins)? If yes, note page number and paragraph number.

Yes No _____ Page Number _____ Paragraph Number

5. Does the ordinance or regulatory mechanism clearly define the criteria for submittal -who must submit - of permanent stormwater management design information or plans? If yes, note page number and paragraph number.

Yes No _____ Page Number _____ Paragraph Number

6. Does the ordinance or regulatory mechanism require approval prior to construction of permanent stormwater management controls? If yes, note page number and paragraph number.

Yes No _____ Page Number _____ Paragraph Number

7. Does the ordinance or regulatory mechanism require re-submittal of permanent stormwater management design information or plans if site plans change after the initial design has been approved? If yes, please note page number and paragraph number.

Yes No _____ Page Number _____ Paragraph Number

8. Does the ordinance or regulatory mechanism give the MS4 owner/operator the authority to penalize the owner of permanent stormwater management controls for violations? If yes, note page number and paragraph number.

Yes No _____ Page Number _____ Paragraph Number

9. Does the ordinance or regulatory mechanism allow the municipality right-of-entry on property where permanent stormwater management controls are installed for inspections? If yes, please note page number and paragraph number.

Yes No _____ Page Number _____ Paragraph Number

10. Does the ordinance or regulatory mechanism require that permanent stormwater management controls have adequate and long-term operation and maintenance? If yes, please note page number and paragraph number. If no, how does the MS4 owner/operator maintain permanent stormwater management controls?

Yes
No

11. Does the ordinance or regulatory mechanism require establishment and maintenance of water quality buffers in areas of new development and redevelopment?

Yes No

PERMANENT STORMWATER MANAGEMENT PLANS REVIEW

1. Does the municipality presently have in place a technical review process (i.e. engineering department, planning department, zoning board) that evaluates new development and redevelopment with regard to the impact that permanent stormwater runoff will have on receiving streams?

Yes No

If Yes, provide a brief narrative or a flow chart of the review process, describing the process steps, responsible personnel (by department, title and contact person), and criteria used for evaluation of information or plans that are submitted.

B. Proposed Activities:

List the best management practices (BMPs) that you will implement in the area of the Permanent Stormwater Management Plans Review Program. These should be based on a set of priorities that you have identified in the area of the Permanent Stormwater Management Plans Review Program. Provide a short descriptive name to the BMP in the left column and more description in the right column.

PROPOSED BEST MANAGEMENT PRACTICES FOR PERMANENT STORMWATER MANAGEMENT PLANS REVIEW		
BMP	Name	DESCRIPTION

**Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)**

4A.	Buffers		Develop and implement a set of requirements to establish, protect and maintain a permanent water quality buffer along all waters of the state at sites disturbing one acre or more.
4B.	Permanent Controls	SW	Modify contracts to require permanent stormwater management practices on projects that disturb 1 acre or more.
4C.	Technical guidance		Adopt technical guidance documents for use in the design of permanent stormwater management practices. The technical guidance will include the following design criteria: runoff reduction of the first 1 inch of runoff; 80% total suspended solids removal, and no net increase in runoff.
4D.	Plan review		Review new construction plans for sites that disturb one acre or more to ensure permanent stormwater management practices have been addressed.

If you have additional BMPs to list, please include in a separate attachment.

What specific groups will be targeted, if applicable?

Designers, contractors

C. Measurable Goals and Implementation Milestones

Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

D. Administrative Information

ADMINISTRATIVE INFORMATION FOR PERMANENT STORMWATER MANAGEMENT PLANS REVIEW	
PRIMARY CONTACT	POSITION OR TITLE
Kent Clawson	EH&S Coordinator

Identify other Department(s) that will be involved and their role.

OTHER DEPARTMENT(S)	ROLE
Facilities and Business Services	Design standard revision, BMP inspection and maintenance

Identify if you will partner with another MS4 Operator, or with another institution (e.g. Chamber of Commerce, Environmental interest organizations, civic groups) in order to carry out the chosen BMPs.

ENTITY	BMP

Will another governmental entity be responsible for implementing one or more chosen BMPs? If so, identify the entity and which BMP(s) it will implement. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.

ENTITY	BMP

**SECTION 5
POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS**

A. Current Activities

The following is a set of questions on your current Pollution Prevention/Good Housekeeping for Municipal Operations Program. These questions are intended to highlight minimum program requirements under the MS4 permit. For MS4s who have not been

**Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)**

previously covered under an MS4 permit, each element not currently performed must be implemented by the dates identified in Sub-part 4.1.1. of the permit. Thus, each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

STAFF EDUCATION AND TRAINING

1. Does the municipality's current operation and maintenance program provide annual training for staff on preventing and reducing stormwater pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance?

Yes No

2. Are training activities documented? If yes, please describe training and method of record-keeping.

Yes No N/A

MUNICIPAL OPERATIONS POLLUTION PREVENTION

1. Does the municipality's operations and maintenance program have policies and procedures in place that address pollution prevention? If yes, please describe procedures. Consider the following in your response: maintenance activities, maintenance schedules; long term inspection procedures for structural and non-structural stormwater controls to reduce floatables and other pollutants; controls for reducing or eliminating the discharge of pollutants from streets, roads, highways; controls for reducing or eliminating pollutants from municipal parking lots, maintenance and storage yards, fleet or maintenance areas with outdoor storage areas, salt/sand storage areas, snow disposal areas, waste transfer stations; disposal of waste removed from storm sewers and the areas listed above; and assessment of impacts on water quality from new flood management projects.

Yes No While the campus performs maintenance on their stormwater system, it has typically been flood or aesthetics related. The campus does not have written guidance on maintenance policies.

MUNICIPAL INDUSTRIAL ACTIVITIES

1. Has the MS4 owner/operator obtained a Tennessee Multi-Sector General Permit or a no-exposure waiver for all qualifying municipal industrial activities? If yes, please give permit numbers or attach copies of the No-Exposure Certification form.

Yes No Tnr05 4146 Permit Numbers(s)

2. List municipally-owned or operated facilities that have a notable potential for contaminating runoff: for example - vehicle maintenance garages; waste transfer operations; golf courses; salt or other materials storage; landfill. If more than one facility for a given type of operation; give the number of such facilities. Indicate if any of these are covered by an NPDES permit. Is there a documented pollution prevention plan in place for these facilities?

FACILITY OR TYPE OF OPERATION	NUMBER OF FACILITIES	IS ACTIVITY COVERED BY NPDES PERMIT?	IS A POLLUTION PREVENTION PLAN IN EFFECT?
Garage	1	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Heating plant	1	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
		Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
		Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>

B. Proposed Activities:

List the best management practices (BMPs) that you will implement in the area of the Pollution Prevention and Housekeeping Program. These should be based on a set of priorities that you have identified in the area of the Pollution Prevention and Housekeeping Program. Provide a short descriptive name to the BMP in the left column and more description in the right column.

In addition to considering industrial-type operations, you must also consider municipal infrastructure, and related maintenance activities, maintenance schedules and long-term inspection procedures for structural controls and the proper disposal of waste from storm sewers/catch basins, etc. Also included in this program area is discharge of pollutants from roads and parking lots

**Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)**

PROPOSED BEST MANAGEMENT PRACTICES FOR POLLUTION PREVENTION AND HOUSEKEEPING		
BMP	Name	DESCRIPTION
5A.	Review Grounds policies and procedures	Review policies and procedures related to grounds maintenance activities. Identify policies and procedures that should be modified to decrease the potential for negatively impacting stormwater runoff from grounds maintenance activities.
5B.	Develop written policies - Grounds	Revise policies and procedures identified in A above and develop written policies to be used in staff training.
5C.	Training Grounds -	Include training on the revised policies and procedures during quarterly training by supervisors.
5D.	Garage	Evaluate practices at the garage to determine if additional controls or practices are needed to minimize the potential for negatively impacting stormwater quality

If you have additional BMPs to list, please include in a separate attachment.

What specific groups will be targeted, if applicable?

Staff, faculty and students

C. Measurable Goals and Implementation Milestones

Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

D. Administrative Information

ADMINISTRATIVE INFORMATION FOR POLLUTION PREVENTION AND HOUSEKEEPING	
PRIMARY CONTACT	POSITION OR TITLE
Kent Clawson	EH&S Coordinator

Identify other Department(s) that will be involved and their role.

OTHER DEPARTMENT(S)	ROLE
Facilities and Business Services	Review/ development of grounds and garage related activities

Identify if you will partner with another MS4 Operator, or with another institution (e.g. Chamber of Commerce, Environmental interest organizations, civic groups) in order to carry out the chosen BMPs.

ENTITY	BMP

Will another governmental entity be responsible for implementing one or more chosen BMPs? If so, identify the entity and which BMP(s) it will implement. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.

ENTITY	BMP

**Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)**

**ADDENDUM TO SMALL MS4 NPDES PERMIT NOTICE OF INTENT
BEST MANAGEMENT PRACTICES (BMPs) MEASURABLE GOALS AND MILESTONES**

The purpose of this addendum is to record the measurable goals for each BMP, and the dates (month and year) by which interim actions are to be accomplished. Space is given for four BMPs for each of the six minimum measures. If necessary, please attach additional BMP MEASURABLE GOALS AND MILESTONES as a separate attachment.

Measurable goals are BMP design objectives, or goals that will quantify the progress of implementing the actions or performance of a BMP. They are ways to measure activities or effects of a BMP. For each of the six minimum measures and for each BMP, define the measurable goal you will use to monitor effectiveness of this BMP. The BMPs you list here should match exactly those given in Part V., 1-5 of this NOI. For purposes of this NOI, the Public Education and Outreach and Public Involvement/Participation minimum measures have been combined.

For each BMP, establish milestones for implementation. These tables are set up for once/year milestones. You may change the milestone dates to time frames less than one year.

BEST MANAGEMENT PRACTICES FOR PUBLIC EDUCATION AND PUBLIC PARTICIPATION	
BMP 1A	MEASURABLE GOALS AND MILESTONES
Goal(s)	Develop a Public Information and Education Plan (PIE) that details specific goal and specific public information events/activities that will occur throughout the permit cycle
Milestone Year 1	PIE developed and included in annual report.
Milestone Year 2	PIE implemented.
Milestone Year 3	PIE implemented.
Milestone Year 4	PIE implemented.
Milestone Year 5	PIE implemented.
BMP 1B	MEASURABLE GOALS AND MILESTONES
Goal(s)	Create a stormwater website to advertise volunteer activities identified in the PIE as well as include any stormwater articles; for pollution prevention tips; and for the complaint reporting mechanism
Milestone Year 1	Develop the website within 180 days of permit issuance.
Milestone Year 2	Keep website updated as new activities are identified.
Milestone Year 3	Keep website updated as new activities are identified.
Milestone Year 4	Keep website updated as new activities are identified.
Milestone Year 5	Keep website updated as new activities are identified.
BMP 1C	MEASURABLE GOALS AND MILESTONES
Goal(s)	Develop storm drain marking program that involves students, staff and faculty. Coordinate with the City of Cookeville
Milestone Year 1	
Milestone Year 2	
Milestone Year 3	
Milestone Year 4	Mark at least 25 drains.
Milestone Year 5	Mark at least 25 drains.
BMP 1D	MEASURABLE GOALS AND MILESTONES
Goal(s)	Develop a method to track public education, involvement and participation activities.
Milestone Year 1	Public involvement and participation activities tracked
Milestone Year 2	Public involvement and participation activities tracked
Milestone Year 3	Public involvement and participation activities tracked
Milestone Year 4	Public involvement and participation activities tracked
Milestone Year 5	Public involvement and participation activities tracked

BEST MANAGEMENT PRACTICES FOR ILLICIT DISCHARGE DETECTION AND ELIMINATION

**Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)**

MEASURABLE GOALS AND MILESTONES	
BMP 2A	
Goal(s)	Develop an administrative policy prohibiting non-stormwater discharges and illegal dumping. Distribute the policy to all staff, faculty and students.
Milestone Year 1	
Milestone Year 2	Within 18 mos of permit issuance: <ul style="list-style-type: none"> - Policy finalized and adopted to prohibit illicit discharges - Email policy to all staff and faculty - Place a copy of the policy on the stormwater website Maintain copy of policy on the stormwater website
Milestone Year 3	Maintain copy of policy on the stormwater website
Milestone Year 4	Maintain copy of policy on the stormwater website
Milestone Year 5	Maintain copy of policy on the stormwater website
MEASURABLE GOALS AND MILESTONES	
BMP 2B	
Goal(s)	Develop and implement an Enforcement Response Plan (ERP). The ERP must 1) establish a timeframe and plan of action for responding to illicit discharges, when found; 2) establish a timeframe and plan of action for responding to citizen complaints; and 3) identify a point of contact for all enforcement actions.
Milestone Year 1	
Milestone Year 2	Within 18 mos of permit issuance <ul style="list-style-type: none"> - ERP developed and implemented - Staff conducting enforcement trained on ERP
Milestone Year 3	Implement ERP
Milestone Year 4	Implement ERP
Milestone Year 5	Implement ERP
MEASURABLE GOALS AND MILESTONES	
BMP 2C	
Goal(s)	Develop policies and procedures for screening, tracking and identifying sources of illicit discharges, including the identification of hotspot landuses. The policies and procedures must also address coordination with emergency response agencies, such as TN Emergency Management Agency and local emergency management agencies for spills and hazardous materials cleanup, when appropriate.
Milestone Year 1	
Milestone Year 2	Within 18 mos of permit coverage: <ul style="list-style-type: none"> - Policies and procedures developed - Staff performing screening trained on policies and procedures
Milestone Year 3	
Milestone Year 4	
Milestone Year 5	
MEASURABLE GOALS AND MILESTONES	
BMP 2D	
Goal(s)	Maintain storm sewer system map for the campus
Milestone Year 1	Outfall map updated as new outfalls are identified
Milestone Year 2	Outfall map updated as new outfalls are identified
Milestone Year 3	Outfall map updated as new outfalls are identified
Milestone Year 4	Outfall map updated as new outfalls are identified
Milestone Year 5	Outfall map updated as new outfalls are identified

BEST MANAGEMENT PRACTICES FOR CONSTRUCTION SITE RUNOFF PROGRAM

MEASURABLE GOALS AND MILESTONES	
BMP 3A	
Goal(s)	Modify contract language requiring contractors to implement stormwater pollution prevention plan (SWPPP) controls and obtain a Notice of Coverage (NOC) from TDEC

**Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)**

Milestone Year 1	
Milestone Year 2	Within 18 mos. of permit coverage: - Contracts modified to include the language above - All new projects disturbing 1 acre or more required to obtain coverage under the CGP as well as go through review/inspection
Milestone Year 3	All new projects disturbing 1 acre or more required to obtain coverage under the CGP as well as go through review/inspection
Milestone Year 4	All new projects disturbing 1 acre or more required to obtain coverage under the CGP as well as go through review/inspection
Milestone Year 5	All new projects disturbing 1 acre or more required to obtain coverage under the CGP as well as go through review/inspection

BMP 3B	MEASURABLE GOALS AND MILESTONES
Goal(s)	Develop and implement a SWPPP review process to determine the completeness and overall BMP effectiveness
Milestone Year 1	
Milestone Year 2	Within 18 mos of permit coverage: - Develop or modify the existing plans review process to include a thorough review of SWPPPs for all sites affecting 1 acre or more - Develop a plans review checklist to document plans review
Milestone Year 3	SWPPPs reviewed
Milestone Year 4	SWPPPs reviewed
Milestone Year 5	SWPPPs reviewed

BMP 3C	MEASURABLE GOALS AND MILESTONES
Goal(s)	Develop or reference technical guidance materials for design of SWPPPs that is at least as restrictive as the TN CGP.
Milestone Year 1	
Milestone Year 2	Within 18 mos of permit coverage, technical guidance developed/referenced
Milestone Year 3	
Milestone Year 4	
Milestone Year 5	

BMP 3D	MEASURABLE GOALS AND MILESTONES
Goal(s)	Develop and implement an inspection program to conduct inspections on construction projects disturbing one acre or more to evaluate construction site compliance. Develop a site inspection checklist to ensure that construction projects are complying with the requirements of the construction site runoff control program
Milestone Year 1	
Milestone Year 2	Within 18 mos of permit coverage, inspection report developed
Milestone Year 3	Inspection report completed for each inspection
Milestone Year 4	Inspection report completed for each inspection
Milestone Year 5	Inspection report completed for each inspection

BEST MANAGEMENT PRACTICES FOR PERMANENT (POST-CONSTRUCTION) STORMWATER MANAGEMENT PROGRAM	
BMP 4A	MEASURABLE GOALS AND MILESTONES
Goal(s)	Develop and implement a set of requirements to establish, protect and maintain a permanent water quality buffer along all waters of the state at sites disturbing one acre or more.
Milestone Year 1	
Milestone Year 2	
Milestone Year 3	
Milestone Year 4	Contract documents for new projects disturbing 1 acre or more modified

**Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)**

Milestone Year 5	Ongoing implementation
BMP 4B	MEASURABLE GOALS AND MILESTONES
Goal(s)	Modify contracts to require permanent stormwater management practices on projects that disturb 1 acre or more.
Milestone Year 1	
Milestone Year 2	
Milestone Year 3	
Milestone Year 4	Contract documents for new projects disturbing 1 acre or more modified
Milestone Year 5	Ongoing implementation.
BMP 4C	MEASURABLE GOALS AND MILESTONES
Goal(s)	Adopt technical guidance documents for use in the design of permanent stormwater management practices. The technical guidance will include the following design criteria: runoff reduction of the first 1 inch of runoff; 80% total suspended solids removal, and no net increase in runoff.
Milestone Year 1	
Milestone Year 2	
Milestone Year 3	
Milestone Year 4	Design guidance either created or referenced and included on TTU's stormwater website
Milestone Year 5	Website kept current.
BMP 4D	MEASURABLE GOALS AND MILESTONES
Goal(s)	Review new construction plans for sites that disturb one acre or more to ensure permanent stormwater management practices have been addressed.
Milestone Year 1	
Milestone Year 2	
Milestone Year 3	
Milestone Year 4	<ul style="list-style-type: none"> - Develop or modify the existing plans review process to include a thorough review of development plans for permanent stormwater management controls for all sites affecting 1 acre or more - Develop a plans review checklist to document plans review
Milestone Year 5	Ongoing plans review.

BEST MANAGEMENT PRACTICES FOR MUNICIPAL POLLUTION PREVENTION AND GOOD HOUSEKEEPING	
BMP 5A	MEASURABLE GOALS AND MILESTONES
Goal(s)	Review policies and procedures related to grounds maintenance activities. Identify policies and procedures that should be modified to decrease the potential for negatively impacting stormwater runoff from grounds maintenance activities
Milestone Year 1	
Milestone Year 2	Listing of practices evaluated
Milestone Year 3	
Milestone Year 4	
Milestone Year 5	
BMP 5B	MEASURABLE GOALS AND MILESTONES
Goal(s)	Revise policies and procedures identified in A above and develop written policies to be used in staff training.
Milestone Year 1	
Milestone Year 2	<ul style="list-style-type: none"> - Develop written policies for practices that need to be revised - Develop written policies for practices where none exists
Milestone Year 3	

**Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)**

Milestone Year 4	
Milestone Year 5	
BMP 5C	MEASURABLE GOALS AND MILESTONES
Goal(s)	Include training on the revised policies and procedures during quarterly training by supervisors
Milestone Year 1	
Milestone Year 2	Training on revised policies and procedures.
Milestone Year 3	Ongoing quarterly training.
Milestone Year 4	Ongoing quarterly training.
Milestone Year 5	Ongoing quarterly training.
BMP 5D	MEASURABLE GOALS AND MILESTONES
Goal(s)	Evaluate practices at the garage to determine if additional controls or practices are needed to minimize the potential for negatively impacting stormwater quality
Milestone Year 1	
Milestone Year 2	<ul style="list-style-type: none"> - Listing of practices evaluated and findings - New policies developed, where necessary - Staff trained on new policies
Milestone Year 3	Ongoing annual staff training
Milestone Year 4	Ongoing annual staff training
Milestone Year 5	Ongoing annual staff training