

Standard Operating Procedures for
Compliance with MS4 General NPDES
Permit



June 2019

The following is a description of how Rutherford County manages their Stormwater Management Program to comply with MS4 NPDES Permit requirements. The County's permit was issued on May 1, 2017 and is set to expire on September 30, 2021. A copy of the MS4 General NPDES Permit can be found in the next section of this document. The section numbers in this SOP correlate with the section numbers of the MS4 General NPDES Permit. In addition to this document consult the Rutherford County Notice of Coverage (NOI) for year milestone to meet for compliance.

Section 4 of the NPDES Permit pertains to the Stormwater Management Program and the requirement and goal the County must meet. It is broke into sub-section and how the County complies with these requirements are as follows.

Section 4.2 Minimum Control Measures

4.2.1 Public Education and Outreach

Rutherford County's main focus to meet this requirement is the work we do jointly with other MS4s in the county. The County and cities have a contract with a part time employee, housed with Rutherford County, to perform stormwater education outreach. The employee trains Rutherford County teachers to become Project WET certified, and give stormwater presentation in the classroom and civil organization when requested. The goals and milestones for the contract can be found in the Rutherford County NOI that was submitted to TDEC.

- Bonnie Ervin bervin@rutherfordcountyttn.gov 615-907-3538
- M:/Project WET

The County also airs stormwater education programs throughout the year on the local Channel 19. These programs air all times of the day in hopes of reaching different audiences. We also have social media posts on facebook.

- Lee in OIT for Channel 19
- Megan Chaffin OIT for Rutherford County Facebook Page
 - G:\Departments\Stormwater\PSA_Public Service Announcements (used Canva)

Once a year the stormwater program takes a day to educate school groups on what is "Stormwater". In the past we have partner with Kid City a program the Planning Department put on with local elementary schools. Also in past, we work with the GIS Department and perform our education at GIS Day. Currently, we do Waterfest with Bonnie and Project WET

- Tree Day
 - Josh Upham City of Murfreesboro jupham@murfreesborotn.gov 848-3200

- Master Gardeners—classes and mini seminars

Our website www.rutherfordcountyttn.gov/stormwater, is updated with the latest news, regulations, forms, manuals, and other materials to educate the public. On our website, you can report stormwater complaints. It is updated as needed, but at least quarterly.

4.2.2 Public Involvement/Participation

To meet the regulations set forth in this section of the permit, the County set up a Stormwater Advisory Committee. In the beginning this committee drafted and approved the Stormwater Management Ordinance. Currently this committee has one scheduled meeting a year and other called meetings throughout the year as needed. The annual meeting is in September when a public hearing is held to present the Annual Report and elections are held. Past meeting notices and minutes are posted on the website for the public to view. All public involvement events are documented and submitted with Annual Report each year.

- SWAC- M:/Stormwater Committee
- Stream Drain Markings, Tree Day/Riparian Repair, Brochures online

4.2.3 Illicit Discharge Detection and Elimination (IDDE)

Rutherford County has setup an IDDE program complies with regulations set forth in the NPDES Permit. The County performs dry weather screens each year on all known outfalls that discharge from the MS4 system into receiving streams. These inspections are performed using GPS and tracked and evaluated in a GIS database.

The County receives complaints via phone calls and from the website. These are tracked and investigated. Once a complaint is investigated if enforcement is necessary the guidelines are set forth in the Enforcement Response Plan.

- http://rutherfordcountyttn.gov/stormwater/illicit_discharge.htm
- Enforcement Response Plan (ERP) Located Stormwater Management Documents (tab 9)
- See Chapter 8 and 9 of Stormwater Ordinance

4.2.4 Construction Site Stormwater Runoff Control

The County has developed a GIS based database to track construction site for compliance. A detailed process on where to save information can be found in the back of this document. (Tab 12) This process starts when developments are submitted for preliminary approval.

1. After site is submitted for approval, a paper folder is created and a copy of the Site Application and the original Land Disturbance Application is placed in the

Stormwater File. Also site is added to GIS the two applications are scanned and attached to the GIS feature and developer information is added to the feature.

- G:/Rutherford/departments/Stormwater/site inspections
2. During the plans review process a Stormwater Quality Checklist needs to be filled out and comments need to be documented. These documents need to be scanned and attached to the GIS feature and the originals be filed in the SW file.
 3. Once site is heard by Planning Commission, update Preliminary Approval (Yes or No) in GIS feature.
 4. Once County has a reviewed Construction Drawings, a Preconstruction Meeting can be scheduled by the developer. The developer, contractor, and developer engineer (if necessary) must attend this meeting. At this meeting contractor needs to fill out PreConstruction Meeting Checklist and fill out and sign the Contractor section of the Land Disturbance Application. If any Permanent BMPs are to be installed a Maintenance Agreement need to be filled out during this meeting and recorded before construction can begin. Once meeting is over developer can then take application to front desk for issuance of Land Disturbance Permit. Once Land Disturbance Permit is issued contractor may install initial erosion and sediment control measures only. At this point if plans do not need any further changes, stamped and signed by the county engineer, scan Construction Drawings, georeference scanned plans, and draw in all stormwater infrastructure in GIS.
 5. Once initial E&S controls are in place contractor is to contact stormwater department for inspection. If site passes inspection then Notice to Proceed is issued and work may start in approved areas.
 6. During Construction County will inspect the site monthly. Inspectors will inspect for site compliance with SWPPP, sediment leaving the site, work being before performed in approved area, and other stormwater issues.
 7. Once site is stable, with permanent stabilization measures not temporary, monthly inspection may stop. Even after monthly inspection have stopped and construction of development has stopped if sediment loss occurs and the permit is still active the permittee is still responsible for damages.

For more information on the Land Disturbance permit process see Land Disturbance section of this document.

4.2.5.2.1 Runoff Reduction (Green Infrastructure)

The runoff reduction requirement, the first one inch of rainfall must be maintained on site, starts March 2014 for Rutherford County. This requirement will vary from MS4 to MS4 depending on issuance of County NOC. The County has developed a map of areas that are suitable for infiltration based on soil character, water table depth, and depth to bedrock. All information on creation of suitable soils map can be found in stormwater filing cabinet and GIS layer of suitable soils found on SDE under Ruthco.

4.2.5.3 Codes and Ordinances Review and Update

Within the first year of our current permit the County was required to review our codes and ordinances using the EPA Water Quality Scorecard. That document was submitted with our annual report that year to TDEC for review. Once the new Subdivision Regulations are approved the scorecard will need to be filled out again and submitted with the annual report for TDEC review.

4.2.5.6 Inventory and Tracking of Management Practices

Rutherford County has created a GIS based tracking system for all BMPs that approved by Planning Commission. These BMPs are digitized from scanned Construction Drawings and saved on ruthco.GA.Permanent_SW_BMPs. Any BMP that is to remain after construction is completed gets inventory and tracked in the County's GIS.

4.2.6 Pollution Prevention / Good Housekeeping for Municipal Operations

As part of permit compliance Rutherford County must have a program in place that the goal of daily municipal operations reduce and prevent pollutant runoff. Also under this requirement all personnel involved in the stormwater manage program have proper certification. Under the current permit all personnel that are involved in the inspection of construction sites must have passed TDEC Level 1 inspection course. For personnel that review plans must have taken the TDEC Level 2 Design course. The goal is also to educate different departments throughout the County when permits are required, how to operate within the required permit, and general overall impacts that their operation has on water quality. Not only do they need to understand the requirements we fall under, but the consequences of not being in compliance. Different Departments also have quizzes on the HR website with videos to watch for proper training.

As a general rule here is the certifications and training that position have.

Engineering staff - All engineering staff will need to keep TDEC Level 1 & 2 current. In addition to these courses engineering staff typical will have at least 12 hours of continuing education on stormwater/engineering topics.

Building Codes Inspectors – These positions need to keep TDEC Level 1 current. In addition to this Stormwater staff will provide education material annual or as needed.

Support Staff- basic powerpoint and quiz regarding stormwater runoff (HR)

Employees at Buildings with SWPPPS- Rain Check videos and quizzes regarding spills and other stormwater BMPs (HR)

4.5 Enforcement Response Plan

If a site fails to comply with any regulation set forth in the Rutherford County Stormwater Management Ordinance, then that site is deemed out of compliance and enforcement actions can be taken as directed by the Rutherford County Enforcement Response Plan. Those penalties range from Verbal Warning to Stop Work Order to Financial Penalty. If an enforcement response is taken it needs to be documented as follows. All originals of any enforcement response need to be filed with the Stormwater files. Copies of the enforcement response will be given to violator. A scanned copy needs to be saved and attached to the GIS feature for the site in violation. If it is a site working without a permit and a GIS feature has not been created then feature needs to be created and all documentation attached to the new feature. There is an enforcement database currently that will roll into CityWorks at a later date.

5 Monitoring, Recordkeeping, and Reporting

5.1 Analytical Monitoring

As required by the permit the County must at a minimum perform analytical monitoring in streams as stated in the TMDL. There are two types of monitoring requirements segments of streams where siltation is the impairment and the other is segments where pathogens are the impairment.

For the streams where pathogens are the cause of impairment, streams must be sampled according the protocol set forth in the MS4 NPDES permit. As of this permit cycle the County has meet on permit requirements. All documentation is filed in the Stormwater files and need to be submitted with the Annual Report when completed per permit cycle year.

For the streams where siltation is the cause of the impairment the County needs to monitor segments according to protocol set forth in MS4 NPDES permit. The county has to prove the segments are not impaired by the county before they can be exempt from testing. The current 303d list and TMDLs will list the source of impairment. The segments that meet the requirement for monitoring must be finished before the permit expires on September 2021.

Currently use MTSU for this Frank Bailey

5.2 Non-analytical Monitoring

The County must perform a Visual Stream Assessment and Inventory on all impaired streams where the County is the source of the impairment. These inspections must be performed once in a five year permit cycle. The County performs these inspections bi-annually on all streams in conjunction with our IDDE program. The data is collected on the collector app and automatically updated to GIS for tracking and analysis.

5.4 Reporting

The County must submit an Annual Report to the Nashville Environmental Field Office (EFO) by September 30 of each year. It must be presented at the public hearing of the annual SWAC meeting before being submitted to the EFO. All monitoring, EPA Scorecard Information, or other material required by the permit to be submitted for EFO review must be included with the Annual Report.