



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 Lakeland		MS4 Permit Number: TNS077526
Contact Person: Alejandra Arriaga		Email Address: aarriaga@lakelandtn.org
Telephone: (901) 317-6025		MS4 Program Web Address: www.lakelandtn.gov
Mailing Address: 10001 US Hwy 70		
City: Lakeland	State: TN	ZIP code: 38002

What is the current population of your MS4? 12,600

What is the reporting period for this annual report? July 1 2018 to June 30 2019

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

- A. Does your MS4 discharge into waters with unavailable parameters (previously referred to as impaired) for pathogens, nutrients, siltation or other parameters related to stormwater runoff from urbanized areas as listed on TN's most current 303(d) list and/or according to the on-line state GIS mapping tool (tdeconline.tn.gov/dwr/)? 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/pis/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: _____. 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: Through the City of Lakeland's educational program, residential type pollutants such as E.coli, pathogens, and toxins are addressed through educational brochures and events. At community events, City Staff distribute pens, brochures, reusable bags, recycling list magnets in order to educate and encourage recycling. Contractors are also given brochures on construction related pollutants by the City. The brochures educate contractors on best management practices. City Staff receive annual training on stormwater management with an emphasis on toxins, spill prevention, and clean up. Yes No

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- C. Do you have a webpage dedicated to your stormwater program? If yes, provide a link/URL: www.lakelandtn.gov Yes No
- D. Summarize how you advertise and publicize your public education, outreach, involvement and participation opportunities: The City of Lakeland advertises and publicizes on the City's website, Facebook, Twitter, Signage, Lakeland Currents, Homeowner's Associations, email, and City's Cable Channel 19.
- E. Summarize the public education, outreach, involvement and participation activities you completed during this reporting period: City staff attend community events such as LAMP concerts and Family Expo. During these events, educational brochures on pet waste and best practices for homeowners are distributed by City Staff. City Staff also distribute reusable bags, pet waste bags, recycled pencils, pens, fans, and frisbees. The City of Lakeland also held two community clean-up events where residents were able to dispose household trash, yard waste, e-waste, construction debris, and white goods.
- 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: _____

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? 113
- 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: During dry weather months, annual inspections on stormwater inlets and outlets are conducted in order to detect any illicit discharges. If an illicit discharge is detected, further inspection will be conducted in order to identify the source. Yes No
- F. How many illicit discharge related complaints were received this reporting period? 5
- G. How many illicit discharge investigations were performed this reporting period? 5
- H. Of those investigations performed, how many resulted in valid illicit discharges that were addressed and/or eliminated? 5

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

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- 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? 7
- F. How many active priority and non-priority construction sites were inspected this reporting period? 131
- G. How many construction related complaints were received this reporting period? 52
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 minimum buffer is 50 feet with an additional requirement depending on stream order, size of drainage basin, percent slope, floodway, and wetlands or critical area considerations. 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.)? All projects
- D. How many development and redevelopment project plans were reviewed for this reporting period? 7
- E. How many development and redevelopment project plans were approved? 3
- F. How many permanent stormwater related complaints were received this reporting period? 0
- G. How many enforcement actions were taken to address improper installation or maintenance? 0
- H. Do you have a system to inventory and track the status of all public and private SCMs installed on development and redevelopment projects? Yes No
- I. Does your program include an off-site stormwater mitigation or payment into public stormwater fund? If yes, specify. _____ Yes No
7. Stormwater Management for Municipal Operations (Section 4.2.6)
- A. As applicable, have stormwater related operation and maintenance plans that include information related to maintenance activities, schedules and the proper disposal of waste from structural and non-structural stormwater controls been developed and implemented at the following municipal operations:
- Streets, roads, highways? Yes No

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- 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. N/A
 - 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. In accordance with our monitoring plan, E.coli and Phosphorus have been monitored at Clear Creek monthly since January 2019. January-May results were not recorded, however the City of Lakeland will continue sampling to collect 12 months of sequential data. Results will be used to identify the source of contaminants in the stream and implement BMPs to reduce or eliminate the pollutant. To date, results have not exceeded the Water Quality Criteria for Recreation. Yes No

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9. Enforcement Response Plan (Section 4.5)

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

<u>Action</u>	<u>Construction</u>	<u>Permanent Stormwater</u>	<u>Illicit Discharge</u>	<u>In Your ERP?</u>	
Verbal warnings	#54	# _____	# _____	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Written notices	#43	# _____	#4	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Citations with administrative penalties	#8	# _____	# _____	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Stop work orders	#7	# _____	# _____	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Withholding of plan approvals or other authorizations	# _____	# _____	# _____	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Additional Measures	# _____	# _____	# _____	Describe: _____	

- 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?
Maintenance of EPSC, sediment runoff

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. City of Lakeland has monitored for E.coli and phosphorus during this reporting period. Data from Oct 2018-May 2019 was lost but the City will continue to monitor Clear Creek for a complete year in order to obtain a full year's of monitoring date.
- B. Summarize any non-analytical monitoring activities (e.g., planning, collection, evaluation of results) performed during this reporting period. If a discharge from Lakeland has been identified as a source of impairment, the City will conduct a visual stream survey and impairment inventory on streams impaired for siltation, habitat alteration and pathogens in order to indentify and prioritize stream impairment sources.
- C. If applicable, are monitoring records for activities performed during this reporting period submitted with this report. Yes No

11. Certification

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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."

MIKE CUNNINGHAM
Printed Name and Title


Signature

9/11/19
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

Attachment #1: List of Streams with Unavailable Parameters

WATERBODY ID	CAUSE/TMDL PRIORITY	MS4 ASSIGNED TO WLA	APPROVED TMDL
TN08010209002-0200 Rocky Branch Creek	E-Coli	YES	YES
TN08010209002-0300 Scotts Creek	Flow Alteration	NO	NO
TN08010209002-0400 Oliver Creek	Total Phosphorus Siltation E-Coli	YES	YES
TN08010203002-2000 Loosahatchie River	Total Phosphorus Habitat Alteration Siltation E-Coli	YES	YES
TN08010209003-0200 Cypress Creek	Total Phosphorus Habitat Alteration Siltation E-Coli	NO	YES
TN08010209003-0220 Unnamed Tributary to Cypress Creek	Habitat Alteration	NO	NO
TN08010209003-1000 Clear Creek	Total Phosphorus Habitat Alteration Siltation E-Coli	NO	YES
TN08010210023-1000 Fletcher Creek	Low DO Total Phosphorus Habitat Alteration E-Coli	YES	YES
TN08010209021 – 0600 Crooked Creek Canal	Total Phosphorus Low DO Habitat Alteration E-Coli	NO	YES

Public Education, Outreach, Involvement, and Participation Activities 2018- 2019

Date	Event	Description
7/18/2018	LAMP Concert	50 reusable bags, 50 pet waste bags, 35 frisbees, 50 pet waste brochures, 50 Recycling brochures, 25 fans, 50 Homeowner Guides to Cleaner Water, 50 Construction Guide to Cleaner Water
9/18/2018	LAMP Concert	50 reusable bags, 50 pet waste bags, 35 frisbees, 50 pet waste brochures, 50 recycling brochures, 25 fans, 50 recycled pencils
6/22/2019	LAMP Concert	30 frisbees, 50 reusable bags, 50 recycle list magnets, 60 recycling brochures, 60 fans
11/3/2018	Fall Community Clean-Up Event	Total collection: Trash 12,616 lbs., Metal 5,440 lbs, E-Waste 2,666 lbs., Tires 40,
4/27/2019	Spring Community Clean-Up Event	Total collection: Trash 24,300 lbs., Metal 2,340 lbs.,E-waste 3,064 lbs., Tires 81, Yard waste 4,050 lbs., White goods 56,700 lbs.
On-going	New Resident Packets	Lakeland Chamber of Commerce provides new residents various brochures on stormwater topics, pencils, recycle list magnets, and recycled pens
On-going	N Association of Broadcasters	Radio ads on Stormwater related topics
On-going	Adopt-A-Street-Program	8 sponsors pick up litter quarterly along their adopted section of roadway
On-going	Construction Permits	Construction Best Management Practice brochures included with new permits involving land disturbance