



NOTICE OF COVERAGE UNDER THE NPDES GENERAL PERMIT  
FOR DISCHARGES FROM  
**SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEM  
(MS4)**

**Tracking No. TNS075213**

**DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
DIVISION OF WATER RESOURCES**  
William R. Snodgrass - Tennessee Tower  
312 Rosa L. Parks Avenue, 11<sup>th</sup> Floor  
Nashville, Tennessee 37243-1102

Under authority of the Tennessee Water Quality Control Act of 1977 (T.C.A. 69-3-101 *et seq.*) and approval from the United States Environmental Protection Agency under the Federal Water Pollution Control Act, as amended by the Clean Water Act of 1977 (33 U.S.C. 1251, *et seq.*) and the Water Quality Act of 1987, P.L. 100-4, the following operator of a small municipal separate storm sewer system is authorized to discharge stormwater runoff into the waters of the State of Tennessee in accordance with the various eligibility criteria, administrative procedures, program requirements, reporting requirements, etc. set forth in parts 1 through 7 of Tennessee small municipal separate storm sewer system NPDES general permit, issued September 30, 2016:

discharger: **City of Cleveland**

is authorized to discharge: stormwater runoff

from the City of Cleveland MS4 separate storm sewer system located in: Bradley County

to waters of the state, in accordance with the required program elements and other conditions set forth in the Tennessee small MS4 general permit.

Coverage under this general permit shall become effective on: **May 1, 2017**

and shall expire on: **September 30, 2021**

Notice of Coverage issued: **April 3, 2017**

NPDES General MS4 Permit is located at <http://www.tn.gov/environment/article/permit-water-stormwater-discharges-permitting>



**STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
DIVISION OF WATER RESOURCES**

William R. Snodgrass - Tennessee Tower  
312 Rosa L. Parks Avenue, 11<sup>th</sup> Floor  
Nashville, Tennessee 37243-1102

March 29, 2017

Honorable Tom Rowland  
Mayor  
City of Cleveland MS4  
e-copy: trowland@clevelandtn.com  
PO Box 1519  
Cleveland, TN 37364

**Subject: NPDES Tracking Number TNS075213  
TN NPDES General Permit for Small Municipal Storm Sewer Systems  
Cleveland, Bradley County, Tennessee**

Dear Mayor Rowland:

The Division of Water Resources has received your Notice of Intent (NOI) on January 27, 2017, as required by Part 2 of the NPDES General Permit for Small Municipal Separate Storm Sewer Systems (TNS000000). We have completed a review of the NOI for accuracy and completeness, and are issuing the attached Notice of Coverage (NOC). Issuance of the NOC does not certify that the NOI adequately provides for all requirements as specified in the MS4 permit. It is the responsibility of the MS4 to implement, maintain, modify, and improve Best Management Practices that are sufficient to prevent pollution and to remain in compliance with all terms and conditions of the MS4 permit.

If you have questions, please contact the division at the Chattanooga Environmental Field Office at 1-888-891-TDEC; or, at this office, please contact Mr. Paul Higgins at (615) 532-1178 or by E-mail at *Paul.Higgins@tn.gov*.

Sincerely,

Vojin Janjić  
Manager, Water-based Systems

cc: Permit File  
Chattanooga Environmental Field Office, michael.bascom@tn.gov  
Chris Broom, MS4 Program Manager, Cleveland Stormwater Division, cbroom@clevelandtn.gov  
Mr. Jonathan Jobe, Public Works Director, City of Cleveland, jjobe@clevelandtn.gov



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

|                        |
|------------------------|
| <b>PROGRAM CONTACT</b> |
| Christopher Broom      |
| Name                   |
| cbroom@clevelandtn.gov |
| Email Address          |
| 423-479-1913           |
| Phone Number           |

|                          |
|--------------------------|
| <b>TECHNICAL CONTACT</b> |
| Christopher Broom        |
| Name                     |
| cbroom@clevelandtn.gov   |
| Email Address            |
| 423-479-1913             |
| Phone Number             |

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

**PART II - DESCRIPTION OF STORM SEWER SYSTEM**

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

For a city, town, university, or utility district university or military base:

|   |              |
|---|--------------|
| Provide jurisdiction area within current boundaries | <u>30</u>    |
| Provide additional area of urban growth boundary    | <u>25.63</u> |

For a county:

|   |       |
|---|-------|
| Provide total area:                         | _____ |
| Provide area that is unincorporated         | _____ |
| Provide unincorporated, urbanized area (UA) | _____ |

Indicate by checking the appropriate box if the permit will be used to regulate non-UA portions of the county:

- No
- Yes, the entire county (unincorporated)
- Yes, the non-UA portions, as follows: \_\_\_\_\_

**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>1,210,118</u> (miles or feet) | Open Ditches | <u>1,021,384</u> (miles or feet) |
| Culverts                      | <u>555</u>                       | Catch Basins | <u>8,548</u>                     |
| Water Quality Treatment Ponds | <u>6</u>                         |              |                                  |





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

**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 by me, or under my direction or supervision. The submitted information 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. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury."

  
Signature

Mayor  
Title/Municipality

1-26-17  
Date

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Title/Municipality

\_\_\_\_\_  
Date

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

**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 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. 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, instream 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: The MS4 maintains an active website that contains ordinances, guidance documents, training opportunities, and links to state and federal agencies. This information is targeted to the engineering, development, and construction community. The MS4 has developed material that includes but not limited to: written brochures, public service announcements, door hangers, pet waste bags, etc. These are distributed through the schools, public events, etc. by partnering with Cleveland/Bradley County KAB. The MS4 is also a member of the TAB program through TNSA, with Stormwater outreach conducted by television and radio. The public, the development and commercial communities are all targeted with material specific to the audience.

Yes  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:

1. Hold Project WET training for City School Teachers targeting elementary, middle, and high school teachers-children

2. Co-sponsor UT Erosion & Sediment Control Certification Class - developers & construction workers.

3. Conduct Stormwater Presentations that cover pollution and its impacts along with stormwater program updates -civic groups

4. Partner with Keep America Beautiful on two Hazardous Waste Collection Days a year- General public

5. Host two stream cleanups per year- school age children, environmental groups, and general public.

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: Public announcement in the Cleveland Daily Banner (paper), announced on Mix 104.1 (radio), and posted on the city's website (www.clevelandtn.gov).

Yes  No

**B. Proposed Activities:**

1. 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.

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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/or a structure which guides and encourages the public in participation. 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. In both cases, your proposed program should describe how you will accomplish this, along with a time schedule.

| PROPOSED BEST MANAGEMENT PRACTICES FOR PUBLIC EDUCATION AND PUBLIC PARTICIPATION |  |  |
|--|--|--|
| BMP  | Name                                   | DESCRIPTION  |
| 1A.  | City of Cleveland Stormwater Website   | Up-to-Date information on stormwater program and activities posted on the internet.      |
| 1B.  | Stormwater Education in Public Schools | Conduct Project Wet Training for Teachers in Cleveland Public Schools                    |
| 1C.  | Stormwater Education Materials         | Continue to update and distribute education materials and TAB public radio announcements |
| 1D.  | Promote Hazardous Waste collection     | Promote and assist Keep America Beautiful with Hazardous Waste Collection Day            |

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

2. What specific groups will be targeted (e.g., service industries such as carpet cleaning, lawn care, civic groups, schools, church groups) if applicable: Builders, Developers, Civic Groups, Lawncare, General Public, Teachers, and School Children

**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      |
| Christopher Broom  | Stormwater Coordinator |

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

| OTHER DEPARTMENT(S)    | ROLE                                     |
|------------------------|--|
| Keep America Beautiful | Help hold Hazardous Waste Collection Day |
| GIS Department         | Help with maps for public advertisements |
|                        |  |

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                                       |
|-------------------------------|---|
| Bradley County Stormwater     | 1B Stormwater Education in Public Schools |
| Hamilton County Water Quality | 1B Stormwater Education in Public Schools |
| TNSA                          | 1C Stormwater Education Materials         |

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.

**Phase II Stormwater Permit Notice of Intent (NOI)  
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| ENTITY | BMP |
|--------|-----|
|        |     |
|        |     |
|        |     |

**SECTION 2 - ILLICIT DISCHARGE DETECTION AND ELIMINATION**

**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 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 have a storm sewer system map that shows the location of system outfalls where the municipal storm sewer system discharges into receiving waters or conveyances owned or operated by another MS4? The map must also show: the names and location of waters that receive discharges from those outfalls; inputs into the storm sewer collection system, such as the inlets, catch basins, drop structures or other defined contributing points to the sewerhead of that outfall; and general direction of stormwater flow.

Yes  No

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

Yes  No  Page Number 48 Paragraph Number Section 18-310 (1)

3. 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 authorized or unauthorized non-stormwater discharges?

Yes  No

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

Yes  No

5. Does the ordinance or regulatory mechanism prohibit dumping?

Yes  No

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

Yes  No  Page Number 48 Paragraph Number Section 18-310 (2)

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

Yes  No  Maximum Penalty \$5,000 Page Number 51 Paragraph Number Section 18-312 (1)

**Phase II Stormwater Permit Notice of Intent (NOI)  
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8. Does the municipality presently have personnel and procedures in place to detect, identify and eliminate non-stormwater discharges? If yes, describe and indicate percentage of system inspected: See Appendix C "Guidelines and Standard Operating Procedures for the City of Cleveland, TN" - 100%

Yes  No

9. Does the municipality presently have procedures and personnel in place for enforcement of violations of the illicit discharge ordinance? If yes, describe: See Appendix C "Guidelines and Standard Operating Procedures for the City of Cleveland, TN"

Yes  No

10. Describe how enforcement actions are documented: See Appendix C "Guidelines and Standard Operating Procedures for the City of Cleveland, TN"

11. Has the municipality defined "hot spots" for non-stormwater discharge screening and inspection purposes? If yes, describe and provide a map of illicit discharge screening hot spots: Appendix D

Yes  No

12. 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 yes, provide brief description: responsible departments, personnel, steps followed: Calls and complaints are logged into a call monitoring software and a work order is generated and sent to the Stormwater Division.

Yes  No

**B. Proposed Activities:**

1. List the 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.  | Stormwater Board Conduct Public Meetings                       | Advertise & conduct meetings that are open to the public.                    |
| 2B.  | Attend and Sponsor Community Activity Days Throughout the Year | Attend events such as "It's all about the green" and "Chalk the Walk"        |
| 2C.  | Stormwater Quality Complaints & Referrals                      | Continue complaint tracking with Qalert and MS4Web tracking software.        |
| 2D.  | Stream Cleanup Events  | Hold two or more stream cleanups during low flow periods throughout the year |

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

2. What specific groups will be targeted, if applicable? Entire Public - School Age Children - Civil Groups

**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      |
| Christopher Broom  | Stormwater Coordinator |

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

**Phase II Stormwater Permit Notice of Intent (NOI)  
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| OTHER DEPARTMENT(S)          | ROLE  |
|------------------------------|---|
| Cleveland/Bradley County KAB | Help with hosting stream cleanup events           |
| GIS Department               | Help with setup and hosting stream cleanup events |
| Public Works Department      | Provides dump trucks for stream cleanup events    |

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                      |
|------------------------------|--------------------------|
| Bradley County Water Quality | 2D Stream Cleanup Events |
| Cleveland High Biology Club  | 2D Stream Cleanup Events |
| Boy and Girl Scouts          | 2D Stream Cleanup Events |

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.

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: Cleveland Daily Banner and City's website ([www.clevelandtn.gov](http://www.clevelandtn.gov))

Yes  No

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 paragraph number(s). If No, proceed to the next set of questions below about construction site plans review.

Yes  No  Page Number 19-38 Paragraph Number Section 18-306 (1-13)

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 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 13-14 Paragraph Number Section 18-305 (1)

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.

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Yes

No

Page Number 19

Paragraph Number Section 18-306  
(1)

6. Do those technical standards meet or exceed the current effective Tennessee Construction General Permit (TNR100000) requirements for design storm and special conditions for waterbodies with unavailable parameters or Exceptional Tennessee Waters?

Yes

No

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

Yes

No

8. 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

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

Yes

No

10. Does the review process include a requirement for pre-construction meeting between the municipality and site developer, for priority construction sites?

Yes

No

11. If there is a review process, provide a brief narrative or a flow chart of the process, describing the process steps, responsible personnel, and criteria used for evaluation of information or plans that are submitted: See Appendix E

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

Yes

No

If yes, provide a brief narrative of the receipt process and procedures, describing process steps, responsible departments, personnel (by title). All calls are entered into complaint tracking software and forwarded to the Stormwater Division. The Stormwater Technician then inspects and if a violation persists then the case is forwarded to the Stormwater Coordinator for further action. If complaint is resolved, then the work order is closed.

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

Yes

No

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

Yes

No

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

Yes

No

16. Does the municipality use a Stop Work or similar order to enforce compliance with construction site policies and requirements?

Yes

No

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17. How are enforcement actions documented? All actions are logged into the city's construction site inspection software and any violation letters are kept on file.

18. Have MS4 inspectors who conduct inspections of construction sites received certification under the Tennessee Fundamentals of Erosion Prevention and Sediment Control, Level 1, and construction site plan reviewers a certificate of completion from the Tennessee Erosion Prevention and Sediment Control Design Course, Level 2?

Yes  No

**B. Proposed Activities:**

1. List the 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.   | Erosion & Sediment Control Training              | Hold and/or sponsor UT Level I, Level II and Recertification Training Classes in Cleveland and Chattanooga area for Developers and Construction Personal |
| 3B.   | Illicit Discharge Identification                 | Complaint Tracking   |
| 3C.   | Review MS4 Outfalls                              | Inspect all Outfalls in the MS4  |
| 3D.   | Illicit Discharge Prevention Storm Drain Markers | Install storm drain markers  |

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

2. Describe specific groups that will be targeted, if applicable: General Public, Development Community, and Industry

**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      |
| Christopher Broom   | Stormwater Coordinator |

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

| OTHER DEPARTMENT(S) | ROLE                             |
|---------------------|----------------------------------|
| GIS                 | GIS data for outfall inspections |
| Public Works        | Intallation of drain markers     |
|                     |                                  |

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                      |
|------------------------------|--------------------------|
| UT                           | 3A Hold Training Classes |
| Bradley County Water Quality | 3A Hold Training Classes |
|                              |                          |

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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 STORMWATER MANAGEMENT AT NEW DEVELOPMENT AND REDEVELOPMENT**

**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.

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 pollutant removal controls; stormwater detention or storage; practices that infiltrate stormwater; vegetative practices.

Yes  No

If yes, 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): Page 19 Section 18-306 (1) "Stormwater quality best management practices manual"  
Responsible Department/ Personnel: Stormwater Division/ Stormwater Coordinator

2. 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 and paragraph number. If no, proceed to the next section on permanent stormwater management plans review.

Yes  No  Page Number 30-38 Paragraph Number Section 18-306 (9-13)

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

Yes  No  Page Number 30 Paragraph Number Section 18-306 (9)

4. 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.

Yes  No  Page Number 36 Paragraph Number Section 18-306 (13)

5. Does the ordinance or regulatory mechanism contain or reference technical standards for water quality controls? If yes, note page number and paragraph number.

Yes  No  Page Number 36 Paragraph Number Section 18-306 (13)

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6. 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 30-33 Paragraph Number Section 18-306 (9-10)

7. 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 16 Paragraph Number Section 18-305 (5)

8. 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, note page number and paragraph number.

Yes  No  Page Number 13 Paragraph Number Section 18-304 (3)

9. 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 50-53 Paragraph Number Sections 18-311 and 18-312

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

Yes  No  Page Number 38-40 Paragraph Number Section 18-307 (1-5)

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

Yes  No

12. 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: See Appendix E

**B. Proposed Activities:**

List the BMPs that you will implement in the area of the Permanent Stormwater Management Plans Review. These should be based on a set of priorities that you have identified in the area of the Permanent Stormwater Management Plans Review. 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 PLANS REVIEW |                            |   |
|--|----------------------------|---|
| BMP  | Name                       | DESCRIPTION                               |
| 4A.  | Post Construction Tracking | Map and track all post construction BMP's |

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|     |  |  |
|-----|--|--|
| 4B. | Regional Detention Pond  | Partner with the Army Corps of Engineers to construct a series of two ponds in the Fillauer Branch Watershed.  |
| 4C. | Inspection of Post Construction BMP's                            | Inspect all post construction BMP's in the City in a 4-year period.  |
| 4D. | Ordinance Review of Permanent Stormwater Management Requirements | Continue with existing program of treating the first flush volume of 1" for 80% TSS removal. During the first 12 months of coverage the City of Cleveland will review additional options and flexibility in the new permit, and make any necessary revisions to the stormwater ordinance. The goal is full implementation at the end of 12 months from the date of coverage. |

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

Describe the specific groups that will be targeted, if applicable? Developers and General Public

**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      |
| Christopher Broom   | Stormwater Coordinator |

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

| OTHER DEPARTMENT(S) | ROLE                  |
|---------------------|-----------------------|
| Public Works        | Construction of ponds |
|                     |                       |
|                     |                       |

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                             |
|-------------------------|---------------------------------|
| Army Corps of Engineers | BMP 4B: Regional Detention Pond |
|                         |                                 |
|                         |                                 |

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:**

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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. Each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

1. Does the municipality's current Pollution Prevention/Good Housekeeping program provide annual training for employees responsible for municipal operations at facilities within the jurisdiction of the permittee that handle, generate and/or store materials which constitute a potential pollutant of concern for MS4s? Examples of these materials may include, but are not limited to, lubricants, fuels, sand, gravel, soil, salt, pesticide, fertilizer, garbage, trash, clippings, vehicles, equipment, and other wastes.

Yes  No

2. Are training activities documented? If yes, describe training and method of record-keeping: Stormwater staff trains all City employees that work in the Public Works, Parks and Recreation, and Fleet Departments. Training consist of a video, pre-test, and post-test. The results are kept on file in Stormwater Division.

All supervisors and engineering staff have level one training and carry TDEC Level one card. Stormwater staff, City Engineer, Public Works Director, and Assistant Parks and Recreation Director have level one & two training.

Yes  No

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

Yes  No  Permit Numbers(s) \_\_\_\_\_

4. List municipal operations or facilities that have a potential for contaminating stormwater runoff such as the following: streets, roads, highways, municipal parking lots, maintenance and storage yards, fleet or maintenance shops with outdoor storage areas, salt/sand storage locations, snow disposal areas operated by the MS4, and waste disposal, storage, and transfer stations. If there is more than one facility for a given type of operation; give the number of such facilities. Indicate if an operation and maintenance plan, which includes maintenance activities, schedules and the proper disposal of waste from related structural and non-structural stormwater controls, has been implemented for each facility or operation.

| FACILITY OR TYPE OF OPERATION   | NUMBER OF FACILITIES | OPERATION AND MAINTENANCE PLAN IMPLEMENTED?                         |
|---------------------------------|----------------------|---|
| Public Works Facilities         | 2                    | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |
| Fleet                           | 1                    | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |
| Parks and Recreation Facilities | 9                    | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |
| Cleveland Minicipal Jetport     | 1                    | 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"/>            |
|                                 |                      | 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"/>            |
|                                 |                      | Yes <input type="checkbox"/> No <input type="checkbox"/>            |
|                                 |                      | Yes <input type="checkbox"/> No <input type="checkbox"/>            |

**B. Proposed Activities:**

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

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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.

| PROPOSED BEST MANAGEMENT PRACTICES FOR POLLUTION PREVENTION AND HOUSEKEEPING |  |  |
|--|--|--|
| BMP  | Name                                   | DESCRIPTION  |
| 5A.  | Employee Pollution Prevention Training | Identify Municipal operations & services where an adverse impact on water quality could occur. Hold training classes for City employees on how to implement stormwater BMP's while on the job. |
| 5B.  | Floatables Reduction                   | Implement trash and litter container plan.   |
| 5C.  | Floatables - Trash Litter Reduction    | Intercept floatables on municipal roadways and right of ways prior to discharge to MS4 utilizing municipal operations and public recognition of the problem through partnerships.              |
| 5D.  | Facility Inspections                   | Inspect city facilities to ensure water quality compliance.  |

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

Provide specific groups that will be targeted, if applicable: City Employees and General Public

**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      |
| Christopher Broom  | Stormwater Coordinator |

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

| OTHER DEPARTMENT(S) | ROLE             |
|---------------------|------------------|
| Public Works        | Litter reduction |
| Parks & Recreation  | Litter reduction |
|                     |                  |

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                                    |
|------------------------------|--|
| Cleveland/Bradley County KAB | 5C Floatables - Trash Litter Reduction |
|                              |  |

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 |
|--------|-----|
|        |     |
|        |     |

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**ADDENDUM TO SMALL MS4 NPDES PERMIT NOI - 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, 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.

| <b>BEST MANAGEMENT PRACTICES FOR PUBLIC EDUCATION AND PUBLIC PARTICIPATION</b> |   |
|--|---|
| <b>BMP 1A</b>  | <b>MEASURABLE GOALS AND MILESTONES</b>  |
| Goal(s)  | Update City of Cleveland's Stormwater Website   |
| Milestone Year 1   | Maintain the stormwater website to ensure it contains current ordinances and events for each month.   |
| Milestone Year 2   | Evaluate and continue to update site.   |
| Milestone Year 3   | Evaluate and continue to update site.   |
| Milestone Year 4   | Evaluate and continue to update site.   |
| Milestone Year 5   | Evaluate and continue to update site.   |
| <b>BMP 1B</b>  | <b>MEASURABLE GOALS AND MILESTONES</b>  |
| Goal(s)  | Stormwater Education in Public Schools Project Wet of Tennessee - Teacher Training  |
| Milestone Year 1   | Conduct a Project Wet training course by partnering with Hamilton Co, & Bradley Co Stormwater Programs  |
| Milestone Year 2   | Evaluate and continue   |
| Milestone Year 3   | Evaluate and continue   |
| Milestone Year 4   | Evaluate and continue   |
| Milestone Year 5   | Evaluate and continue   |
| <b>BMP 1C</b>  | <b>MEASURABLE GOALS AND MILESTONES</b>  |
| Goal(s)  | Stormwater Education Materials: Develop and distribute construction guidance documents, brochures, flyers, press releases, and participate in TAB program for state wide stormwater education campaign.   |
| Milestone Year 1   | Minimum of 6 distributions per year and evaluate TAB report   |
| Milestone Year 2   | Evaluate and continue   |
| Milestone Year 3   | Evaluate and continue   |
| Milestone Year 4   | Evaluate and continue   |
| Milestone Year 5   | Evaluate and continue   |
| <b>BMP 1D</b>  | <b>MEASURABLE GOALS AND MILESTONES</b>  |
| Goal(s)  | Promote and assist with Hazardous Waste Collection Day by partnering with Cleveland/Bradley County Keep America Beautiful to provide public outreach on the connection of water quality and inappropriate waste disposal practices through recognition of Hazardous Waste Collection Day. With the goal of Reducing illegal dumping in the City of Cleveland. |
| Milestone Year 1   | Promote and assist with 2 events per year   |
| Milestone Year 2   | Evaluate and continue   |
| Milestone Year 3   | Evaluate and continue   |
| Milestone Year 4   | Evaluate and continue   |
| Milestone Year 5   | Evaluate and continue   |

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| <b>BEST MANAGEMENT PRACTICES FOR ILLICIT DISCHARGE DETECTION AND ELIMINATION</b> |  |
|--|--|
| <b>BMP 2A</b>  | <b>MEASURABLE GOALS AND MILESTONES</b>                             |
| Goal(s)  | Conduct Stormwater Board public meetings.                          |
| Milestone Year 1   | Board to meet as needed to hear appeals and/or variance requests.  |
| Milestone Year 2   | Evaluate and continue  |
| Milestone Year 3   | Evaluate and continue  |
| Milestone Year 4   | Evaluate and continue  |
| Milestone Year 5   | Evaluate and continue  |
| <b>BMP 2B</b>  | <b>MEASURABLE GOALS AND MILESTONES</b>                             |
| Goal(s)  | Attend and Sponsor Community Activity Days Throughout the Year     |
| Milestone Year 1   | Attend and sponsor "It's All About the Green" and "Chalk the Walk" |
| Milestone Year 2   | Evaluate and continue  |
| Milestone Year 3   | Evaluate and continue  |
| Milestone Year 4   | Evaluate and continue  |
| Milestone Year 5   | Evaluate and continue  |

|                  |   |
|------------------|---|
| <b>BMP 2C</b>    | <b>MEASURABLE GOALS AND MILESTONES</b>  |
| Goal(s)          | Stormwater Quality Complaints & Referrals<br>Tracking by watershed for allocation of resources and follow-up. |
| Milestone Year 1 | Evaluate and continue   |
| Milestone Year 2 | Evaluate and continue   |
| Milestone Year 3 | Evaluate and continue   |
| Milestone Year 4 | Evaluate and continue   |
| Milestone Year 5 | Evaluate and continue   |

|                  |   |
|------------------|---|
| <b>BMP 2D</b>    | <b>MEASURABLE GOALS AND MILESTONES</b>  |
| Goal(s)          | Stream Cleanup Events: Partner with Bradley County Stormwater, Cleveland/Bradley County Keep America Beautiful, and Cleveland High School Environmental and Aquatic Biology.<br>Conduct stream clean up events during low flow periods. |
| Milestone Year 1 | Hold 2 stream cleanup events per year.  |
| Milestone Year 2 | Evaluate and continue   |
| Milestone Year 3 | Evaluate and continue   |
| Milestone Year 4 | Evaluate and continue   |
| Milestone Year 5 | Evaluate and continue   |

| <b>BEST MANAGEMENT PRACTICES FOR CONSTRUCTION SITE RUNOFF PROGRAM</b> |  |
|---|--|
| <b>BMP 3A</b>   | <b>MEASURABLE GOALS AND MILESTONES</b>   |
| Goal(s)   | Erosion and Sediment Control Training  |
| Milestone Year 1  | Hold and/or sponsor UT Level I, Level II and Recertification Training Classes in Cleveland and Chattanooga area for Developers and Construction Personal |
| Milestone Year 2  | Evaluate and continue  |
| Milestone Year 3  | Evaluate and continue  |
| Milestone Year 4  | Evaluate and continue  |
| Milestone Year 5  | Evaluate and continue  |
| <b>BMP 3B</b>   | <b>MEASURABLE GOALS AND MILESTONES</b>   |
| Goal(s)   | Illicit Discharge Identification   |
| Milestone Year 1  | Continue to log, track, and map all illicit discharge complaints with current tracking software.   |
| Milestone Year 2  | Evaluate and continue  |
| Milestone Year 3  | Evaluate and continue  |
| Milestone Year 4  | Evaluate and continue  |
| Milestone Year 5  | Evaluate and continue  |

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|                  |  |
|------------------|--|
| <b>BMP 3C</b>    | <b>MEASURABLE GOALS AND MILESTONES</b> |
| Goal(s)          | Inspect MS4 Outfalls                   |
| Milestone Year 1 | Inspect and photograph all outfalls.   |
| Milestone Year 2 | Inspect and photograph all outfalls.   |
| Milestone Year 3 | Inspect and photograph all outfalls.   |
| Milestone Year 4 | Inspect and photograph all outfalls.   |
| Milestone Year 5 | Inspect and photograph all outfalls.   |

|                  |  |
|------------------|--|
| <b>BMP 3D</b>    | <b>MEASURABLE GOALS AND MILESTONES</b>   |
| Goal(s)          | Illicit Discharge Prevention   |
| Milestone Year 1 | Install 150 Lexan Drain Markers and purchase and install one (1) dog walk waste station. |
| Milestone Year 2 | Evaluate and continue  |
| Milestone Year 3 | Evaluate and continue  |
| Milestone Year 4 | Evaluate and continue  |
| Milestone Year 5 | Evaluate and continue  |

**BEST MANAGEMENT PRACTICES FOR PERMANENT (POST-CONSTRUCTION) STORMWATER MANAGEMENT PROGRAM**

|                  |   |
|------------------|---|
| <b>BMP 4A</b>    | <b>MEASURABLE GOALS AND MILESTONES</b>  |
| Goal(s)          | Post Construction Tracking  |
| Milestone Year 1 | Continue to track post construction BMP's with the current tracking software. |
| Milestone Year 2 | Evaluate and continue   |
| Milestone Year 3 | Evaluate and continue   |
| Milestone Year 4 | Evaluate and continue   |
| Milestone Year 5 | Evaluate and continue   |

|                  |  |
|------------------|--|
| <b>BMP 4B</b>    | <b>MEASURABLE GOALS AND MILESTONES</b>   |
| Goal(s)          | Regional Detention Pond: Partner with the Army Corps of Engineers to construct a series of three ponds in the Fillauer Branch Watershed. |
| Milestone Year 1 | Secure funding   |
| Milestone Year 2 | Develop scope of design for engineering services, proceed with environmental assessment  |
| Milestone Year 3 | Develop bid specifications   |
| Milestone Year 4 | Advertise for bids proceed with construction   |
| Milestone Year 5 | Complete construction  |

|                  |  |
|------------------|--|
| <b>BMP 4C</b>    | <b>MEASURABLE GOALS AND MILESTONES</b>   |
| Goal(s)          | Inspection of Post Construction BMP'S  |
| Milestone Year 1 | Inspect post construction BMP's in city and map newly constructed BMP's on GIS |
| Milestone Year 2 | Evaluate and continue  |
| Milestone Year 3 | Evaluate and continue  |
| Milestone Year 4 | Evaluate and continue  |
| Milestone Year 5 | Evaluate and continue  |

|                  |  |
|------------------|--|
| <b>BMP 4D</b>    | <b>MEASURABLE GOALS AND MILESTONES</b>   |
| Goal(s)          | Continue with existing program of treating the first flush volume of 1" for 80% TSS removal. During the first 12 months of coverage the City of Cleveland will review additional options and flexibility in the new permit, and make any necessary revisions to the stormwater ordinance. The goal is full implementation at the end of 12 months from the date of coverage. |
| Milestone Year 1 | Review additional options and flexibility in the new permit, and make any necessary revisions to the stormwater ordinance. Take changes to Stormwater Board, City Council, and TDEC for approval within 12 months of coverage.   |
| Milestone Year 2 | Implement ordinance  |
| Milestone Year 3 | Evaluate and continue  |
| Milestone Year 4 | Evaluate and continue  |

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|   |  |
|---|--|
| Milestone Year 5  | Evaluate and continue  |
| <b>BEST MANAGEMENT PRACTICES FOR MUNICIPAL POLLUTION PREVENTION AND GOOD HOUSEKEEPING</b> |  |
| <b>BMP 5A</b>   | <b>MEASURABLE GOALS AND MILESTONES</b>   |
| Goal(s)   | Employee Pollution Prevention Plan   |
| Milestone Year 1  | All engineering staff, building inspectors, public works supervisors to obtain and refresh level one certification. Hold good housekeeping training for for city staff.  |
| Milestone Year 2  | Hold good housekeeping training for for city staff.  |
| Milestone Year 3  | Hold good housekeeping training for for city staff.  |
| Milestone Year 4  | Hold good housekeeping training for for city staff.  |
| Milestone Year 5  | Hold good housekeeping training for for city staff.  |
| <b>BMP 5B</b>   | <b>MEASURABLE GOALS AND MILESTONES</b>   |
| Goal(s)   | <p>Floatables Reduction: Intercept floatables on municipal roadways and right of ways prior to discharge to MS4 utilizing municipal operations and public recognition of the problem through partnerships with Keep America Beautiful.</p> <p>Reduce floatables on public right of way prior to discharge to the MS4 and State Waters through municipal street sweeping and debris collection operations, and Community/Bradley Courts Community Service and Keep America Beautiful for right of way trash and litter reduction efforts.</p> |
| Milestone Year 1  | Evaluate and continue  |
| Milestone Year 2  | Evaluate and continue  |
| Milestone Year 3  | Evaluate and continue  |
| Milestone Year 4  | Evaluate and continue  |
| Milestone Year 5  | Evaluate and continue  |
| <b>BMP 5C</b>   | <b>MEASURABLE GOALS AND MILESTONES</b>   |
| Goal(s)   | <p>Floatables - Trash/Litter Reduction: Continue trash and litter container plan to reduce waste discharging into MS4 and State Waters and partner with Keep America Beautiful of Cleveland to promote litter reduction.</p> <p>Provide public trash and litter containers in accordance with plan.</p>  |
| Milestone Year 1  | Purchase and install ten (10) containers along stream greenways and public areas.  |
| Milestone Year 2  | Purchase and install ten (10) containers along stream greenways and public areas.  |
| Milestone Year 3  | Purchase and install ten (10) containers along stream greenways and public areas.  |
| Milestone Year 4  | Purchase and install ten (10) containers along stream greenways and public areas.  |
| Milestone Year 5  | Purchase and install ten (10) containers along stream greenways and public areas.  |
| <b>BMP 5D</b>   | <b>MEASURABLE GOALS AND MILESTONES</b>   |
| Goal(s)   | Facility Inspections   |
| Milestone Year 1  | Inspect all City facilities once a month for stormwater violations.  |
| Milestone Year 2  | Evaluate and continue  |
| Milestone Year 3  | Evaluate and continue  |
| Milestone Year 4  | Evaluate and continue  |
| Milestone Year 5  | Evaluate and continue  |