Illicit Discharge Detection and Elimination

Revision Date 8/7/2020

Illicit discharge detection and elimination is an important part of a stormwater program because it is necessary detect and eliminate pollutants entering the local water ways.

- ✓ An illicit discharge is defined as any discharge to an MS4 that is not composed entirely of stormwater (with a few exceptions as noted within the City's stormwater ordinance).
- ✓ Discharges are considered illicit when the MS4 is not designed properly to accept, process, or discharge such non-stormwater wastes.
- ✓ Illicit discharges are polluted runoff from construction sites, pipes carrying untreated liquid and debris which empty into a water body, cracked sanitary systems, spills, improper disposal of waste and/or effluent from septic tanks.
- ✓ An illicit discharge program involves mapping the storm sewer system, collecting data on outfalls and stream assessments, construction inspection, hot spot identification, inspection and enforcement, illegal dumping, a tracking system, and a hotline.

Illicit Discharge Detection and Elimination

Stream Monitoring Stream monitoring is an important component within the stormwater program. Continual monitoring is conducted by TDEC and/or Metro with sporadic monitoring by the City upon the request of TDEC.

A TMDL (Total Maximum Daily Load) has been written by TDEC for Mansker's Creek, Slater's Creek, and Lumsley Fork for stream segments within the City's jurisdiction that are impaired with e. coli. Refer to the TMDL manual guide to review TDEC's TMDL, the State's monitoring protocol, and the City's written response to the TMDL. *The City provides Analytical and Non-Analytical data to TDEC as required in permit.*

TDEC Requirements through the Stormwater Permit

4.2.3 Illicit Discharge Detection and Elimination

Permittees shall develop, or modify as necessary, implement and enforce an illicit discharge detection and elimination program. Newly designated permittees shall have this program implemented within 18 months of coverage under this permit. Currently permitted MS4s shall continue to implement their existing illicit discharge detection and elimination program. New permittees must develop, and existing permittees must continue to develop, update and maintain, a storm sewer system map (preferably Geographic Information System based) that shows the location of system outfalls where the municipal storm sewer system discharges into waters of the state or storm sewer systems owned or operated by another MS4 jurisdiction. Updates to the map should be completed within 6 months of the completion of a system modification or addition. The deadline may be extended for larger changes such as large annexations. The map must be available for review upon request. The map must also show: a. the names and location of waters of the state that receive discharges from those outfalls; b. inputs into the storm sewer collection system, such as the inlets, catch basins, drop structures or other defined contributing points to the sewer shed of that outfall; and c. general direction of stormwater flow. To the extent allowable under state or local law, permittees shall effectively prohibit, through ordinance, or other regulatory mechanism, non-stormwater discharges (unless allowed by sub-section 1.3.3.2) into the storm sewer system and implement an appropriate Enforcement Response Plan (ERP). The illicit discharge ordinance and the ERP must be developed and in effect within 18 months of coverage under this permit. Permittees must develop and implement a plan to detect, identify and eliminate non-stormwater discharges, including illegal disposal, throughout the MS4 jurisdiction.

This plan must also include the identification of hot spots. The permittee shall develop and implement standard procedures to be followed to investigate portions of the MS4 jurisdiction that, based on the results of field screening or other identification programs, indicate a reasonable potential of containing illicit discharges. Illicit discharge investigations, and the results of those investigations, shall be documented and include the locations, times, parameters and sampling results, discharge source, and any other pertinent information. The plan to eliminate identified illicit discharges should be completed within 90 days of the initial report, and the discharge eliminated as soon as practicable. All plans and procedures in the IDDE program must be documented in the SWMP.

Procedure Introduction

As part of the mission of academic excellence through research and community engagement, the WKU Department of Public Health, Environmental Health Science Program proposes to assist the City of Goodlettsville, Tennessee in a project to conduct watershed health assessments. This project will be conducted in compliance with standards set forth by of the Tennessee Department of Environment and Conservation (TDEC) and the Environmental Protection Agency for Small Municipal Separate Storm Sewer Systems (MS4s) during a permit cycle (TDEC, 2010).

The purpose of this study is to assess the health of the watersheds within the City of Goodlettsville's MS4. This assessment will be composed of objectives that meet the requirements of the City's Phase II MS4 permit. Objectives of this study include the following:

- *Non-analytical monitoring to include visual stream surveys and impairment inventories, which includes evaluating the physical attributes of the stream corridors, within the City of Goodlettsville's MS4. Surveys will include assessments immediately upstream and downstream from discharges from the MS4. Visual stream surveys will be conducted on the approximately 12 miles of streams within the MS4, to include Mansker Creek, Lumsley Fork, Madison Creek, and Dry Creek. Slaters Creek will not be included in the visual assessment as it is outside of the City's MS4.*

- *Submission of all completed forms and data collected to the City of Goodlettsville, TN.*

WKU will provide a Principal Investigator, Dr. Ritchie Taylor, to oversee and manage the project. Graduate Research Assistants, under direction of Dr. Taylor, will ensure the field and lab operations follow specific TDEC and applicable protocols. Graduate Research Assistants will conduct the day-to-day field operations, with assistance from other graduate or undergraduate students. All components of the study will be reviewed and directed by Dr. Taylor.

Methods

Components of this study will follow specified TDEC methods. Methods for non-analytical monitoring are specified in the general National Pollutant

Discharge Elimination System (NPDES) permit requirements for Small MS4s in Tennessee.

Non-Analytical Monitoring

In order to meet the general NPDES permit requirements for small MS4s in Tennessee, non-analytical monitoring is prescribed where discharges from the MS4 have been identified as the source of siltation, habitat alteration, and/or pathogen impairment. To meet this requirement, Visual Stream Surveys and Impairment Inventories must be performed.

- *At a minimum, a visual stream survey must be performed immediately upstream and downstream of each MS4 outfall that discharges into an impaired segment.*

- *The MS4 shall refer to existing protocols by the EPA, Natural Resources Conservation Service, and/or the Maryland Department Natural Resources.*

WKU will evaluate the stream assessment and outfall inventory procedures that were developed and used by the City of Goodlettsville in the past. In comparison to the protocols specified in the permit, WKU may develop modified assessment forms to better assess stream corridors and impairment. To accomplish this task, WKU will first conduct an assessment of the Manskers Creek stream corridor, including an outfall inventory, with the three procedures specified in the permit and with the City of Goodlettsville's visual assessment forms. Following this analysis, the team will compare the results, decide on the assessments that provide the most beneficial information to the City, and develop a modified assessment strategy, if deemed necessary. The intent of this first step is to determine the most efficient methodology for a small MS4 to evaluate habitat and impairment. Based on the findings for Manskers Creek, the same approach will be applied to all other stream segments, or the modified assessment strategy developed will be applied to all other segments.

The streams that are the subject of non-analytical monitoring in the City of Goodlettsville, TN, are Manskers Creek, Lumsley Fork, Madison Creek, and Dry Creek, for an estimated total of approximately 12 miles of streams. Slaters Creek is not included in the non-analytical monitoring as it is outside of the jurisdictional boundary of the City.

Following a modified version of the Maryland Department of Natural Resources' survey methods, a WKU Graduate Research Assistant, as supervised by an environmental health scientist and Dr. Taylor, will conduct the visual stream assessments. Stream segments will be surveyed at a rate of approximately 1.5-stream miles/day. These surveys

will take place during dry weather conditions, defined as at least 48 hours after the last runoff producing rain event. Due to the unpredictability of the dry weather requirement, provisions for flexibility in the work schedule have been budgeted.

NON-ANALYTICAL ASSESSMENT 2019

Visual Stream Assessment - Marryland Protocol - Fish Barriers						
	Lat Coord	**Long Coord**	**Barrier Type**	**Severity**	**Correctability**	**Access**
Slater						
3	36.34318	-86.71601	Natural falls	4	3	4
Lumsley Fork						
1	36.3319	-86.72953	Natural falls	4	2	2
2	36.3339	-86.72785	Natural falls	3	2	1
2	36	-86.72737	Natural falls	4	2	1
2	36.33432	-86.72684	Natural falls	4	2	1
2	36.33479	-86.72626	Natural falls	4	2	1
3	36.33635	-86.72282	Natural falls	4	2	1
3	36.3384	-86.72045	Natural falls	4	2	1
3	36.33946	-86.7`919	Pipe	3	4	3
Dry Creek						
1	36.29969	-86.73058	Natural falls	3	2	4
1	36.29978	-86.72997	Natural falls	4	2	4
1	36.29968	-86.72875	Natural falls	4	2	4
1	36.29959	-86.72824	Natural falls	3	2	4
1	36.29943	-86.72769	Natural falls	Stream Stoppage after this point - no flow.		

Hot Spot Locations

A hot spot is defined as an area where land use or activities generate highly contaminated runoff, with concentrations of pollutants in excess of those typically found in stormwater.

Determining Hot Spot Locations

The City of Goodlettsville defines the following as hot spot locations:

- Vehicle or fleet salvage facilities
- Vehicle or fleet recycling facilities
- Vehicle or fleet storage facilities
- Vehicle or fleet repair and/or maintenance facilities
- Vehicle or fleet towing facilities

Note: A SWPPP (stormwater pollution prevention plan) may be required under the EPA's NPDES stormwater program for any of the above-mentioned facilities.

Hot Spot Regulation

PROCEDURES FOR IMPLEMENTATION OF THE CITY OF GOODLETTSVILLE'S "HOT SPOT" STORM WATER POLLUTION PREVENTION PROGRAM

Purpose

To protect, maintain, and enhance the environment, public health, safety, and general welfare of the citizens of the City by controlling pollutant discharges to the City's storm water system and to maintain and improve the quality of receiving waters into which the storm water flows.

Definition

A hot spot ("priority area") means an area where land use or activities generate highly contaminated runoff, with concentrations of pollutants in excess of those typically found in stormwater.

Scope

This document identifies the types of establishments the City considers to be stormwater hot spots and sets forth the City's minimum guidelines (suggested Best Management Practices (BMPs) to diminish contamination of stormwater runoff.

Applicable Permits and Laws

Municipal Separate Storm Sewer System (MS4) General Permit Issued by the Tennessee Department of Environment and Conservation (TDEC)

The City is required by TDEC and the EPA to identify hot spot ("priority areas") within its jurisdiction and to help better manage stormwater runoff.

Public Education and Outreach, MS4 General Permit Section 4.2.1.1.1

For any types of activities, you know to be stormwater pollutant hot spots in your area, you must prepare a clear set of requirements with respect to stormwater management at these establishments and ensure that the establishments have been made aware of those requirements.

Illicit Discharge Detection and Elimination, MS4 General Permit Section 4.2.3.2

You must be able, by ordinance or other regulatory mechanism, to prohibit contamination of stormwater runoff from hot spots.

Tennessee Code Annotated §68-221-1105

TCA§68-221-1105 provides that, among other power municipalities have with respect to stormwater facilities, is the power by ordinance or resolution to:

> Exercise general regulation over the operation and maintenance of stormwater facilities in the municipality;
>
> Adopt rules and regulations deemed necessary to accomplish the purposes of this statute;
>
> Establish standards to regulate the quantity of stormwater discharged and to regulate stormwater contaminants as may be necessary to protect water quality;
>
> Review and approve plans and plats for stormwater management;
>
> Issue permits for storm water discharges;

Suspend or revoke permits when it is determined that the permittee has violated any applicable ordinance, resolution, or condition of the permit;

Regulate and prohibit discharges into storm water facilities of sanitary, industrial, or commercial sewage or water that have otherwise been contaminated; and

Expend funds to remediate or mitigate the detrimental effects of contaminated land or other sources of storm water contamination.

City of Goodlettsville Storm Water Ordinance 04-651

In addition to the City's storm water ordinance and its prohibition of illicit discharges, the ordinance states in section 18-311 Illicit Discharges, item #6:

18-311 (6) Hot Spots ("Priority Areas").

The administrator is authorized to regulate hot spots ("priority areas"). Upon written notification by the administrator, the property owner or designated facility manager of a hot spot area shall, at their expense, implement necessary controls and/or best management practices to prevent discharge of contaminated storm water to the municipal separate storm sewer system. The administrator may require that the facility maintain inspection logs or other records to document compliance with this paragraph.

Implementation of City Ordinance for Defined Hot Spot Areas

The Stormwater Department shall identify hot spot areas and provide written notification of the City Ordinance regulating "Hot Spots" to the owner or facility manager.

The Stormwater Department will provide a list of appropriate BMP's for facilities to utilize and will make staff *(Public Works Inspector)* available to meet with owners and facility managers as needed to explain the BMP's.

When a facility has an illicit discharge of stormwater to the public storm water system, the administrator may initiate enforcement action as provided for in the stormwater ordinance.

Information on this program *is* available via the City's website.

Public education and outreach opportunities (e.g. meetings, development of informational materials, training sessions, etc.) will be provided as needed.

Hot Spot Control – City-Owned Facilities

The BMP's below will be provided to the property owner or facility manager of defined hot spot areas and will also be utilized by all City Departments to minimize the contamination of stormwater runoff from City-owned facilities. Each department shall designate *an employee*, who shall be responsible for implementation of the BMP's.

General Guidelines (Suggested Best Management Practices (BMPs)

Good Housekeeping BMPs

1. Never dispose of wash-water to storm drain or pavement; it must be disposed of to the sanitary sewer. Wash-water can be defined as any liquid with cleaner with residual dirt and grime. Examples include mop-water, window cleaning water, and rinse water (rinsing after a cleaner was used). Plain (no residual cleaner) rinse water may be used for irrigating plants. Always check with the sewer department supervisor prior to putting an unconventional waste into the sanitary sewer.
2. Promptly clean up any spill of liquid or solid wastes. Do not hose down an area to clean or handle a spill, unless the liquid will be completely contained, cleaned up and disposed of in sanitary sewer or offsite as appropriate for the waste type. Do not discharge to storm drains, landscaped areas or off-site. Wastes, salvaged materials and recyclables must be properly contained and disposed of.
3. Schedule regular cleaning of areas that collect debris to eliminate particulate and residue buildup. This applies to both exterior and interior areas. Keeping interior areas clean prevents the tracking of contaminants outdoors. Add trash containers, when appropriate, to minimize littering.
4. Evaluate safer alternative products for any job that usually uses toxic or hazardous products. For instance, investigate alternative floor and window cleaners (specialized cleaners), general cleaners, adhesives, paints, and lubricants. When available and cost effective, these products should be used.
5. Do not use drains without knowing whether they flow to the sanitary sewer, storm system or self-contained internal sump. Confirm before using drains to ensure proper disposal.
6. Store equipment and supplies under cover whenever possible. Minimizing contact with stormwater minimizes contaminants from getting into stormwater run-off. Use exterior grade cabinets or containers when exposed to the weather; interior grade

cabinets and containers will rust or deteriorate contributing contaminants to stormwater run-off.
7. Dispose solid waste in trash or recycling containers.
8. Have spill response equipment available near the storage of liquid or hazardous substances.
9. Leaking equipment should be equipped with drip-pans, appropriate clean-up materials, and have proper containment.

Storm Drains and Catch Basins BMPs

1. Inspect stormwater drains, grates, inlets, ditches, swales and catch basins on a regular basis.
2. Clean storm grates, inlets, drains, ditches, swales and catch basins to remove the accumulation of debris and sediment. Clean structures on a regular basis to keep debris from accumulating.
3. Promptly repair any damaged or deteriorating structure or any other problems that may compromise the integrity of the stormwater drainage system. Keep a log of stormwater system maintenance.
4. Update facility schematics with any change to the plumbing (to prevent cross connections) or stormwater drain system. Discharges allowed according to the City's stormwater ordinance are the only discharges allowed into the City's stormwater system.
5. Make sure that employees know that storm drains, catch basins and culverts are part of the stormwater collection system; not part of the sanitary sewer system.
6. If filters are used on storm drains, ensure proper installation and maintenance. Document cleaning and maintenance activities.

Solid Waste Management BMPs

1. Keep dumpsters, trashcans and recycling bins covered and properly contained, except when filling or emptying. Schedule pickup frequency to keep trash from holding the cover open. Open lids allow contact with stormwater, which dissolves and transports contaminants into the stormwater system.
2. Do not put liquids or greases in the trash containers. They should be discarded according to the Sewer Department's specifications.
3. Check that the dumpster or trashcan to ensure it is in good condition, with no holes or accumulation of grime. Trash containers should be leak-free.

4. Regularly inspect the trash enclosure and general area for problems such as trash not in the container and accumulation of grease or food on the ground. Clean the trash enclosure as needed to remove any accumulations of grime and/or general trash.
5. Designate an area for trash collection away from storm drains. This allows problems at the trash container to be corrected before reaching the storm drain or flow offsite.
6. Maintain all seals on solid waste collection vehicles to prevent dripping of contaminated material onto pavement and roadways.

- **Fueling BMPs**
    1. Discourage topping-off of fuel tanks to reduce accidental spillage. Post “no topping-off” signs at the fuel islands.
    2. Promptly clean up any spill of liquid or solid wastes. Do not hose down an area to clean or handle a spill, unless the liquid will be completely contained, cleaned up and disposed of appropriately for the waste type. Do not discharge any liquid to storm drains or offsite.
    3. Regularly inspect oil/water separator and sumps; maintain as needed.

Washing and Cleaning BMPs

Use designated wash areas to prevent wash water from entering the storm sewer system.

1. Use phosphate-free, biodegradable soaps, when possible.
2. Do not use solvents.
3. When cleaning vehicles/equipment:
    a. Use as little water as possible to avoid having to install erosion and sediment controls for the wash area. High pressure sprayers may use less water than a hose, and should be considered.
    b. Use positive shutoff valve to minimize water usage.
4. Clean leaks, drips, and other spills with as little water as possible. Use rags for small spills, a damp mop for general cleanup, and dry absorbent material for larger spills. Use the following three-step method for cleaning floors:
    a. Clean spills with rags or other absorbent materials.
    b. Sweep floor using dry absorbent material.
    c. Mop floor. Mop water may be discharged to the sanitary sewer via a toilet or sink.

5. Keep equipment clean; don't allow excessive build-up of oil and grease.
6. Keep drip pans or containers under the areas that might drip.
7. If possible, eliminate or reduce the amount of hazardous materials and waste by substituting non-hazardous or less hazardous materials.

Leak and Spill Control BMPs

1. Perform fluid removal and changes inside or under cover on paved surfaces.
2. Properly store hazardous materials and waste.
3. Have spill cleanup supplies readily available.
4. Use dry cleanup methods.
5. Periodically check vehicles for leaking fluids.

Maintenance BMPs

1. Perform maintenance using indoor facilities instead of outside whenever possible as to protect the stormwater runoff. If maintenance should be done outside, ensure correct procedures are followed where prevention practices for spills and leaks can be practiced if needed.
2. If an outdoor maintenance area is needed, it should be located on a paved concrete surface in order to facilitate cleanup. Use barriers to prevent stormwater runoff from entering the area.
3. Use a secondary containment such as a drain pan or drop cloth to catch spills or leaks. Keep a drip pan under the vehicle when removing hoses, filters, or other parts.
4. Have an ample supply of cleanup materials where they are readily accessible and properly stored.
5. Clean leaks and other spills with as little amount of water as possible. Use rags for small spills, a damp mop for general cleanup and dry absorbent materials for larger spills.
6. Provide spill containment dikes or secondary containment around stored oil and chemical drums.

Inspection or Recordkeeping BMPs

The property owner, or designated manager, will conduct facility inspections. Facility will maintain inspection logs to be reviewed by the Public Works Department Inspector.

Notification to Hot Spot-Defined Locations

City personnel utilized the EPA's *Hotspot Site Investigation Checklist* form to determine if a business was classified as a hot spot. A letter was sent to each business explaining their self-monitoring requirements along with a copy of a checklist the City created and a list of suggested BMPs (Best Management Practices).

Enforcement of Hot Spot Locations

Enforcement of hot spot locations fall under the Enforcement and Penalties sections of the current stormwater ordinance. Sections of the City's stormwater ordinance:

18-312. Administrative enforcement

1. **Notification of Violation** - Whenever the Administrator finds that any permitee or any other person discharging storm water has violated or is violating this article or a permit or order issued hereunder, the administrator may serve upon such person written notice of the violation. Within ten (10) days of the receipt date of this notice, an explanation of the violation and a plan for the satisfactory correction and prevention thereof, to include specific required actions, shall be submitted to the Administrator. Submission of this plan in no way relieves the discharger of liability for any violations occurring before or after receipt of the notice of violation.

2. **Consent Orders** - The Administrator is empowered to enter into consent orders, assurances of voluntary compliance, or other similar documents establishing an agreement with the person responsible for the noncompliance. Such orders will include specific action to be taken by the person to correct the noncompliance within a time period also specified by the order. Consent orders shall have the same force and effect as administrative orders issued pursuant to paragraphs (4) and (5) below.

3. **Show Cause Hearing** - The Administrator may order any person who violates this article or storm water permit or order issued hereunder, to show cause why a proposed enforcement action should not be taken. Notice shall be served on the person specifying the time and the place for the meeting, the proposed enforcement action and the reasons for such action, and a request that the violator show cause why this proposed enforcement action should not be taken. The notice of the meeting shall be served at least ten (10) days prior to the hearing.

4. **Compliance Order** - When the Administrator finds that any person has violated or continues to violate this article or a permit or order issued hereunder, he may issue an order to the violator directing that, following a specific time period, adequate structures, devices, be installed or procedures implemented and properly operated. Orders may also contain such other requirements as might be necessary and appropriate to address the noncompliance.

5. **Cease and Desist Orders** - When the Administrator finds that any person has violated or continues to violate this article or any permit or order issued hereunder, the administrator may issue an order to cease and desist all such violations and direct those persons in noncompliance to:

a. Comply forthwith; or

b. Take such appropriate remedial or preventive action as may be needed to properly address a continuing or threatened violation, including halting operations and terminating the discharge.

18-313. Penalties

1. **Violations** - Any person who shall commit any act declared unlawful under this article, who violates any provision of this article, who violates the provisions of any permit issued pursuant to this article, or who fails or refuses to comply with any lawful communication or notice to abate or take corrective action by the City of Goodlettsville, shall be guilty of a civil offense.

2. **Penalties** – Under the authority provided in Tennessee Code Annotated §68-221-1106, it is declared that any person violating the provisions of this article may be assessed a civil penalty by the City of Goodlettsville of not less than fifty dollars ($50.00) and not more than five thousand dollars ($5,000.00) per day for each day of violation. Each day of violation shall constitute a separate offense.

3. **Measuring civil penalties** – In assessing a civil penalty, the Administrator may consider:

The harm done to the public health or the environment;

Whether the civil penalty imposed will be a substantial economic deterrent to the illegal activity;

The economic benefit gained by the violator;

The effectiveness of action taken by the violator to cease the violation;

Any unusual or extraordinary enforcement costs incurred by the City of Goodlettsville;

Any equities of the situation which outweigh the benefit of imposing any penalty or damage assessment.

4. **Recovery of damages and costs** - In addition to the civil penalty in subsection (2) above, the City of Goodlettsville may recover:

a. All damages proximately caused by the violator to the municipality, which may include any reasonable expenses incurred in investigating violations of, and enforcing compliance with, this article, or any other actual damages caused by the violation.

b. The cost of the municipality's maintenance of storm water facilities when the owner of such facilities fails to maintain them as required by this article.

18-314. Appeals

Pursuant to Tennessee Code Annotated § 68-221-1106(d), any person aggrieved by the imposition of a civil penalty or damage assessment as provided by this article may appeal said penalty or damage assessment. Upon issuance of a citation or notice of violation of this article it shall be conclusive and final unless the accused violator submits a written notice of appeal to the Administrator within ten (10) days of the violation notice being served. If the Administrator does not issue a decision within ten (10)

days of the written notice of appeal, then the violation is considered upheld. If the Administrator does not reverse the decision, the aggrieved party may appeal to the City of Goodlettsville hearing authority or successor, by filing a written request for hearing within ten (10) days of the Administrator decision on the appeal. The request for hearing shall state the specific reasons why the decision of the Administrator is alleged to be in error.

18-315. City of Goodlettsville Hearing Authority

The City of Goodlettsville hearing authority is established under Title 18, chapter 2, section 18-207 of the Goodlettsville Municipal Code.

Hotline/Reporting IDDE Complaints

The City of Goodlettsville has a dedicated telephone number established to receive illicit discharge related complaints – *(615) 851-2200*. This number is answered during normal business hours and is also equipped with voice mail.

The City has established IDDE reporting capabilities on its website. There are required fields on this form and once completed, the reporter submits the form. This information is sent to the Stormwater Coordinator, via email.

Once a complaint has been received, it is *entered into the reports and tracking system of the* Stormwater Coordinator. Call Center will log all calls and complaints received and route the information to appropriate personnel via email notification.

Identification and Inspection of High-Priority Construction Sites

The City of Goodlettsville recognizes a permitted construction site that outfalls to a stream with *unavailable parameters, as a high-priority construction site*.

The City of Goodlettsville will inspect high-priority construction sites *twice* per *month*. *(All Construction sites will be considered high priority)*.

Illegal Dumping

Illegal dumping is either reported by citizen notification (via phone, City website, email, or personal visit to a City office) or by an employee who has noticed the problem. The complainant may also contact the Police Department upon witnessing a dumping event.

Depending on the item(s) wrongly disposed of, *Codes Department* will be notified to address the situation. If the items are not hazardous, a sanitation or streets and highway crew will be dispatched to remove items *(within right of way)* and properly dispose of them. *Private property owners will be notified of violation via*

letter. If hazardous materials are involved, the Fire Department *will be notified*. The Fire Department's phone number is *(615) 851-5111*.

Tracking System for IDDE

The City of Goodlettsville has a dedicated telephone number established to receive illicit discharge related complaints – *(615) 851-3462.* This number is answered during normal business hours and is equipped with voice mail for receipt of after-hours calls.

Illicit discharge reporting is available online. This information is submitted to the Stormwater Coordinator, via email.

IDDE issues are entered into Call Center as notification of calls and complaints received. Once entered, information is sent via email to the appropriate person(s).

Data collected:

- Name and/or address
- Choose topic
- Add notes and other attachments, if applicable
- Email to interested parties

Press the save button which tells the software program to assign a request number and saves the request as an attachment to an email. The request is then emailed to the appropriate staff personnel (Stormwater Coordinator, Sanitation Supervisor, Sewer Supervisor).

- Upon receipt of notification, the appropriate staff investigates the complaint and proceeds accordingly.
- Enforcement actions are outlined in the City of Goodlettsville's Stormwater Ordinance.

August 7, 2020

PRI Concrete
208 Connell Street
Goodlettsville, TN 37072

Dear PRI,

Water quality is important to all of us. As part of the City's storm water pollution prevention program, your facility has been designated as a priority area and, therefore, your assistance in preventing pollution of stormwater runoff is required to help improve stream water quality within the City of Goodlettsville. Priority areas, also known as "hot spots", are simply properties which, due to the nature of the business activity on the property, could contribute to pollution of storm water, if not properly maintained. This does not mean that the property is contributing to pollution of storm water, only that it has the potential to do so.

City regulations, specifically paragraph 18-311 (6) read, "The administrator is authorized to regulate hot spots ("priority areas"). Upon written notification by the administrator, the property owner or designated facility manager of a hot spot area shall, at their expense, implement necessary controls and/or best management practices to prevent discharge of contaminated storm water to the municipal separate storm sewer system. The administrator may require that the facility maintain inspection logs or other records to document compliance with this paragraph."

The City of Goodlettsville, in implementing this regulation, requires that you complete the enclosed site inspection form on a quarterly basis and return it to the City. The checklist must be submitted quarterly (Inspections are due March 30, June 30, September 30, and December 31)

Checklist as well as suggested best management practices (BMPs) are available online at:
http://www.goodlettsville.gov/997/Illicit-Discharge-Detection-and-Eliminat

Thank you in advance for compliance with this requirement. City staff is available to visit your business and answer questions or help with the checklist. For assistance please call the Public Works Inspector at 859-2740.

Sincerely,

Michael Walrond

City of Goodlettsville
Public Works Inspector
Michael Walrond
215 Cartwright St. Goodlettsville, Tn. 37072
615-851-2740

CITY OF GOODLETTSVILLE
PRIORITY AREA STORMWATER INSPECTION SHEET

BUSINESS NAME: _____ PRIMARY CONTACT NAME: _____

INSPECTOR: _____ ADDRESS: _____

INSPECTION DATE: _____ PHONE: _____

EMAIL ADDRESS: _____

GOOD HOUSEKEEPING	N/A	YES	NO	ACTION NEEDED
Do storm drain grates need to be cleaned or maintained?				
Are stormwater drainage paths clear of dirt and debris?				
Are outside areas neat and orderly?				
Are waste receptacles properly contained and covered?				
Are vehicles or equipment cleaned at this facility?				
Is wash water disposed of into the sanitary sewer system?				
If installed in facility, are filters on drains are cleaned/maintained on regular basis.				
Are spill response materials available on site?				
HAZMAT STORAGE	**N/A**	**YES**	**NO**	**ACTION NEEDED**
Are vehicles fueled at this location?				
Are fuel tanks operating properly?				
Do above-ground storage tanks have secondary containment?				
Are containment structures or surface slabs liquid tight?				
Are hazardous materials stored on site?				
Are containers weathertight, covered or properly contained and stored?				
OTHER BEST MANAGEMENT PRACTICES	**N/A**	**YES**	**NO**	**ACTION NEEDED**
Are waste materials kept on site in leak-tight containers?				
Is leaking equipment equipped with drip pans and proper clean-up supplies?				
Are wastes, salvaged materials and recyclables are properly contained?				

NOTES:

Inspections are due March 30, June 30, September 30, and December 31

Goodlettsville Public Works Department
Attention: Michael Walrond, Inspector
215 Cartwright Street
Goodlettsville, TN 37072

Email: mwalrond@goodlettsville.gov

Phone (615) 859-2740 Fax (615) 851-2212

Suggested Best Management Practices (BMPs)

Preface

The purpose of this Best Management Practices (BMP) Manual is to help educate and instruct on ways to reduce stormwater pollution and help prevent it in the future.

Selection of Best Management Practices

BMPs may be selected from the options listed below or developed on a case-by-case basis as appropriate.

Basic BMPs for Employees (Good Housekeeping)

Goal

Promote efficient and safe housekeeping practices which keep potential pollutants from either draining into or being transported offsite

Approach

10. Do not dispose wash-water to storm drain or pavement. It must be disposed of into the sanitary sewer. Wash-water can be defined as any liquid with cleaner with residual dirt and grime. Examples include mop-water, window cleaning water, and rinse water (rinsing after a cleaner was used). Plain (no residual cleaner) rinse water may be used for irrigating plants.
11. Promptly clean up any spill of liquid or solid wastes. Do not hose down an area to clean or handle a spill, unless the liquid will be completely contained, cleaned up and disposed of to sanitary sewer or offsite as appropriate for the waste type. Do not discharge to storm drains.

Wastes, salvaged materials and recyclables must be properly contained.

12. Schedule regular cleaning of areas that collect debris to eliminate particulate and residue buildup. This applies to both exterior and interior areas. Keeping interior areas clean prevents the tracking of contaminants outdoors. Add trash containers, when appropriate, to minimize littering.
13. Evaluate safer alternative products for any job that usually uses toxic or hazardous products. For instance, investigate alternative floor and window cleaners (specialized cleaners), general cleaners, adhesives, paints, and lubricants.
14. Use the proper drain to handle the disposal job. Do not use drains without knowing whether they flow to the sanitary sewer, storm system or self-contained internal sump.
15. Store equipment and supplies under cover whenever possible. Minimizing contact with storm water minimizes contaminants from getting into storm water run-off. Use exterior grade cabinets or containers when exposed to the weather; interior grade cabinets and containers will rust or deteriorate contributing contaminants to storm water run-off.
16. When washing vehicles, make sure there is a procedure protecting the waste water by containing and properly disposing of the wash water and debris or utilize a commercial car wash that drains into the sanitary sewer system.
17. Place trash in disposal or recycling containers.
18. Have spill response equipment available when using or storing liquid or hazardous substances.
19. Leaking equipment should be equipped with drip-pans, appropriate clean-up materials, and have proper containment.
20. Any complaints received regarding the stormwater system should be addressed as soon as possible and documented.

Storm Drains & Catch Basins

Goal

To prevent the discharge of soil, debris, hazardous waste, and other pollutants that may hinder the designed conveyance capacity or damage stormwater quality or habitat in the storm drain system.

Approach

7. Inspect storm water drains, grates, inlets, ditches, swales and catch basins on a regular basis. Keep a log of areas and structures inspected and maintained.

8. Clean storm grates, inlets, drains, ditches, swales and catch basins to remove the accumulation of debris and sediment. Keep a log of the material removed from each structure. Clean structures on a regular basis to keep debris from accumulating.
9. Promptly repair any damaged or deteriorating structure or any other problems that may compromise the integrity of the storm water drainage system. Keep a log of storm water system maintenance.
10. Update facility schematics with any change to the plumbing (to prevent cross connections) or storm water drain system. Discharges allowed according to the City's stormwater ordinance are the only discharges allowed into the City's storm water system.
11. Make sure employees know that storm drains, catch basins and culverts are part of the storm water collection system not part of the sanitary sewer system.
12. If filters are used on storm drains, ensure proper installation and maintenance. Document cleaning and maintenance activities.

Trash & Dumpster Management

Goal

Prevent or reduce the discharge of pollutants to stormwater system or natural streams using effective management of waste materials. Education and training, proper material use, source reduction, tracking waste generation and disposal, proper material storage, recycling, preventing stormwater contact and runoff from waste management areas are good waste disposal procedures. Keep outside areas neat, clean, and orderly.

Approach

Solid Waste Management

7. Keep dumpsters, trashcans and recycling bins covered and properly contained, except when filling or emptying. Schedule pickup frequency to keep trash from holding the cover open. Open lids allow contact with storm water, which dissolves and transports contaminants into the storm water system. Open lids also invite pests to spread trash around.
8. Do not put liquid or grease in trash containers.
9. Check the dumpster or trashcan to ensure it is in good condition with no holes or accumulation of grime. Trash containers should be leak-free.
10. Regularly inspect the trash enclosure and general area for problems such as trash not in the container and accumulation of grease or food

on the ground. Clean the trash enclosure as needed to remove any accumulations of grim and/or general trash.

11. Designate an area for trash collection away from storm drains. This allows problems at the trash container to be corrected before reaching the storm drain or flow offsite.
12. Minimize storage of scrap metal by disposing of it periodically. Cover the stockpile during rain to reduce the release of contaminants.

Hazardous Waste Management

1. Use the entire product before disposing of the container. Follow the manufacturer's direction on storage, usage and disposal. Do not remove the original product label as it contains important safety and disposal information. MSDS information should be consulted for each product that is stored or handled.
2. Use appropriate containment devices where the potential for spills exist. Keep hazardous waste in appropriate containers and under cover. Place hazardous waste containers in secondary containment. Do not allow hazardous materials to accumulate on the ground.
3. Keep hazardous and non-hazardous waste separate.
4. Check waste management areas for spills and leaks.
5. Check with the manufacturer, OSHA, TOSHA or poison control with questions or concerns.

Material & Hazardous Waste Storage

Goal

Prevent or reduce the discharge of pollutants to storm water from material delivery and storage by minimizing the storage of hazardous materials on-site, storing materials in a designated area, installing secondary containment, conducting regular inspections, and training employees and subcontractors.

Commonly Stored Materials

1. Sand, salt, rock, and top soil
2. Pesticides and herbicides
3. Fertilizers
4. Detergents
5. Petroleum products
6. Acids, lime, glues, paints, solvents, etc.
7. Spill response materials

Approach

1. Designated areas for material storage are found throughout the complex.
2. Refer to the MSDS binder to follow manufacturer's instructions regarding uses, protective equipment, ventilation, flammability, and mixing of chemicals.
3. Always store materials and wastes indoors or under cover whenever possible.
4. Minimize storage needs by purchasing smaller amounts of material more frequently and as needed for specific jobs. Stockpiling materials, which often must be stored outside and exposed to storm water, increases the possibility of pollutants flowing offsite.
5. Store chemicals away from doors and out of traffic pathways.
6. Use drip pans (or other containment device) under taps, nozzles, and spouts to catch drips.
7. If transferring the contents of a leaking container promptly to another container, properly label the new container.
8. Store parts (i.e., vehicle, electronic, mechanical, etc.) under cover to prevent the leaching of any materials into storm water runoff.
9. Stockpiles of gravel, asphalt, sand, salt, top soil, and other raw materials should be stored on a paved or concreted surface and contained in order to prevent storm water flowing through and off of the stockpile.
10. Conduct preventative maintenance on a routine basis on secondary containment structures, pipes, valves, pumps and other equipment to ensure proper operation and to identify potential leaks.
11. Return equipment and material to their proper storage place after use.
12. Schedule regular cleaning of outside storage areas and yards. Review the stockpiled equipment and supplies (materials). Often there are unusable materials at the back of the storage area. Usable materials should be stored to indicate possible use and to minimize contact with storm water. Unused or unusable material should be removed as soon as possible. Develop a plan to regularly dispose of unneeded materials.
13. Provide an easily-accessible MSDS binder.

Vehicle & Equipment

Fueling

Goal

Prevent fuel spills and leaks and reduce their impacts to stormwater by using off-site facilities, fueling in designated areas only, enclosing or covering stored fuel,

implementing spill controls, and training employees and subcontractors. Ensure above-ground storage tanks have correctly functioning secondary containment.

Approach

4. Discourage topping-off of fuel tanks to reduce accidental spillage. Post "no topping-off" signs at the fuel islands. Encourage the use of 'hold open latches' on fuel nozzles.
5. Promptly clean up any spill of liquid or solid wastes. Do not hose down an area to clean or handle a spill, unless the liquid will be completely contained, cleaned up and disposed of appropriately for the waste type. Do not discharge any clean-up liquid to storm drains.
6. Regularly inspect oil/water separator and sumps; conduct maintenance as needed.

Maintenance

1. Keep ample supplies of spill cleanup materials on site.
2. Pumps are on a routine monthly and annual inspection and maintenance program which is regulated by the State.

Washing & Cleaning

Goal

Prevent or reduce the discharge of pollutants to stormwater from vehicle and equipment cleaning by using off-site facilities, washing in designated, contained areas only, eliminating discharges to the storm drain by infiltrating or recycling the wash water, and training employees and subcontractors.

Approach

8. Use designated wash areas to prevent wash water from entering the storm sewer system.
9. Use phosphate-free, biodegradable soaps.
10. Do not use solvents.
11. When cleaning vehicles/equipment:
    a. Use as little water as possible to avoid having to install erosion and sediment controls for the wash area. High pressure sprayers may use less water than a hose.
    b. Use positive shutoff valve to minimize water usage.
12. Clean leaks, drips, and other spills with as little water as possible. Use rags for small spills, a damp mop for general cleanup, and dry absorbent material for larger spills. Use the following three-step method for cleaning floors:
    a. Clean spills with rags or other absorbent materials.
    b. Sweep floor using dry absorbent material.
    c. Mop floor.

13. Keep equipment clean; don't allow excessive build-up of oil and grease.
14. Keep drip pans or containers under the areas that might drip.
15. If possible, eliminate or reduce the amount of hazardous materials and waste by substituting non-hazardous or less hazardous materials.

Leak & Spill Control

Goal

Prevent or reduce the discharge of pollutants to storm water from vehicle leaks and spills by reducing the chance for spills, stopping the source of spills, containing and cleaning up spills, properly disposing of spill materials, and training employees.

Approach

6. Perform fluid removal and changes inside or under cover on paved surfaces.
7. Properly store hazardous materials and waste.
8. Have spill cleanup supplies readily available.
9. Use dry cleanup methods.
10. Make sure incoming vehicles are checked for leaking oil and fluids.

Maintenance

Goal

Prevent or reduce the discharge of pollutants to stormwater from vehicle maintenance. This BMP is likely to partially reduce sediment, nutrients, toxic materials, oil and grease, and heavy metals.

Approach

7. Perform maintenance using indoor facilities instead of outside whenever possible as to protect the stormwater runoff. If maintenance should be done outside, ensure correct procedures are followed where prevention practices for spills and leaks can be practiced if needed.
8. If an outdoor maintenance area is needed, it should be located on a paved concrete surface in order to facilitate cleanup. Use barriers to prevent stormwater runoff from entering the area.
9. Use a secondary containment such as a drain pan or drop cloth to catch spills or leaks. Keep a drip pan under the vehicle when removing hoses, filters, or other parts.
10. Have an ample supply of cleanup materials where they are readily accessible and properly stored.
11. Clean leaks and other spills with as little amount of water as possible. Use rags for small spills, a damp mop for general cleanup and dry absorbent materials for larger spills.

12. Provide spill containment dikes or secondary containment around stored oil and chemical drums.

Sanitary Sewer Maintenance

Goal

Prevent or reduce the discharge of pollutants to stormwater system and natural streams from sanitary and septic waste. Provide convenient and well-maintained restroom facilities. Arrange for permanent connections to the sanitary sewer system or schedule for regular service and disposal. This management practice will significantly reduce nutrients, bacteria and viruses, and oxygen demanding substances.

Approach

1. To contact the City's sewer department, call (615) 859-2740.

Street Sweeping

The City of Goodlettsville sweeps all curb and gutter streets on a monthly basis.