

**TDEC Small MS4 Annual Report  
July 1, 2007 – June 30, 2008  
Report due September 30, 2008**

**Permittee Tracking No. TNS075779**

**Permittee Name: Town of Smyrna**

**This report must be signed by a ranking elected official or by a duly authorized representative of that person. See signatory requirements in part 6.7 of the small MS4 general permit.**

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

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Signed

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Dated

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Printed Name and Title

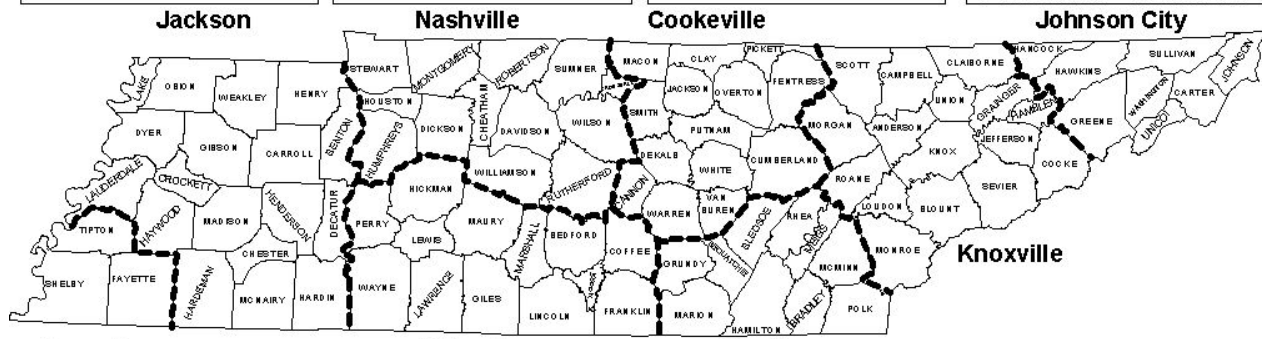
**Send the annual report to the two addresses shown on the next page.**

**Submit your annual report to the Environmental Assistance Center  
for your county as shown in the map below *and* to the following  
address:**

**Vojin Janjic  
Tennessee Division of Water Pollution Control  
L&C Annex, 6<sup>th</sup> Floor  
401 Church Street  
Nashville, TN 37243-1534**

**Tennessee Department of Environment and Conservation  
Environmental Assistance Center Boundaries  
1-888-891-TDEC**

<p><b>Jackson EAC (J)</b> 362 Carriage House Drive Jackson, TN 38305-2222 fax 731-661-6283</p> <p><b>731-512-1300</b></p> <p><i>WPC Mgr - Pat Patrick</i> EAC Mgr - Rudy Collins Env Coord - Vaughn Cassidy Administrator - Carol Pollan</p>	<p><b>Nashville EAC (N)</b> 711 R. S. Gass Boulevard Nashville, TN 37243 fax 615-687-7078</p> <p><b>615-687-7000</b></p> <p><i>WPC Mgr - Joe Holland</i> EAC Mgr - Brenda Apple Env Coord - Charles Jobe Administrator - Steve Janes</p>	<p><b>Cookeville EAC (CK)</b> 1221 South Willow Avenue Cookeville, TN 38506 fax 931-432-6952</p> <p><b>931-432-4015</b></p> <p><i>WPC Mgr - Fran Baker</i> EAC Mgr - Jimmy Lee Clark Env Coord - John Bowers Administrator - D. Jan Tollett</p>	<p><b>Johnson City EAC (JC)</b> 2305 Silverdale Road Johnson City, TN 37601-2162 fax 423-854-5401</p> <p><b>423-854-5400</b></p> <p><i>WPC Mgr - Andrew Tolley</i> EAC Mgr - Mark Braswell Env Coord - Janice Bowers Administrator - Larna Smith</p>
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<p><b>Memphis EAC (M)</b> Suite E-645, Perimeter Park 2510 Mount Moriah Road Memphis, TN 38115-1520 fax 901-368-7979</p> <p><b>901-368-7939</b></p> <p><i>WPC Mgr - Terry Templeton</i> EAC Mgr - Jim Chaney Env Coord - Vaughn Cassidy Administrator - Bill Relker</p>	<p><b>Columbia EAC (CL)</b> 2484 Park Plus Drive Columbia, TN 38401 fax 931-380-3397</p> <p><b>931-380-3371</b></p> <p><i>WPC Mgr - Tim Wilder</i> EAC Mgr - Joe Holmes Env Coord - John Bowers Administrator - Shelia Woodard</p>	<p><b>Chattanooga EAC (CH)</b> Suite 550, State Office Bldg. 540 McCallie Avenue Chattanooga, TN 37402 fax 423-634-6389</p> <p><b>423-634-5745</b></p> <p><i>WPC Mgr - Richard Urban</i> EAC Mgr - Stan Boyd Env Coord - Administrator - Andra Kelley</p>	<p><b>Knoxville EAC (K)</b> Suite 220, State Plaza 2700 Middlebrook Pike Knoxville, TN 37921 fax 865-594-6105</p> <p><b>865-594-6035</b></p> <p><i>WPC Mgr - Paul Schmierbach</i> EAC Mgr - Phil Chambers Env Coord - Mark Penland Administrator - Mark Sweat</p>
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Water Pollution Control

## Table of Contents

<b>I.</b>	<b>Status of Compliance with Permit Conditions (5.4.1) Six Minimum Measures, BMPs and Milestones.....</b>	<b>1</b>
	<b>A. Status of Compliance with BMP Milestones .....</b>	<b>1</b>
	<b>B. Status of compliance for amended and replaced BMPs.....</b>	<b>3</b>
<b>II.</b>	<b>Assessment of the appropriateness of identified BMPs (5.4.1).....</b>	<b>4</b>
<b>III.</b>	<b>Progress with respects to MEP and Measurable Goals (5.4.1).....</b>	<b>6</b>
	<b>A. MEP.....</b>	<b>6</b>
	<b>B. Measurable Goals.....</b>	<b>6</b>
<b>IV.</b>	<b>Results of Information Collected and Analyzed (5.4.2).....</b>	<b>7</b>
<b>V.</b>	<b>Planned Activities and Proposed Changes to the Stormwater Management Program (5.4.3 and 5.4.4).....</b>	<b>8</b>
	<b>A. Storm water activities planned for next reporting cycle.....</b>	<b>8</b>
	<b>B. Proposed changes to storm water management program .....</b>	<b>10</b>
<b>VI.</b>	<b>Water Quality Controls for Discharges to Impaired Waterbodies (3.1.2).....</b>	<b>11</b>
<b>VII.</b>	<b>Protection of Listed Threatened or Endangered Species (3.2).....</b>	<b>14</b>
<b>VIII.</b>	<b>Explanation of Amended or Replaced BMPs (from Part I).....</b>	<b>15</b>
<b>IX.</b>	<b>Tracking of measurable goals.....</b>	<b>16</b>
	<b>Footnotes.....</b>	<b>17</b>

# I. Status of Compliance with Permit Conditions (5.4.1) Six Minimum Measures, BMPs and Milestones

## A. Status of Compliance with BMP Milestones

The following table is designed for you to report the status of your progress in implementing storm water management BMPs. The table includes a list of BMPs by the code number. These BMP codes refer to the BMPs, and the respective codes, that you submitted to us in your NOI. [Or, in annual reports for years 2-5, these codes refer to amended BMPs as you reported to us in the previous year's annual report]. Add rows if you have more than four BMPs; e.g., 1A, 1B, 1C, 1D, 1E, 1F.

Likewise, the milestone refers to the Year 5 milestone that you included in your NOI. [Or, in subsequent annual reports, the milestone refers to the milestone that you reported to us in the previous year's annual report.]

You must check Yes or No for each of the BMPs that you submitted in your NOI.

- Check **Yes** if the BMP is essentially unchanged and you accomplished the milestone. Indicate a date of completion.
- Check **No** if you did not accomplish the milestone. If you check No, and you are not changing or replacing the BMP or the milestones, indicate the date you expect to complete the milestone.
- Check in one of the **Amended** columns if you wish us to recognize an amended BMP or an amended milestone. If you are amending the BMP, most likely you will also need to amend the milestone, and in that case, check both Amended BMP and Amended Milestone. If the BMP is unchanged, but you are changing milestones in subsequent years, check in the Amended Milestones column.
- If you indicate an amended BMP or milestone, then you should check in last column as well, indicating that you describe the amendment below and provide the necessary analysis in Part VIII.

BMP Code	Milestone	Yes	No	Date completed or If "No," Date to be completed	Amended/Replaced Supplemented		An "Amended" response is described below and in Part VIII.
					BMP	Milestones	Yes/No
1A	Year 5	X		Sent certificates of appreciation to participants of all past events in 12-07			
1B	Year 5	X		Ongoing since its inception in Year 2			
1C	Year 5	X		Ongoing since its inception in Year 2			
1D	Year 5	X		Two Guest Speaker forums were held			
2A	Year 5	X		Ongoing quarterly SWAC meetings			

2B	Year 5	X		Town Council hears all enforcement cases			
2C	Year 5	X		SWAC reviewed/approved Year 4 Annual Report to TDEC			
2C	Year 5	X		Held 2 <sup>nd</sup> Annual WaterFest in 7-08			
2D	Year 5	X		Ongoing issuance of certificates of appreciation			
3A	Year 5	X		Revised to include <1 ac. SWPPP drafted by engineer of record in 2-08			
3B	Year 5	X		Inventoried 100% of outfalls in 3-08			
3C	Year 5	X		Ongoing since its inception in YR-2			
3D	Year 5	X		All inventoried outfalls were entered into GIS database in 4-08			
4A	Year 5	X		Revised to include <1 ac. SWPPP drafted by engineer of record in 2-08			
4B	Year 5	X		Ongoing maintenance of detailed filing & tracking system			
4C	Year 5	X		Ongoing enforcement of TDEC manual			
4D	Year 5	X		Ongoing monthly inspections since early 2008			
4E	Year 5	X		Ongoing issuance of NOV's & SWOs issued by Public Works Director			
5A	Year 5	X		Cited MTAS manual in SWM ordinance in 3-08			
5B	Year 5	X		Ongoing quarterly basin inspections since 8-07			
5C	Year 5	X		Cited MTAS manual in SWM ordinance in 3-08			
5D	Year 5	X		WQBZ policy is still being defended			

5D	Year 5	X		Guest Speaker Forum introduced TN Visual Stream Assessment Protocol, televised on Channel 3 in 7-07			
6A	Year 5	X		All 10 MPPPs completed in 2-08			
6B	Year 5	X		MPPP for ROW/ditches completed in 2-08			
6C	Year 5	X		Training courses & inspections were required in all 10 MPPPs in 2-08			

**B. Status of compliance for amended and replaced BMPs**

For every amended/replaced BMP and/or milestone above, provide the compliance status with respect to the new milestone for this year. The new milestones must be detailed in Part VIII.

BMP Code	Milestone	Milestone Description	Yes	No	Date completed or If "No," Date to be completed
		None of the Year 5 milestones listed in the previous table were amended or replaced. They are as they were originally described in the NOI, unless they were amended or added in the Year 3 or 4 Annual Reports to TDEC.			

**Explanation for "No" Responses in either table above**

BMP Code	Explanation for "No" Response
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Go to next page.

## II. Assessment of the appropriateness of identified BMPs (5.4.1)

For every BMP or amended BMP, assess the appropriateness of the BMP in the following table. For the first year annual report, assume “Good” unless you have evidence to support an inappropriate, minimal or superior assessment.

BMP Code	Short title	We consider the listed BMP appropriate to the following degree:				
		Inappropriate	Minimal	Good	Superior	
1A	Award and recognition program to recognize significant efforts and contributions				X	
1B	Place all SWAC minutes and Town of Smyrna ordinances and policies and information web page.				X	
1C	Continue to use and enhance hot line, tracking and responding to all calls				X	
1D	Conduct quarterly Guest Speaker Forums for town officials & Channel 3 broadcast				X	
2A	Hold quarterly SWAC meetings to update citizens of SWM Program progress and to review/approve policies and Annual Reports to TDEC				X	
2B	Hold Town Council as body that hears all SW enforcement cases				X	
2C	Hold quarterly SWAC meetings to update citizens of SWM Program progress and to review/approve policies and Annual Reports to TDEC				X	
2C	Hold annual WaterFests in conjunction with Boat Days				X	
2D	Reward significant contributions to stream cleanups, WaterFests, & Boat Days				X	
3A	Review & revise SWM Ordinance-Illicit Discharge Determination Elimination in < 1 ac. SWPPP				X	
3B	Complete dry weather screen all outfalls & inventory map				X	
3C	Continue to track & respond to all hot line complaints				X	
3D	Map & inventory all storm water outfalls				X	
4A	Review & revise SWM Ordinance-Construction Activities in <1 ac. SWPPP				X	
4B	Review, approve & record construction site/land disturbance activities through detailed filing & tracking system				X	
4C	Enforce all erosion prevention sediment control measures according to TDEC manual				X	
4D	Inspect all construction sites monthly				X	

4E	Continue to implement & enforce policies, procedure, & penalties through NOV's & SWOs issued by Public Works Director					X	
5A	Use MTAS Post-Construction Runoff Control manual as cited in SWM ordinance					X	
5B	Inspect all detention basins quarterly according to Town of Smyrna Dry Detention Basin Policy					X	
5C	Use MTAS Post-Construction Runoff Control manual as cited in SWM ordinance					X	
5D	Defend WQBZ policy under all circumstances					X	
5D	Introduce TN Visual Stream Assessment Protocol to general public via Guest Speaker Forum Channel 3 broadcast					X	
6A	Develop Municipal Pollution Prevention Plans (MPPPs) for all ten Town of Smyrna facilities, including Right of Ways & drainage ditches					X	
6B	Develop routine program for roadways/right of ways/drainage ditch maintenance & inspections					X	
6C	Perform SW pollution prevention training for all staff & hold regular MPPP inspections					X	

### III. Progress with respect to MEP and Measurable Goals (5.4.1)

Element 5.4.1 requires you to report progress towards achieving the statutory goal of reducing the discharge of pollutants to the maximum extent practicable (MEP)<sup>1</sup>, and the measurable goals for each of the minimum control measures.

#### A. MEP

*Of the [26]<sup>2</sup> BMPs that comprise our storm water management program in the six minimum measures, we have accomplished Year 5 milestones for [26 of 26]<sup>3</sup>. This does / does not represent substantial progress in achieving the statutory goal of reducing the discharge of pollutants to the MEP.*

#### B. Measurable goals

*Of the [26 of 26] BMPs shown above, we have accomplished Year 5 milestones for [26 of 26]. This represents progress toward achieving the measurable goals identified in our original NOI and in this annual report. For the measurable parameters/goals, we have been able to track for this past year, the measurements are recorded in Part IX.*

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Signed

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Dated

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Printed Name and Title

Go to next page.

#### IV. Results of Information Collected and Analyzed (5.4.2)

Element 5.4.2 of the permit requires you to report results of information collected and analyzed, if any, during the reporting period, including monitoring data used to assess the success of the program at reducing the discharge of pollutants to the MEP

*A brief summary of information, including analytical and/or non-analytical monitoring results, is listed below. Detailed information is collected and available at the offices of the MS4.*

<b>Parameter</b>	<b>Relevant BMP, or Purpose of Information</b>	<b>Conclusions</b>
Water quality monitoring is not a requirement listed in the Town of Smyrna's NOI, so it is not a required element of this annual report.		

Go to next page.

## V. Planned Activities and Proposed Changes to the Storm Water Management Program (5.4.3 and 5.4.4)

### A. Storm water activities planned for next reporting cycle

Element 5.4.3 requires a summary of the storm water activities you plan to undertake during the next reporting cycle (including an implementation schedule).

*The storm water activities planned for the next reporting cycle are the BMPs as reflected in our NOI and as amended (if any) in subsequent annual reports, including this annual report, and are as follows:*

BMP Code	Title/Name of BMP	Milestone for next reporting cycle
1A	Public Education & Outreach Programs	Initiate contract then hire and oversee half-time educator to improve the effectiveness of Project WET through close interaction with teachers and principals throughout Rutherford County.
1A	“	Organize civic groups for spring/fall cleanup programs & team up with TNARNG for lake shoreline cleanup
1A	“	Hold 1 <sup>st</sup> Annual Stewart Creek Boat Day & 3 <sup>rd</sup> Annual WaterFest
1B	Website	Enhance SWM database reports accessible from web page, continue adding SWAC meeting documents
1C	Hotline	Computerize reporting system to generate annual report
1D	Public Meetings & Training	Conduct quarterly Guest Speaker Forums for town officials & general public for Channel 3 broadcast
2A	Storm Water Advisory Committee	Conduct quarterly meetings, review Storm Water Mgmt (SWM) Ordinance revisions when needed
2B	Storm Water Oversight by Town Council	Set hearings & appeals process for violations (Town Council)
2C	Public Meetings	Town Council reviews & approves Annual Reports to TDEC & SWM policies
2D	Citizen Action Groups	Continue rewarding participants in Guest Speaker Forums, stream cleanups, WaterFests, & Boat Days
3A	Municipal Storm Water Ordinance	Evaluate SWM Ordinance-IDDE & revise as needed
3B	Dry Weather Screening/Inspections	Randomly inspect outfalls already inventoried
3B	Illicit Discharge Inspections	Conduct quarterly inspections of all grease receptacles & auto repair/paint-body shops
3C	Hotline & Complaints Tracking System	Computerize reporting system to generate cumulative listing & continue to respond ASAP to all complaints
3D	Storm Water System Inventory & Map	Update inventory/map with new storm water structures
4A	Municipal Storm Water Ordinance	Evaluate SWM Ordinance-Construction Activities & revise as needed
4B	Review, approve, & record keeping of construction sites	Review and revise procedures & develop detailed computerized filing system & up-to-date tracking, recording, and reporting.
4B	Review, approve, & record keeping of construction sites	Continue to review all construction plans & sites for proper EPSC prior to issuance of grading permits

4B	Review, approve, & record keeping of construction sites	Maintain fully EPSC Level I-trained SWM Program, Street Department & Utility Department staffs.
4C	Manual for Erosion Prevention & Sediment Control	Send annual Town of Smyrna sediment control guidance to ~200 developers, contractors, builders & refer them to TDEC manual
4D	Construction Site Inspection Program	Conduct monthly inspection of construction sites
4E	Enforcement	Continue to issue NOVs to violators & perform follow-up inspections. Send SWOs through Public Works Director
4E	Enforcement	Continue 'priority construction activity' inspections on a monthly basis
5A	Municipal Storm Water Ordinance-Post Construction Runoff Control	Evaluate SWM Ordinance-Post Construction Runoff Control & revise as needed
5B	Review, approve, & record-keeping of Post-Construction Activities	Conduct quarterly inspections of detention basins
5B	Review, approve, & record-keeping of Post-Construction Activities	Implement procedures & develop detailed computerized filing system and up-to-date tracking, recording, & reporting.
5C	Manual for Post-Construction BMPs	Continue to endorse the usage of MTAS BMP manual & endorse the use of rain barrels, swales, pervious concrete, et al
5D	Structural & non-structural strategies for Post-Construction Runoff Control	Implement Post-Construction innovative BMP requirements, including stream buffers, swales, rain gardens, & porous pavement. Encourage commercial property owners to retrofit properties with these BMPs in an effort to enhance water quality & protect Smyrna drainage system
5D	Structural & non-structural strategies for Post-Construction Runoff Control	Implement TN Visual Stream Assessment program to develop streamside/non-structural strategies & monitoring, while attracting citizen involvement
6A	Municipal Storm Water Pollution Prevention Program	Hold inspections of all ten Town of Smyrna facilities, including Right of Ways (ROWs) & drainage ditches
6B	Rights of Ways & drainage ditches	Initiate ROW & drainage ditch program according to MPPP
6C	Municipal Storm Water Pollution Prevention Program-Training for City Departments & staff	Conduct annual courses for staff of aforementioned facilities according to MPPP

*Additional, significant activities planned for the next reporting cycle are noted below.*

Activity	Summary Description	Purpose
Stream monitoring by MTSU's CLEAR Water Institute of all Town of Smyrna 303(d) listed streams.	Stream water at 18 sites on 303(d) listed Stewart Creek and its three listed tributaries will be weekly monitored for nutrients, fecal bacteria, chemicals, metals, and other parameters for 13 weeks. Stream water at five of these sites will also be monitored during a storm event. Stream sediment at 15 sites in these same streams will also be monitored, once, for metals and total hydrocarbons.	To establish a baseline of the health of these streams as well as to pinpoint the sub-watersheds containing sources of significant pollutants.

**B. Proposed changes to storm water management program**

Element 5.4.4 requires a report on proposed changes to your storm water management program, including changes to any BMPs or any identified measurable goals that apply to the program elements.

*Amended and replacement BMPs (if any) are reflected in Part I.A. and Part VIII, and in the above table and will not be repeated here. Additional, proposed changes are noted below.*

<b>Change to Program</b>	<b>Summary Description</b>	<b>Rationale</b>

## VI. Water Quality Controls for Discharges to Impaired Waterbodies (3.1.2)

The table below lists impaired waterbodies affected by discharges from this MS4, the pollutants of concern, and the two BMPs we believe to be the most significant in controlling discharges of these pollutants.

<b>Stream Name</b>	<b>Pollutants</b>	<b>Priority BMP 1</b>	<b>Priority BMP 2</b>
<i>Olive Branch TN05130203 010-0200</i>	<i>Siltation Habitat Alteration</i>	Construction site sediment control measures, including, but not limited to: silt fences, straw bales, heavy equipment construction entry/exit(s), stabilized ditches, check dams, sediment basins, seed & straw undeveloped areas, grass buffer strips along stream banks, & cement mixer cleanout areas, must be properly installed & maintained	Education / Outreach
<i>Harts Branch TN05130203 010-0300</i>	<i>Siltation Habitat Alteration</i>	Construction site sediment control measures, including, but not limited to: silt fences, straw bales, heavy equipment construction entry/exit(s), stabilized ditches, check dams, sediment basins, seed & straw undeveloped areas, grass buffer strips along stream banks, & cement mixer cleanout areas, must be properly installed & maintained	Education / Outreach
<i>Rock Springs Branch TN05130203 010-0310</i>	<i>Siltation Habitat Alteration</i>	Construction site sediment control measures, including, but not limited to: silt fences, straw bales, heavy equipment construction entry/exit(s), stabilized ditches, check dams,	Education / Outreach

		sediment basins, seed & straw undeveloped areas, grass buffer strips along stream banks, & cement mixer cleanout areas, must be properly installed & maintained	
<i>Stewart Creek TN05130203 010-1000</i>	<i>Siltation Habitat Alteration</i>	Construction site sediment control measures, including, but not limited to: silt fences, straw bales, heavy equipment construction entry/exit(s), stabilized ditches, check dams, sediment basins, seed & straw undeveloped areas, grass buffer strips along stream banks, & cement mixer cleanout areas, must be properly installed & maintained	Education / Outreach

*The table below lists impaired waterbodies for which the state has promulgated a TMDL. For the waterbodies indicated, we have complied with the requirements of the permit as noted by the check marks. [The table below includes two columns for two TMDLs. If additional space is needed, add additional table(s).]*

	<b>Waterbody Name/ Pollutant of Concern</b>	<b>Waterbody Name/ Pollutant of Concern</b>
<b>Permit Requirement</b>	<b>Olive Branch Harts Branch/ Sediment &amp; Habitat alteration</b>	<b>Rock Springs Branch Stewart Creek/ Sediment &amp; Habitat alteration</b>
3.1.3.1 Is the pollutant likely to be found in storm water discharges from the MS4?	Yes	Yes
3.1.3.2 Does the <u>TMDL</u> include a pollutant wasteload allocation, implementation recommendations, or other performance requirements specifically for storm water discharges from your MS4?	Yes	Yes
3.1.3.3 Does the TMDL address a flow regime likely to occur during periods of storm water discharge?	Probably	Probably
3.1.3.4 If the above three questions are true, does implementation of existing storm water control measures meet the TMDL provisions?	No	No

3.1.3.4-Or are additional control measures necessary?	Yes	Yes
3.1.3.5 Current and planned control measures are documented.	Yes	Yes
3.1.3.6 Describe method to evaluate whether storm water controls are adequate to meet the requirements of the TMDL.	Visual observations & TDEC's five-year W.Q. monitoring results	Visual observations & TDEC's five-year W.Q. monitoring results
3.1.3.7 If additional or modified controls are necessary, describe the type and schedule for the control additions/revisions.	Stream bank stabilization and riparian zone restoration at some point in time in the future. A stream monitoring program is being planned with the CLEAR Institute of MTSU and is likely to commence during the first half of Year 6. Preliminary meetings and field trips to each monitoring site were held towards the close of Year 5.	Stream bank stabilization and riparian zone restoration at some point in time in the future. A stream monitoring program is being planned with the CLEAR Institute of MTSU and is likely to commence during the first half of Year 6. Preliminary meetings and field trips to each monitoring site were held towards the close of Year 5.

## VII. Protection of Listed Threatened or Endangered Species (3.2)

*We have followed the procedures given in section 3.2 of the Tennessee small MS4 general permit to ascertain whether or not storm water discharges from the MS4 are likely to jeopardize the continued existence of any species that are listed as endangered or threatened under the ESA, or result in the adverse modification or destruction of habitat that is designated as critical under the ESA (“critical habitat”). Below is a table indicating the procedures we have followed. We retain documentation of the evaluations and decisions reached through the evaluation.*

[See the permit at section 3.2 for more detailed list of evaluation criteria.]

Evaluation criteria	Yes/No	Notes
3.2.1.2.1 Criteria A: No endangered or threatened species or critical habitat in proximity to MS4 or the point where discharges reach the receiving water	No	
3.2.1.2.2 Criteria B: Formal or informal consultation with the Fish and Wildlife Service under Section 7 of the Endangered Species Act (ESA) has been concluded and that consultation addressed effects of storm water activities or resulted in a no jeopardy or not-likely-to-affect opinion.	No	
3.2.1.2.3 Criteria C: Activities are authorized under Section 10 of the ESA	No	
3.2.1.2.4 Criteria D: Evaluated the effects of storm water discharges; we do not have reason to believe the discharge and discharge-related activities will jeopardize species or cause adverse modification or destruction of critical habitat.	No	The Town of Smyrna has not evaluated the effects of storm water discharges on the threatened, endangered, or of special concern species listed in Section VII of our submitted Year 5 ('07 -'08) annual report
3.2.1.2.5 Criteria E: Our storm water discharges and related activities are already addressed in another operator’s certification of eligibility. We agree to comply with conditions of that eligibility.	No	

\_\_\_\_\_  
Signed

\_\_\_\_\_  
Dated

\_\_\_\_\_  
Printed Name and Title

### VIII. Explanation of Amended or Replaced BMPs (from Part I)

*The following table provides description(s) of BMPs and/or milestones we wish to amend this reporting year and subsequent years, as indicated. [Add tables as necessary.]*

For every BMP that is being amended or replaced, provide the following information and analysis. The BMPs you describe here should match the ones you indicated as “Amended/Replaced” in Part I.A. of this annual report.

BMP Code	Milestone	Milestone Description	Yes	No	Date completed or If “No,” Date to be completed
		None of the Year 5 milestones listed in the previous table were amended or replaced. They are as they were originally described in the NOI, unless they were amended or added in Year 4.			

Go to next page.

## IX. Tracking of measurable goals

For each of your BMPs, you should have established a measurable parameter, and goal in terms of that measurable parameter. Measurable parameters are ways to measure activities or effects of a BMP. The goal is the parameter value established as a target. If you are not yet measuring the parameter for a given BMP, indicate Not Applicable Yet (NAY) in the Result column.

BMP Code	BMP Title	Measurable parameter	Result	Goal
1A			NAY	
1A			NAY	
1B			NAY	
1C			NAY	
1D			NAY	
1D			NAY	
2A			NAY	
2B			NAY	
2B			NAY	
2C			NAY	
2D			NAY	
3A			NAY	
3B			NAY	
3B			NAY	
3C			NAY	
3D			NAY	
4A			NAY	
4B			NAY	
4C			NAY	
4D			NAY	
4E			NAY	
5A			NAY	
5B			NAY	
5C			NAY	

5D			NAY	
6A			NAY	
6B			NAY	
6C			NAY	

## Footnotes

<sup>1</sup> *Maximum extent practicable* (MEP) is the statutory standard that establishes the level of pollutant reductions that operators of regulated MS4s must achieve. The CWA requires that NPDES permits for discharges from MS4s “shall require controls to reduce the discharge of pollutants to the maximum extent practicable, including management practices, control techniques and system, design and engineering methods.” CWA 402(p)(3)(B)(iii).

<sup>2</sup> Insert the number of BMPs listed in your NOI, as updated by subsequent annual reports. Example: if each minimum measure has five BMPs associated with it, you would insert [30] as the number of BMPs. [6 X 5]

<sup>3</sup> Insert the number of Year 5 milestones accomplished. For example, if 26 Year 5 milestones are accomplished at the end of Year 5, then you would insert [26 of 26] in these brackets.