



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

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

1. MS4 Information

Name of MS4: City of Portland	MS4 Permit Number: TNS088358	
Contact Person: Carlton Cobb	Email Address: ccobb@cityofportlandtn.gov	
Telephone: (615) 323-9293	MS4 Program Web Address: Stormwater Management – City of Portland, Tennessee (cityofportlandtn.gov)	
Mailing Address: 100 S Russell St		
City: Portland	State: TN	ZIP code: 37148

What is the current population of your MS4? 13,000

What is the reporting period for this annual report? July 1 2020 to June 30 2021

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

A. Does your MS4 discharge into waters with unavailable parameters (previously referred to as impaired) for pathogens, nutrients, siltation or other parameters related to stormwater runoff from urbanized areas as listed on TN's most current 303(d) list and/or according to the on-line state GIS mapping tool ([deconline.tn.gov/dwr/](http://deconline.tn.gov/dwr/))? If yes, attach a list.  Yes  No

B. Are there established and approved TMDLs (<http://www.tn.gov/environment/article/wr-ws-tennessees-total-maximum-daily-load-tmdl-program>) with waste load allocations for MS4 discharges in your jurisdiction? If yes, attach a list.  Yes  No

C. Does your MS4 discharge to any Exceptional Tennessee Waters (ETWs - [http://environment-online.tn.gov:8080/pls/enf\\_reports/f?p=9034:34304:4880790061142](http://environment-online.tn.gov:8080/pls/enf_reports/f?p=9034:34304:4880790061142))? If yes, attach a list.  Yes  No

D. Are you implementing specific Best Management Practices (BMPs) to control pollutant discharges to waterbodies with unavailable parameters or ETWs? If yes, describe the specific practices: The City conducts pre-construction meetings before all projects in the city limits begin. The City inspects and monitors active construction sites no less than once per month. The City works directly with the wastewater pre-treatment coordinator to identify illicit discharges. The City informs citizens about stormwater managemnet practices through educational pamphlets distributed at City organized festivals.  Yes  No

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

A. Have you developed a Public Information and Education plan (PIE)?  Yes  No

B. Is your public education program targeting specific pollutants and sources, such as Hot Spots? If yes, describe the specific pollutants and/or sources targeted by your public education program: The City distributes pamphlets and coloring books to citizens that identify lawn clippings, fertilizers, pet waste and household trash as the most common pollutants to our stormwater system. The educational materials are targeted for all ages, and inform the citizens how to avoid creating stormwater pollutants.  Yes  No

C. Do you have a webpage dedicated to your stormwater program? If yes, provide a link/URL: <https://cityofportlandtn.gov/departments/public-works/stormwater-management/>  Yes  No

D. Summarize how you advertise and publicize your public education, outreach, involvement and participation opportunities: The City advertises and publicizes through various methods, such as: stormwater website, live-streamed council meetings, utility bill inserts, vehicle door signs, and project signs where the Stormwater maintenance crew is performing work. We also encourage our entire stormwater department to have conversations with citizens when they are working in the City to help educate our citizens. The stormwater department has the slogan "Only Rain Goes Down the Drain" displayed on vehicles and equipment.

E. Summarize the public education, outreach, involvement and participation activities you completed during this reporting period: Due to the Covid-19 pandemic, we were not able to get out in the community as much as planned. Restrictions on visitors in schools and other places prevented the department from some outreach and educational activities. However, Portland's annual Strawberry Festival continued this year after cancelling in 2020. The stormwater department sets up a booth at the festival in order to meet citizens and have conversations about the importance of stormwater management. The City has created an educational coloring book and water bottles with the City of Portland logo that were dispersed at the festival. Over 300 of each were given out this year at our annual Strawberry Festival which attracts thousands of people to the City. The Strawberry Festival booth is a great way to interact with the public and educate our citizens about stormwater. Coloring books and water bottles are also given out at various times throughout the year. Portland also has a very detailed website for people to learn about stormwater management.

F. Summarize any specific successful outcome(s) (e.g., citizen involvement, pollutant reduction, water quality improvement, etc.) fully or partially attributable to your public education and participation program during this reporting period: The City of Portland has a very effective stormwater maintenance crew who helps not only improve the city's drainage issues, but is a great tool for citizen involvement. The stormwater crew helps improve water quality by clearing debris and sediment from ditches, replacing faulty drainage systems, and identifying and removing pollutants from our waterways. The crew is able to communicate with the public when they are on jobsites about the importance of proper water quality procedures and actions. The crew also aids the regulatory side by communicating with contractors in their efforts to maintain construction sites and stay in compliance with the City's stormwater ordinance. The department is beginning to receive more calls and complaints on a yearly basis from citizens about various stormwater issues as the program continues to grow. The more issues we know citizens are having, the better we can improve the overall water quality of the City.

4. Illicit Discharge Detection and Elimination (Section 4.2.3)

A. Have you developed and do you continue to update a storm sewer system map that shows the location of system outfalls where the municipal storm sewer system discharges into waters of the state or conveyances owned or operated by another MS4?  Yes  No

B. If yes, does the map include inputs into the storm sewer collection system, such as the inlets, catch basins, drop structures or other defined contributing points to the sewershed of that outfall, and general direction of stormwater flow?  Yes  No

C. How many outfalls have you identified in your storm sewer system? 32 Mapped Outfalls along four (4) streams

D. Do you have an ordinance, or other regulatory mechanism, that prohibits non-stormwater discharges into your storm sewer system?  Yes  No

E. Have you implemented a plan to detect, identify and eliminate non-stormwater discharges, including illegal disposal, throughout the storm sewer system? If yes, provide a summary: The City conducts training for all employees to identify illicit discharge. Suspected illicit discharges are reported to the stormwater department, and are investigated by the stormwater technician and stormwater supervisor. Results are reported to the public works director, and corrective actions are implemented. We also encourage the public to report any suspected illicit discharges to the department.  Yes  No

F. How many illicit discharge related complaints were received this reporting period? 18

G. How many illicit discharge investigations were performed this reporting period? 18

H. Of those investigations performed, how many resulted in valid illicit discharges that were addressed and/or eliminated? 9

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

A. Do you have an ordinance or other regulatory mechanism requiring:

Construction site operators to implement appropriate erosion prevention and sediment control BMPs consistent with those described in the TDEC EPSC Handbook?  Yes  No

Construction site operators to control wastes such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste?  Yes  No

Design storm and special conditions for unavailable parameters waters or Exceptional Tennessee Waters consistent with those of the current Tennessee Construction General Permit (TNR100000)?  Yes  No

B. Do you have specific procedures for construction site plan (including erosion prevention and sediment BMPs) review and approval?  Yes  No

C. Do you have sanctions to enforce compliance?  Yes  No

D. Do you hold pre-construction meetings with operators of priority construction activities and inspect priority construction sites at least monthly?  Yes  No

E. How many construction sites disturbing at least one acre or greater were active in your jurisdiction this reporting period? 9

F. How many active priority and non-priority construction sites were inspected this reporting period? 68

G. How many construction related complaints were received this reporting period? 18

6. Permanent Stormwater Management at New Development and Redevelopment Projects (Section 4.2.5)

A. Do you have a regulatory mechanism (e.g. ordinance) requiring permanent stormwater pollutant removal for development and redevelopment projects? If no, have you submitted an Implementation Plan to the Division?  Yes  No  
 Yes  No

B. Do you have an ordinance or other regulatory mechanism requiring:

Site plan review and approval of new and re-development projects?  Yes  No

A process to ensure stormwater control measures (SCMs) are properly installed and maintained?  Yes  No

Permanent water quality riparian buffers? If yes, specify requirements: The City's Stormwater ordinance section 21-106 (2) (c) specifies all permanent riparian buffer requirements. Buffers shall be clearly marked on site development plans, land disturbance permits, and or concept plans. Buffer width depends on the size of the drainage area. Buffer areas can be 30 ft. - 60 ft. depending on if the receiving water is impaired.

Yes  No

C. What is the threshold for development and redevelopment project plans plan review (e.g., all projects, projects disturbing greater than one acre, etc.)? The city engineer determines that the Stormwater discharge will contribute to, or is likely to contribute to a violation of a state water quality standard or if any development disturbs more than one acre.

D. How many development and redevelopment project plans were reviewed for this reporting period? 57

E. How many development and redevelopment project plans were approved? 46

F. How many permanent stormwater related complaints were received this reporting period? 5

G. How many enforcement actions were taken to address improper installation or maintenance? 5

H. Do you have a system to inventory and track the status of all public and private SCMs installed on development and redevelopment projects?  Yes  No

I. Does your program include an off-site stormwater mitigation or payment into public stormwater fund? If yes, specify. N/A  Yes  No

7. Stormwater Management for Municipal Operations (Section 4.2.6)

A. As applicable, have stormwater related operation and maintenance plans that include information related to maintenance activities, schedules and the proper disposal of waste from structural and non-structural stormwater controls been developed and implemented at the following municipal operations:

Streets, roads, highways?  Yes  No

Municipal parking lots?  Yes  No

Maintenance and storage yards?  Yes  No

Fleet or maintenance shops with outdoor storage areas?  Yes  No

Salt and storage locations?  Yes  No

Snow disposal areas?  Yes  No

Waste disposal, storage, and transfer stations?  Yes  No

B. Do you have a training program for employees responsible for municipal operations at facilities within the jurisdiction that handle, generate and/or store materials which constitute a potential pollutant of concern for MS4s?  Yes  No

If yes, are new applicable employees trained within six months, and existing applicable employees trained and/or retrained within the permit term?  Yes  No

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

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

Modifications or replacement of an ineffective activity/control measure. The department has added a stormwater technician role in order to assist in various areas of the department. The technician is responsible for all inspections on active construction sites in the City, and issuance of Land Disturbance Permits for new construction. This role also helps with identification of illicit discharges, and investigation of citizen stormwater related complaints.

Changes to the program as required by the division to satisfy permit requirements. N/A

Information (e.g. additional acreage, outfalls, BMPs) on newly annexed areas and any resulting updates to your program. N/A

B. In preparation for this annual report, have you performed an overall assessment of your stormwater management program effectiveness? If yes, summarize the assessment results, and any modifications and improvements scheduled to be implemented in the next reporting period. The City of Portland's stormwater management program has worked very effectively since its inception. We have been able to assist the public in correcting drainage issues, informing our citizens about stormwater and why it is important to our community, and maintain compliance with the state regulations through new construction projects. There are always improvements that can be implemented to better manage stormwater in the City of Portland. The stormwater crew will continue to grow as more drainage issues are brought to our attention, and as money allows for new equipment and more employees. We plan to continue annual training for all city employees on BMPs for the City and illicit discharge identification. Our employees are in the community on a daily basis, and we believe they can be an asset for our department. The department also plans to evaluate our good housekeeping mechanisms for all City owned buildings and properties. We plan to have regularly scheduled meetings with all department heads to inspect stormwater structures and BMPs as they are relative to their department. We can use these inspections as a public outreach tool to show our citizens how to properly inspect stormwater structures. We plan to expand our public education to as many schools in Portland that will allow visitors. In previous years, we have attended career fairs and STEM days to teach school-aged children about stormwater. We want to develop a small curriculum that can be adjusted from elementary to high school, and used throughout the year when it is fitting to what is being taught. We have already began reaching out to schools and getting ideas about how to proceed with this education and outreach tool.

Yes

No

9. Enforcement Response Plan (Section 4.5)

A. Have you implemented an enforcement response plan that includes progressive enforcement actions to address non-compliance, and allows the maximum penalties specified in TCA 68-221-1106? If no, explain. N/A  Yes  No

B. As applicable, identify which of the following types of enforcement actions (or their equivalent) were used during this reporting period; indicate the number of actions, the minimum measure (e.g., construction, illicit discharge, permanent stormwater management), and note those for which you do not have authority:

Action	<u>Construction</u>	<u>Permanent Stormwater</u>	<u>Illicit Discharge</u>	In Your ERP?	
Verbal warnings	#28	#1	#10	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Written notices	#5	#1	#5	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Citations with administrative penalties	#4	#1	#5	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Stop work orders	#0	#0	#0	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Withholding of plan approvals or other authorizations	#0	#0	#0	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Additional Measures	#0	#0	#0	Describe: <u>N/A</u>	

C. Do you track instances of non-compliance and related enforcement documentation?  Yes  No

D. What were the most common types of non-compliance instances documented during this reporting period? The most common types of non-compliance during this reporting period was failing or inadequate EPSC measures. We also notice a lack of twice-weekly inspections performed by a Level 1 inspector on construction sites. The sites that did have inspections were often inaccurate and did not provide a complete inspection of the jobsite. City staff would find numerous deficiencies on the site compared to nothing listed on inspection sheets. The City has seen an increase in illicit discharge during this reporting period. This could be due to a number of things, however, we believe the most common cause is the employee shortage many businesses and companies are experiencing. We have continued to stress the importance of proper employee training to businesses within the City. Every illicit discharge complaint is thoroughly investigated, and corrective actions are immediately implemented.

10. Monitoring, Recordkeeping and reporting (Section 5)

A. Summarize any analytical monitoring activities (e.g., planning, collection, evaluation of results) performed during this reporting period. No analytical monitoring activities have taken place during this reporting period.

B. Summarize any non-analytical monitoring activities (e.g., planning, collection, evaluation of results) performed during this reporting period. None - This monitoring was conducted during the 2018-2019 reporting period.

C. If applicable, are monitoring records for activities performed during this reporting period submitted with this report.  Yes  No

11. Certification

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

This report must be signed by a ranking elected official or by a duly authorized representative of that person. See signatory requirements in sub-part 6.7.2 of the permit.

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

Carlton Cobb Public Works  
Director  
Printed Name and Title

  
Signature

9/29/2021

Date

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

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



Waters with Unavailable Parameters or Exceptional Tennessee Waters						
Waterbody ID	Impacted Waterbody	County	Miles/Acres Impaired	CAUSE / TMDL Priority	Pollutant Source	COMMENTS
TN05130206024_0150	SUMMERS BRANCH	Robertson Sumner	12.6	Nitrate+Nitrite L Total Phosphorus L Loss of biological integrity due to siltation L Escherichia coli NA	Municipal Point Source Collection System Failure Pasture Grazing	Category 5. (One or more uses impaired.) TMDLs needed. EPA approved a pathogen TMDL that addresses some of the known pollutants on 3/28/08. Impacts include Portland STP.
TN05110002008_0550	UNNAMED TRIB TO WEST FORK DRAKES CREEK	Sumner	2.7	Flow Alterations NA	Upstream Impoundment	Category 4c. (Impairment not caused by a pollutant.) Randomly selected for Impounded Streams Survey.
TN05130206024_0152	DONAHO BRANCH	Sumner	3	Nitrate+Nitrite L Total Phosphorus L Physical Substrate Habitat Alterations L Escherichia coli NA	Collection System Failure Urbanized High Density Area Channelization	Category 5. (One or more uses impaired.) TMDLs needed. EPA approved a pathogen TMDL that addresses some of the known pollutants on 10/23/07.

